



Normative Interpretations for SBP Standards v2.0

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October 2025

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Document history

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NOTE: Interpretations concerning Instrument Documents and Guidance Documents can be found in the section of the relevant Standard. For example, interpretations concerning Instruction Document 1A are given in the section on Standard 1.

The latest additions are highlighted in a coloured box.



Glossary

Low grade stemwood

Original text: N/A

Correction: *Wood from the stem of a tree (i.e., excludes branches, stumps and roots) that is not merchantable as sawtimber in local markets. This excludes salvage trees, end-of-life trees and trees removed for nature conservation.*

Rationale: To support the implementation and auditing of the requirement, a definition has been added.

Material status

Original text: N/A

Correction: *The characteristic of feedstock or biomass is defined by the combination of the Product Group of the feedstock/biomass and its certification status (SBP-compliant, SBP-controlled or non-certified).*

Rationale: A definition is needed to facilitate the implementation and auditing of the indicators where material status is used.

Product Group

Original text: N/A

Correction: *Categories used by SBP to identify the origin of the feedstock used for the production of biomass.*

Rationale: A definition is needed to facilitate the implementation and auditing of the indicators where material status is used.

Short Rotation Coppice

Original text: Trees originating from plantations on agricultural land with short harvest rotations less than eight (8) years, including agroforestry (where trees are grown in short rotation around or among crops or pastureland to optimise use of the land).

Correction: *Plantation which has been or will be regenerated from shoots formed at the stumps of the previous crop trees, root suckers, or both, i.e., by vegetative means with short harvest rotations, generally less than eight (8) years. Trees originating from plantations on agricultural land with short harvest rotations, including agroforestry (where trees are grown in short rotation around or among crops or pastureland to optimise use of the land).*

Rationale: The additional definition references the FAO definition of coppice. The original definition is also maintained with the addition of “generally” to acknowledge that local SRC management practices and definition might defer.



Thinning

Original text: Wood originating from the trees felled during the implementation of a thinning performed prior to trees reaching merchantable size, in any case not significantly larger than 11cm (4.5 inches) measured as diameter at breast height measured at 137cm (4.5 ft) above the ground.

Correction: *Silvicultural operation intended to increase tree growth and maintain forest health by regulating stand density.*

Rationale: The original definition was that for pre-commercial thinning. As pre-commercial thinning is not used in the Standards, but thinning is, a definition is added.



Standard 1: Feedstock Compliance

Instruction Document 1A, Indicator 2.2

Original text :

Requirement	Trees outside forests (TOF) – Urban and landscape feedstock		Trees outside forests (TOF) – Agricultural land feedstock		
	Landscape	Urban, domestic and infrastructure	Woody residues from agricultural land ¹		Woody energy crops, short rotation coppice
			Woody residues	Primary production of the agriculture	
2.2 Ecosystem productivity, functions, and services are maintained or enhanced					
2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion:	YES	N / A	YES	YES	YES
a. Forests	YES	YES	YES	YES	YES
b. Wetlands	YES	YES	YES	YES	YES
c. Peatlands	YES	YES	YES	YES	YES
d. Highly biodiverse grasslands	YES	YES	YES	YES	YES
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	YES	N / A	N / A	N / A	YES

Correction:

Requirement	Trees outside forests (TOF) – Urban and landscape feedstock		Trees outside forests (TOF) – Agricultural land feedstock		
	Landscape	Urban, domestic and infrastructure	Woody residues from agricultural land ¹		Woody energy crops, short rotation coppice
			Woody residues	Primary production of the agriculture	
2.2 Ecosystem productivity, functions, and services are maintained or enhanced					
2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion:	YES	N / A	YES	YES	YES
a. Forests	YES	N/A	YES	YES	YES
b. Wetlands	YES	N/A	YES	YES	YES
c. Peatlands	YES	N/A	YES	YES	YES
d. Highly biodiverse grasslands	YES	N/A	YES	YES	YES
2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	YES	N / A	N / A	N / A	YES

Rationale: The table presented a series of typos. As the main header is “N/A”, the sub-criteria should be “N/A”.

Guidance Document, Indicator 4.1.8

Original text: Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.

