



Guidance Document

Guidance for Standard 4: Chain of Custody Stakeholder Engagement Plan

Sustainable Biomass Program

sbp-cert.org



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In the case of inconsistency between translations, the official English language version shall always take precedence.

SBP welcomes comments and suggestions for changes, revisions and / or clarifications on all of its Standards documentation. Please contact: info@sbp-cert.org

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A

Introduction

The Sustainable Biomass Program (SBP) is a certification scheme for woody biomass providing assurance that biomass is sourced legally and sustainably. It also offers a robust mechanism for collecting and communicating reliable, independently verified data, including energy data, throughout the supply chain. The scheme enables companies in the biomass sector to demonstrate responsible sourcing, meet regulatory requirements, and accurately calculate their greenhouse gas (GHG) emissions.

The SBP certification scheme is underpinned by six Standards that collectively define the requirements against which Organisations are assessed, as applicable, by independent, accredited third party Certification Bodies (CBs).

The Standards were developed and revised through a rigorous process aligned with the ISEAL Standard-Setting Code of Good Practice, and building on existing regulatory requirements, relevant voluntary certification scheme standards, and input from a wide range of stakeholders.

Organisations that demonstrate conformance with the applicable SBP Standards receive an SBP certificate and may be entitled to use the SBP Data Transfer System (DTS) and SBP claims in relation to the biomass they produce, sell, purchase, and/or use.

B

Purpose

This guidance document outlines the stakeholder engagement requirements embedded within the Sustainable Biomass Program (SBP) certification scheme. Its purpose is to support organisations, such as Biomass Producers, Traders, and End-users (collectively referred to as Certificate Holders), in understanding, implementing, and documenting stakeholder engagement practices that are required by the SBP Standards.

The document aims to clarify expectations, promote consistency in implementation, and support Certificate Holders (CHs) in meeting certification requirements while fostering trust, accountability, and continuous improvement. Guidance also supports Certification Bodies in their evaluation of relevant requirements.

C

Scope

Stakeholder engagement is already a well-established part of sourcing feedstock and evaluating supply bases. Therefore, this guidance does not reference Standard 2, but instead focuses on Standard 4, where stakeholder engagement related to activities directly influenced by Certificate Holders is less common and may require further guidance from SBP.

D How to use this document

This document is not a normative document. It serves as a supporting resource for current and prospective CHs. CHs may adopt different approaches that can achieve the intent of the SBP requirements provided they can demonstrate acceptable evidence as described in section 7 of this guidance.

E Normative references

SBP Standard 1: Feedstock Compliance
 SBP Standard 2: Feedstock Verification
 SBP Standard 3: Requirements for Certification Bodies
 SBP Standard 5: Collection and Communication of Data

F Glossary of terms and definitions

Stakeholders are individuals, groups, or organisations who have an interest in, are affected by, or may influence the activities, decisions, or outcomes associated with the Certificate Holder's operations and supply chains. This includes both directly and indirectly affected parties. Stakeholders may include, but are not limited to:

- Local communities and community representatives
- Workers, contractors, and labour representatives
- Indigenous Peoples and other rights-holders
- Landowners and land managers
- Environmental and social NGOs
- Governments and government authorities at local, regional, and national levels
- Industry bodies and associations
- Certificate Holders, their customers, and market participants
- Experts or technical specialists and academics with relevant knowledge of environmental, social, or economic impacts

Stakeholders may hold diverse perspectives and levels of influence. For the purposes of SBP certification, stakeholder engagement should encompass all groups whose rights, interests, or environments could be affected by the Certificate Holder's actions or decisions.

1 Why stakeholder engagement matters

1.1 Benefits of engaging with stakeholders

Stakeholder engagement within the certification process is a key step in managing not only sourcing risks, but also operational and reputational risks. It is a key tool to identify, map and act upon opportunities for continuous improvement. It is also a valuable opportunity to showcase the work done by the Certificate Holders (CH). Effective stakeholder engagement helps build trust between CHs and their communities.