Additional guidance: *The intent is that operators equip their workers with adequate and relevant knowledge (e.g., first aid training, forestry training for forest workers, social training for community liaison, etc.) so that they perform their work in accordance with the SBP Standards. It does not necessarily mean the workers must have knowledge of SBP or its Standards, but that they are adequately trained to perform their work and ensure overall compliance of the operations with the SBP Standards.*



Standard 2: Verification of SBP-compliant Feedstock

Clause 3.11

3.11 The Organisation shall consider feedstock as SBP-compliant if:

- a. the results of the Risk Assessment(s) conclude low risk for all Indicators, or
- b. the results of the Risk Assessment(s) conclude specified risk however the RMMs have effectively reduced all specified risks to low risk, or
- c. the Organisation can provide evidence that the feedstock can be categorised as processing residues and that the feedstock is certified against an SBP-recognised certification scheme, or
- d. the Organisation can provide evidence that the feedstock can be categorised as post-consumer

Q: Can feedstock be considered SBP-compliant if the Biomass Producer knows that Standard 1 requirements are not met (e.g., forest conversion without plans for regeneration), but the RRA for the specific region/country defines Low Risk for this requirement?

A: No. If a Biomass Producer or Certification Body has evidence that feedstock originates from a source where Standard 1 requirements are not met, it cannot be accepted as SBP-compliant. If a published RRA for the country/region defines Low Risk for the requirement, the Certification Body must report such cases to SBP to inform a potential review of the RRA risk rating. If a Company Risk Assessment (CRA) has been developed by a Biomass Producer, the Certification Body must evaluate whether the Biomass Producer shall revise the CRA risk conclusion.

Clauses 5.3 and 6.1

Normative Interpretation: If a Biomass Producer exclusively sources FSC or PEFC certified feedstock (e.g., from a certified forest plantation under its ownership), then it shall only develop SBVs and conduct a Risk Assessment for those indicators that are marked as partially met or not met in a corresponding SBP evaluation report for (i.e., evaluation reports developed per the Framework for benchmarking and recognition of certification schemes relevant to the scope of SBP certification, <https://sbp-cert.org/documents/process-documents/framework-for-benchmarking-and-recognition-of-certification-schemes-relevant-to-the-scope-of-sbp-certification/>).

Clause 7.1

7.1 The Organisation shall develop a Risk Management Plan (RMP) which includes Risk Management Measures (RMMs) for each Indicator rated as specified risk within its SBE per the Organisation's Risk Assessment or an SBP-endorsed RRA with the objective to mitigate the risk and reduce the risk rating to low risk.



Q: Are there any differences in requirements between non-certified (neither FSC- nor PEFC-certified) primary feedstock and processing residues feedstock regarding RMMs? Does processing residues feedstock have any exceptions or flexibility?

A: *No. The obligation to develop Risk Mitigation Measures is the same for both types of feedstock. The only difference lies in the implementation of RMMs, as mitigating risk may require more effort when sourcing through longer and more complex supply chains (e.g., residues from sawmills versus primary feedstock directly from forests).*

Q: Can supplier audits using sampling (e.g., auditing a portion of suppliers annually, typically applying a square root or percentage formula) be considered sufficient RMM?

A: *No. It is essential to distinguish between RMM implementation (i.e., reducing risk to low) and monitoring the implementation and effectiveness of RMMs. When implementing RMMs, Biomass Producers must work with all suppliers and sub-suppliers, ensuring all feedstock sources included in the RMP implement the identified mitigation measure(s). Biomass Producers may delegate the implementation of RMMs to their direct suppliers. For instance, a sawmill supplying processing residues may be tasked with implementing RMMs for its own suppliers, such as logging companies or forest owners. However, the overall responsibility for risk management always remains with the Biomass Producer.*

Monitoring the effectiveness of RMMs may indeed involve supplier audit sampling, but it is likely not to be an effective mitigation measure in itself. Audit of suppliers is one of various means of verifying the effective implementation of mitigation measures at supplier level. If sampling is used, sampling must be statistically representative to provide sufficient confidence that measures have been effectively implemented.

Clauses 7.1 and 7.2

7.1 The Organisation shall develop a Risk Management Plan (RMP) which includes Risk Management Measures (RMMs) for each Indicator rated as specified risk within its SBE per the Organisation's Risk Assessment or an SBP-endorsed RRA with the objective to mitigate the risk and reduce the risk rating to low risk

7.2 The Organisation shall implement any RMMs proposed by SBP (i.e., in Instruction Documents) or by SBP-endorsed RRAs.

Clarification: *The term 'SBP-endorsed RRA' in clauses 7.1 and 7.2 also includes 'SBP Interim RRA'. An SBP Interim RRA for a region might be published by SBP to enable Certificate Holders to develop and implement mitigation measures and for Certification Bodies to certify the Certificate Holders until an SBP-endorsed RRA for the said region is published.*

If any of the risk ratings in the final SBP-endorsed RRA have changed from low to specified compared to the SBP Interim RRA, the Biomass Producer will need to update its Supply Base Evaluation accordingly. There will be a 6-month transition period for the Organisation to implement the SBP-endorsed RRA, and will be subject to verification during the Certification Body's surveillance audit. If the transition to the SBP-endorsed RRA is not completed, the CB shall raise a major non-conformance.



Standard 3: Requirements for Certification Bodies

Clause 1.1.7

Clarification: With regards to clause 1.1.7 the geographical scope of SBP accreditation shall match the geographical scope of FSC® and/or PEFC Chain of Custody accreditations.

Clause 4.1

Clarification: There are several exceptions to clause 4.1a, the:

- BP only sells SBP-controlled biomass;
- REDII Level A risk assessment for the BP's Supply Base has rated all indicators as low risk;
- SBP Regional Risk Assessment for the BP's Supply Base rated all indicators as low risk;
- BP only sources Processing Residues feedstock with a claim from an SBP-recognised certification scheme (i.e., FSC or PEFC).

In situations listed above, an auditor qualification in FSC or PEFC CoC is sufficient (i.e., 4.1b applies).

Clause 4.12 (and Instruction Document 5E, clause 2.1)

Clarification: When assigning a Product Group ID, the BP may use three digits once A=9 has been reached, e.g., 101, 102, 103 etc.

Clause 6.22

Clarification: X = number of Forest Management Units or suppliers, i.e., the term 'sourcing area' shall be interpreted as 'Forest Management Unit' (FMU). Nonetheless, the CB audit samples shall include both suppliers and FMU.

Where a BP's RMMs have to be implemented on an FMU or supplier level, only those FMUs or suppliers shall be included in an CB audit sample.

Example: Two sawmills supply a pellet mill (BP) and each of the two sawmills buy from 500 different FMUs. Out of 1,000 FMUs, RMMs had to be implemented at the FMU level for only 200 FMUs. The sample shall be calculated with $X = 200$, not $X = 1,000$. In this case, $Y = 0.8 \text{ SQRT}(200) = 0.8 \times 14.1 = 11.3$. The sample shall include 12 FMUs (always round up).

If RMMs must also be implemented at a supplier level, then the CB shall consider it as a separate sample set. In the example above, the X for the supplier sample would be 2. In this case, $0.8 \times \text{SQRT}(2) = 0.8 \times 1.4 = 1.13$. The sample shall include the 2 suppliers (always round up).

Section 8 Non-conformances

Normative interpretation: Where a non-conformance (NCR) is identified when auditing a Biomass Producer's Supply Base Evaluation process (Standard 2), that NCR shall be categorised as a major NCR under the following circumstances:



- a) *Failure to develop and implement a Supply Base Evaluation process;*
- b) *Absence of credible and verifiable information that demonstrates the origin of feedstock;*
- c) *Failure of the organisation to demonstrate that its risk assessment has been conducted in accordance with the applicable SBP requirements;*
- d) *Failure to use an SBP-endorsed Regional Risk Assessment, if such exists;*
- e) *Use of feedstock originating from unevaluated sourcing areas, in other words, without the Certification Body's approval of a revised SBE scope for the organisation (new sourcing areas may only be added through a scope change audit);*
- f) *Failure to establish and implement control or mitigation measures; or*
- g) *Failure to provide information required to be made publicly available in the Supply Base Report (e.g., description of supply base, risk assessment or risk mitigation measures that do not adequately inform stakeholders about how risks are identified and mitigated and, on the verification, and risk mitigation measures implemented).*

For any of the circumstances above, CB auditors shall issue a MAJOR NCR. The CB may only issue or re-issue a certificate if all identified NCRs (i.e., both major and minor non-conformances) are closed (SBP Standard 3, 8.11).

Clause 8.9

Original text: Timelines for corrective action requests shall commence from the day of the certification decision.

Correction: *Timelines for corrective action requests shall commence from the day of the certification decision, except for major corrective action requests, which shall commence from the date when the major corrective action request was formally communicated in writing to the Certificate Holder, which shall be no later than 30 days from the day of the audit closing meeting.*

Clause 11.6

Original text: CBs shall take certification decisions no later than one month after the date of the closing meeting of the evaluation.

Correction: *CBs shall take certification decisions no later than three months after the date of the closing meeting of the evaluation audit.*

Annex 1, Clause 1.10

1.10 The period of validity of an SBP certificate shall not exceed five (5) years.

Normative interpretation: *The specified period of validity of certification may be extended for a single exceptional extension of up to six (6) months to permit re-evaluation to be completed, when justified by circumstances beyond the control of the Certification Body and its client. Once the Certification Body has satisfied itself that its client will maintain its conformity with the applicable SBP requirements until the new expiry date, the Certification Body shall take the following steps:*



- a. *record such circumstances;*
- b. *inform SBP Secretariat and provide:*
 - *the rationale for requesting an extension to the validity date, and*
 - *a new validity date (not more than 6 months beyond the original expiry date).*
- c. *SBP will review the request and if approved shall update the entry on the SBP Audit Portal.*

SBP will consider each extension on a case-by-case basis, and none shall be taken as forming any precedent.



Standard 4: Chain of Custody

Clause 4.10

Clarification: *The BP shall create separate mass balance accounts for SBP-compliant and SBP-controlled biomass product groups.*

Clauses 4.22 and 4.23

Original text:

4.22 The claim 'SBP-compliant' may be used on sales transactions related to biomass, only where it refers to products which are included in the Organisation's certificate scope and that meet the eligibility requirements for SBP-complaint claims.

4.23 The claim 'SBP-controlled' may be used on sales transactions related to biomass produced from the feedstock category conforming with SBP-controlled or SBP-compliant definitions.

Clarification: *In line with the decision by the SBP Standards Committee, EU REDII compliance has been made mandatory when making SBP-compliant or SBP-controlled claims under SBP Standards v2.0. Thus, SBP-compliant or SBP-controlled claims shall always be accompanied by an SBP REDII-compliant claim. EU REDII requirements are provided in a separate normative document 'Instruction Document REDII: Bridging Requirements for Meeting REDII' (or the REDII Bridging Instruction Document).*



Standard 5: Collection and Communication of Data

Standard 5 (v2.0), Clause 2.3 and Instruction Document 5E (v2.1), Clause 1.2.1

Original text: Each BP shall record all data in one of the three 'SBP Audit Report (SAR) for Energy and Carbon Data' (SAR) templates, where production and transportation of feedstock or biomass contributes to energy or carbon balance during the period of legal ownership by the BP:

- BPs producing wood pellets shall complete the 'SBP Audit Report (SAR) for Energy and Carbon Data for Pellets';
- BPs producing only woodchips and energy logs and no other biomass with an SBP Claim shall complete one of the following templates:
 - 'SBP Audit Report (SAR) for Energy and Carbon Data for Pellets' if both stationary chipping and thermal treatment are carried out on a separate processing site. Any specific reference to pelletisation in the document may be ignored;
 - 'SBP Audit Report (SAR) for Energy and Carbon Data for Woodchips with Stationary Chipping' if only stationary chipping is carried out on a separate processing site, with or without phytosanitary treatment; or
 - 'SBP Audit Report (SAR) for Energy and Carbon Data for Woodchips with Mobile Chipping' if there is no separate processing site with chipping or thermal treatment, other than a standard phytosanitary treatment.

Correction: Each BP shall record all data in one of the three 'SBP Audit Report (SAR) for Energy and Carbon Data' (SAR) templates, where production and transportation of feedstock or biomass contributes to energy or carbon balance during the period of legal ownership by the BP.

The table below provides the Product Type nomenclature that shall be used by SBP Certificate Holders for the classification of SBP Product Types and relevant three 'SBP Audit Report (SAR) for Energy and Carbon Data' (SAR) template(s) to be used for each applicable product type.

Category	Sub-category	Applicable SAR template(s)
WB 1 Wood pellets	WB 1.1 Wood pellets	• SBP Audit Report (SAR) for Energy and Carbon Data for Pellets
	WB 1.2 Steam exploded pellets	• SBP Audit Report (SAR) for Energy and Carbon Data for Pellets
	WB 1.3 Torrefied pellets	• SBP Audit Report (SAR) for Energy and Carbon Data for Pellets
	WB 1.4 Biocarbon pellets	• SBP Audit Report (SAR) for Energy and Carbon Data for Pellets



WB 2 Wood in particles (bulk product)	WB 1.5 Biocoal pellets	• SBP Audit Report (SAR) for Energy and Carbon Data for Pellets
	WB 1.6 Biochar pellets	• SBP Audit Report (SAR) for Energy and Carbon Data for Pellets
	WB 2.1 Wood chips	• SBP Audit Report (SAR) for Energy and Carbon Data for Woodchips with Stationary Chipping; AND/OR • SBP Audit Report (SAR) for Energy and Carbon Data for Woodchips with Mobile Chipping • SBP Audit Report (SAR) for Energy and Carbon Data for Woodchips with Stationary Chipping
	WB 2.2 Sawdust	• SBP Audit Report (SAR) for Energy and Carbon Data for Woodchips with Stationary Chipping
	WB 2.3 Wood shavings	• SBP Audit Report (SAR) for Energy and Carbon Data for Woodchips with Stationary Chipping
	WB 2.4 Other residues from wood processing	• SBP Audit Report (SAR) for Energy and Carbon Data for Woodchips with Stationary Chipping;
	WB 2.5 Biocarbon	AND/OR • SBP Audit Report (SAR) for Energy and Carbon Data for Woodchips with Mobile Chipping • SBP Audit Report (SAR) for Energy and Carbon Data for Pellets
	WB 2.6 Biocoal	• SBP Audit Report (SAR) for Energy and Carbon Data for Pellets
	WB 2.7 Biochar	• SBP Audit Report (SAR) for Energy and Carbon Data for Pellets
	WB 2.8 Lignin	• SBP Audit Report (SAR) for Energy and Carbon Data for Pellets
WB 3 Wood briquettes	WB 3.1 Wood briquettes	• SBP Audit Report (SAR) for Energy and Carbon Data for Pellets
	WB 3.2 Biocarbon briquettes	• SBP Audit Report (SAR) for Energy and Carbon Data for Pellets
	WB 3.3 Biocoal briquettes	• SBP Audit Report (SAR) for Energy and Carbon Data for Pellets
	WB 3.4 Biochar briquettes	• SBP Audit Report (SAR) for Energy and Carbon Data for Pellets
WB 4 Rough wood	WB 4.1 Roundwood	• SBP Audit Report (SAR) for Energy and Carbon Data for Woodchips with Mobile Chipping
	WB 4.2 Twigs	• SBP Audit Report (SAR) for Energy and Carbon Data for Woodchips with Mobile Chipping

Rationale: The table reflects the amended SBP Product Types that BPs can produce within their SBP certification scope. BPs need to choose the applicable SAR template that cover their biomass production processes.

NOTE: The table is also aligned with SBP fee schedule.



Instruction Document 5E (v2.1), clause 2.1 (and Standard 3, clause 4.12)

Clarification: When assigning a Product Group ID, the BP may use three digits once A=9 has been reached, e.g., 101, 102, 103 etc.

Instruction Document 5E (v2.1), clause 4.1 Transaction claim requirements

DTS transactions for Biomass Producer/End-user Certificate Holders

Clarification: For those Certificate Holders that have both Biomass Producer and End-user within their (single site) SBP certificate scope, any biomass produced and consumed on-site with an SBP claim shall be registered in the DTS. Such transactions shall be created by the company Certificate Holder and include at least one Transaction Batch with the Production Batch ID defined by the company. The Transaction shall be marked as 'Consumed' after this has been physically consumed. The transaction shall be set it as 'Consumed' within 30 calendar days after this has been physically consumed.



Standard 6: Energy and Carbon Balance Calculation

Currently no interpretation matters have been published for Standard 6.

Instruction Document REDII and EU RED

Application of Article 29(15) REDIII - Grandfathering Clause

1 Purpose

This normative interpretation provides guidance on the application of Article 29(15) of Directive (EU) 2018/2001 as amended by Directive (EU) 2023/2413 (hereinafter referred to as “REDIII”). On 18 July 2025, France became the first Member State in the EU to invoke the grandfathering clause. SBP is publishing this interpretation, as requested by the European Commission, to support the implementation of this clause by SBP Certificate Holders and Certification Bodies.

2 Legal basis

This normative interpretation provides guidance on the application of Article 29(15) of Directive (EU) 2018/2001 as amended by Directive (EU) 2023/2413 (hereinafter referred to as “REDIII”), which establishes a transitional provision for the continued recognition of sustainability and greenhouse gas (GHG) emissions saving criteria set out in Article 29(15) of Directive (EU) 2018/2001 (referred to hereinafter as “REDII”).

This interpretation allows operators to continue to apply REDII criteria, provided specific market conditions are met (see Eligibility below).

3 Scope

This interpretation applies to SBP Certificate Holders located in EU Member States that have adopted the grandfathering rules and sourcing and supplying biomass and their Certification Bodies.

4 Normative interpretation

4.1 Eligibility

The conditions are set by article 29(15): “Until 31 December 2030, energy from biofuels, bioliquids and biomass fuels may also be taken into account [...] where:

(a) support was granted before 20 November 2023, in accordance with the sustainability and greenhouse gas emissions saving criteria set out in Article 29 in its version in force on 29 September 2020 [REDII] and,

(b) support was granted in the form of a long-term support for which a fixed amount has been determined at the start of the support period and provided that a correction mechanism to ensure the absence of overcompensation is in place [...].”

As such, operators can continue to demonstrate compliance with REDII sustainability and greenhouse gas emissions requirements if they were granted support before 20 November 2023 and the support meets criteria set in (b). It is the responsibility of the operators to demonstrate they meet the conditions set in article 29(15) of REDIII as published by the EU Member State invoking the grandfathering clause and as available on SBP website.



4.2 Rules

- SBP-certified Biomass Producers wishing to deliver REDII-compliant biomass exclusively to EU Member States that have formally adopted the grandfathering clause may opt to demonstrate compliance with REDII requirements.
 - Biomass Producers are not required to comply with REDIII sustainability and GHG requirements if they exclusively sell biomass to operators based in an EU Member State that has invoked the grandfathering clause, and as long as all Article 29(15) conditions are met.
- SBP-certified Traders wishing to exclusively sell REDII-compliant biomass to EU Member States that have adopted the grandfathering clause may opt to use and demonstrate compliance with REDII requirements. In such case, Traders are only permitted to trade REDII-compliant biomass.
 - Traders that have been found compliant with REDIII requirements are allowed to buy from and sell biomass to EU Member States that have adopted the grandfathering clause. Traders must maintain an adapted Mass Balance system to account for REDII and REDIII-compliant biomass.
- SBP-certified End-users wishing to consume REDII-compliant biomass in EU Member States that have adopted the grandfathering clause may opt to use and demonstrate compliance with REDII requirements.
 - End-users are allowed to purchase SBP-compliant biomass from operators that have been found compliant with the REDIII requirements.
 - End-users that have been found compliant with the REDIII requirements are allowed to buy and consume biomass that has been found compliant with REDII requirements.

This interpretation remains valid until 31 December 2030 or until such time as the relevant EU Member States withdraw the application of the grandfathering rule.

5 Practical application

- Eligibility: Only applicable to SBP-certified entities whose operations meet the above conditions set out in Article 29(15) and in this Normative Interpretation.
- Mixed market supply: If a Biomass Producer or Trader supplies to any market not covered by Article 29(15), then the entire production must comply with SBP Instruction Document EU RED: Bridging Requirements for Meeting the Renewable Energy Directive (EU/2023/2413), v2.0.
- Audit and verification: Certification Bodies must verify that the biomass produced in accordance with SBP Instruction Document REDII: Bridging requirements for meeting REDII, v1.2, published 13 November 2024, is solely supplied to eligible EU Member States and must review the evidence that the operator complies with the conditions set out in 3.1 and the requirements of this Normative Interpretation.
- SBP compliance: The Biomass Producer must remain compliant with all other applicable SBP certification requirements.

6 DTS claim and transaction

When making a transaction in the SBP Data Transfer System (DTS), the Biomass Producer shall:

- Use the claim: "SBP EU RED-compliant"

- Check the box: "SBP EU REDII grandfathering"

tree SDG EU Sustainable Biom

Template *	Transaction Batch v2.0
Transaction Batch v2.0 Name *	Transaction Batch v2.0_10
Market Specific-Status *	SBP EU RED-compliant
SBP EU RED II grandfathering	☒
Batch type selection *	Search Here
Product Type *	Search Here
Tonnage *	tonne (t)

This indicates that the biomass only meets the REDII sustainability and GHG emissions saving criteria, and should only be accepted in EU Member States applying the grandfathering rule.

For Traders and End-users

No additional action is required other than to ensure that the "SBP EU REDII grandfathering" box remains checked when reselling the biomass. This maintains the traceability of the original EU RED compliance basis throughout the SBP Chain of Custody.

Proof of Sustainability (PoS)

The operators shall ensure that the PoS attached to the purchase of REDII-certified biomass from operators certified against other EU-recognised voluntary schemes bear the required information.

SBP-certified operators selling REDII biomass to non SBP-certified operators and wishing to submit a PoS shall select the correct option of compliance.

Sustainability criteria of the biomass according to Article 29 of EU RED 2018/2001

The material complies with the sustainability criteria according to Art. 29 of 2018/2001 amended by EU Directive 2023/2413 ¹	☐ Yes	☐ No
The material complies with the sustainability criteria according to Art. 29 of 2018/2001 ¹	☐ Yes Grandfathering clause ONLY	☐ No
The raw material meets the definition of waste or residue according to the EU RED ²	☐ Yes	☐ No

7 Audit Portal

Operators applying REDII criteria shall report their findings in Annex 2a - EU REDII Supply Base Evaluation of the Supply Base Report.

8 Review and update

This interpretation will be reviewed regularly. Updates may be issued should additional EU Member States adopt the grandfathering provision or if the legal or policy framework changes.



Instruction Document REDII: Bridging requirements of the SBP scheme for meeting REDII and ISO 17065: Scope Change Audit for SBP REDII-compliant claim for Traders and End-users

Q: Is a Scope Change Audit required for a Trader or End-user to be able to receive or trade SBP-certified biomass with an SBP REDII-compliant claim?

A: *A Scope Change Audit is mandatory for a Trader or End-user to include SBP REDII in their certification scope. This requirement ensures compliance with the SBP framework for handling SBP-certified biomass with an SBP REDII-compliant claim. The following process must be adhered to:*

- **Audit record creation:** *The auditor is required to create a record for the scope change audit in the SBP Audit Portal. This step initiates the formal process of scope change.*
- **Carry out a Scope Change Audit:** *The auditor is required to evaluate that an organisation has established and implemented procedures to handle SBP REDII-compliant biomass. The audit may be conducted remotely, if properly justified by the Certification Body (CB) (justification needs to be included in PSR).*
- **Scope Change Public Summary Report (PSR) Creation:** *Concurrently, the auditor must create a scope change PSR for this specific audit. Notably, the scope change PSR is comprehensive and mirrors a full PSR. It automatically clones findings from the last PSR, allowing for modifications only where necessary to reflect relevant changes.*
- **PSR review and approval:** *The scope change PSR is then subject to a review and subsequent approval by the CB reviewer.*
- **Certificate record update:** *Following the approval of the PSR, the certificate record must be updated to include "Includes REDII." This update is reflected on the SBP website and serves as a public acknowledgement of the expanded scope of the certification.*

Rationale: This process ensures that no break occurs in the certified SBP REDII supply chain and ensures that Traders and End-users adhere to the EU specific requirements when handling EU REDII-compliant material. The Scope Change Audit and its accompanying procedures ensure that all necessary revisions to practices and documentation are thoroughly reviewed and approved, thereby upholding the integrity and credibility of the SBP certification.

Process Documents

Enforcement actions for Standard v2.0 post-transition deadline

Publication date: 31 October 2025

Effective date: 10 November 2025

1 Automatic suspension of non-transitioned certificates by SBP

Any SBP Certificate Holder that has not completed the transition to SBP Standards v2.0 by 9 November 2025 will be automatically suspended on 10 November 2025 at 12:00 UK time.

Suspension will be implemented by SBP and will entail:

- Change of certificate status to Suspended in the SBP Audit Portal and on the SBP website certificate registry.
- Relocation of suspended certificates to the Suspended Certificate Holders page.
- Ineligibility to share SBP transactions in the Data Transfer System (DTS).

2 Reinstatement conditions

Suspended certificates shall be reinstated by the Certification Body only after:

- A full audit against SBP Standards v2.0 has been completed.
- All required reports (PSR, SBR if applicable) have been finalised in Audit Portal.
- The certificate scope has been updated to v2.0 and updated certificate (pdf) uploaded to the SBP Audit Portal.

3 Certification Body oversight

Certification Bodies shall:

- Allocate resources for timely completion of transition audits including finalising public summary reports and updating Audit Portal.
- Monitor suspended clients and support completion of transition audits.
- Provide timely information about the status of transition to the SBP Secretariat upon request.

4 SBP Secretariat actions

The SBP Secretariat will:

- Enforce suspensions via the Audit Portal and DTS access controls.
- Continue providing technical support to Certification Bodies and Certificate Holders.
- Maintain public transparency on certificate status.

Document Development Procedure, Section 8.2.1

Revised SBP Standards: key dates

This interpretation summarises rules for the transition of Certificate Holders from the current SBP Standards (v1.0) to the revised Standards (v2.0). Defined dates and the timeframes associated with the implementation of a normative document in order of the events are as follows:

- *Approval date: the date on which an SBP normative document is approved by the decision-making body.*
- *Publication date: the date on which an approved SBP normative document is announced and published on the SBP website (within 60 days of the approval date).*
- *Effective date: the date on which a published SBP normative document becomes applicable for use (within 90 days of the publication date).*
- *Transition period: the period of time commencing on the effective date and continuing for 27 months. During the transition period, the new version of an SBP normative document is phased-in and the old version (where one exists) is phased-out, therefore, both versions are valid during that time and may be used by existing and new certificate holders. At the end of the transition period, only the new version is valid and any certificates issued against the old version are considered invalid. This means that even though both versions may be used during the transition period, it is highly recommended to switch to the new version at soonest opportunity and choose the new version of the Standards for new assessments.*

Document Development Procedure, Sections 8.5.1 and 8.5.2

Original text:

8.5.1 Where an urgent substantive change (either revision or new documents) to a Category 1 or 2 document is determined to be needed the Secretariat shall draft the document.

8.5.2 Urgent substantive changes to Category 3 and Category 4 documents may be implemented by the Secretariat.

Definition: *The term substantive change is defined under section 8.5. A change is an urgent substantive change when an immediate need for change is identified that is consistent with international best practice for standards development.*

The conditions under which these changes may be triggered are as per 8.5.1.2. A change that is likely to generate significant divergent stakeholder views is not suitable for development as an urgent substantive change under section 8.5. The procedure set out in section 8.5 shall only be used infrequently where a specific urgent need is identified.

Transition from credit-based system in SBP Standards v1.0 to the REDII-type mass balance system in revised SBP Standards v2.0 (following Instruction Document REDII: Bridging Requirements for Meeting REDII)

Background: SBP Standard 4 v1.0 relies on Chain of Custody (CoC) methods in SBP-approved CoC systems, such as FSC or PEFC. Both schemes use the concept of a so-called credit-based system, which follows the basic ‘units in = units out’ principle but has an important difference to the 12-month mass balance



period required in SBP Standard 4 v2.0 (which follows the REDII requirements¹). Under the FSC and PEFC credit-based systems, sustainability information ('credits') enters a credit account until the operator decides to sell physical material with some of those credits. If a customer does not require sustainability information, physical material can be sold, and the credits can stay in the credit account (e.g., in a virtual spreadsheet record). The transfer of sustainability credits is always with a physical flow of material and operators are never allowed to have a deficit in sustainability credits. But the amount of credits in an operator's credit account does not have to match the physical quantity of material on a site.

The use of this system has the potential to create a situation where Biomass Producers (BPs) may accumulate virtual stock of sustainability credits significantly exceeding their physical stock.

SBP Standard 4 v2.0 requires that to carry sustainability information over to the next mass balance period, a BP must have at least the same quantity of physical stock. The balance shall be achieved over either a 3 or 12-month period, depending on the type of feedstock used (as required by SBP Instruction Document REDII: Bridging Requirements for Meeting REDII (or the REDII Bridging Instruction Document)). While BPs will be allowed to have a negative balance during a mass balance period under the SBP Standard 4 v2.0, BPs will no longer be able to carry forward more balance than they have physical stock. Note that EU REDII compliance is compulsory for all Certificate Holders transitioning to v2.0.

This interpretation is intended to guide BPs on how to transition between these two systems.

Interpretation: *A BP shall document a plan for the transition from the credit-based system to the mass balance system, including the start date of the mass balance period. The BP may use available credits in its mass balance system up to the amount equivalent to the physical stock on the day preceding the first day of the established mass balance period. Note that, to make SBP-certified and EU RED claims on any physical stock after the transition date, those volumes must have been produced from feedstock procured in compliance with the SBP Standards v2.0 and the REDII Bridging Instruction Document. The physical stock at the beginning of the first mass balance period shall be allocated to its respective Product Group according to the rule in Standard 4 (v2.0), clause 4.12. Available sustainability credits (from the credit-based system) obtained prior to the transition date may be carried forward into the mass balance account (not exceeding the physical stock). In other words, in order to use physical inventory material in the new mass balance system, it shall be 'virtually' SBP-compliant (enough SBP credits) or SBP-controlled (not enough credits but can prove that all input was either FSC or PEFC controlled), and all physical inventory material shall also be SBP REDII-compliant.*

Example: *A BP transitions to the SBP Standards v2.0 on 1 September. The BP began procuring feedstock in compliance with the SBP Standards v2.0 and the REDII Bridging Instruction Document on 1 June. On 31 August, the BP had 1,000 tonnes in physical stock inventory, and a balance of 2,000 credits in their 'legacy' credit-based system. Of those 2,000 credits, 1,000 were from forest feedstock, and 1,000 were from processing residues feedstock. Therefore, the BP may either choose to carry over all 1,000 tonnes of forest*

¹ Please note that SBP requires SBP-compliant or SBP-controlled biomass to also conform to SBP REDII-compliant biomass requirements (i.e., follow REDII mass balance rules from the SBP REDII Bridging Instruction Document)



feedstock, or all 1,000 tonnes of processing residues feedstock, or some combination of the two (e.g., 500/500) so long as the total sustainability credits carried over do not exceed the physical stock of 1,000 tonnes. To claim this stock as EU RED-compliant, the BP shall demonstrate that the physical stock of 1000 tonnes complies with the REDII Bridging Document.