Stakeholder engagement allows CHs to transparently and effectively engage with interested parties and directly affected stakeholder groups to ensure their operations and actions remain relevant to local conditions. Through these interactions, CHs can better identify risks, implement appropriate risk mitigation measures and avoid adverse impacts on stakeholders. Engaging with stakeholders also increases the likelihood of identifying innovative approaches and building support or acceptance for the CHs' activities.

1.2 Stakeholder engagement requirements of the SBP Standard

This table provides a summary of stakeholder engagement requirements across the SBP Standards (v2.0), including the exact wording of the requirement and to whom it applies. Whilst this table gives the broader overview, this guidance document focuses on Standard 4.

SBP Standard	Stakeholder engagement requirement (summarised)	Applicable to
Standard 1: Feedstock Compliance	Indicator 4.2.6 Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.	Biomass Producer
Standard 2: Feedstock Verification	Clauses 8.1-8.7 Stakeholder consultation is a mandatory part of the Supply Base Evaluation (SBE). Biomass Producers must engage stakeholders to identify sustainability risks and document their input in the SBE Public Summary.	Biomass Producer
Standard 3: Requirements for Certification Bodies	Clauses 7.8-7.11 Certification Bodies must confirm stakeholder engagement during audits by evaluating grievance mechanisms, consultation outcomes, and stakeholder comments. They should review all relevant information, including the Stakeholder Engagement Plan and SBP data, to guide the audit's focus and approach.	Certification Body
Standard 4: Chain of Custody	Clauses 1.14-1.18 Organisations must create and maintain a Stakeholder Engagement Plan (SEP) that fits their operations and certification scope. The SEP must include a complaints procedure with assigned responsibilities, timelines, and a	Biomass Producer / Trader / End-user

	<p>process for handling complaints. Organisations must keep evidence showing the SEP is implemented effectively (e.g., meeting notes, emails, participation records, responses to feedback). The SEP must be reviewed at least every five years and updated as needed. It must also be available in a language accessible to affected stakeholders.</p>	
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2 Assessing impacts and identifying stakeholders

2.1 Conducting a Preliminary Impact Assessment

Stakeholder engagement under SBP Standard 2, Clause 8 focuses on the Supply Base Evaluation (SBE), specifically engaging stakeholders to identify and assess risks related to feedstock sourcing. The engagement process supports the development of risk management measures (RMMs) and ensures that sourcing practices align with the sustainability requirements of SBP Standard 1. In contrast, SBP Standard 4, Clauses 1.14 to 1.18, address the Certificate Holder’s direct impacts on stakeholders, such as, noise from pellet production, dust and air pollution from biomass storage, traffic congestion and impact on local roads, and other operational effects on local communities. Here, the focus shifts from feedstock sourcing risks to the environmental, economic and social footprint of the Certificate Holder’s own activities.

To support the stakeholder engagement requirement of SBP Standard 4, a Preliminary Impact Assessment should be conducted. This is not a formal or an exhaustive study, but a practical tool to guide identification of relevant stakeholders. It involves reviewing planned operations and logistics, identifying potentially affected parties, and using local knowledge and context-specific data to assess relevant impact categories.

In accordance with SBP Standard 4, this assessment is designed to proactively identify and address potential issues related to the Certificate Holder’s operations, whilst also highlighting stakeholders whose interests are most pertinent and may influence overall operational effectiveness.

Types of impacts to consider (non-exhaustive list of examples):

Environmental Impacts

- Water pollution
- Soil contamination
- Transport-related dust and noise
- Biodiversity loss
- Harbour emissions
- Waste generation and mismanagement
- Noise and light pollution from the site

Social Impacts

- Displacement or disruption of local communities
- Impacts on Indigenous Peoples’ rights and land tenure
- Health and safety risks to workers
- Public health impact
- Noise and nuisance for communities
- Traffic and road safety issues
- Cultural heritage site disturbance

Economic Impacts

- Job creation or loss in local communities
- Harm to local small businesses

- Changes in land value or access to markets
- Local infrastructure strain or development
- Reduced economic resilience

Governance and Legal Impacts

- Conflicts over land ownership or use rights
- Non-compliance with national or international laws
- Transparency and accountability in decision-making
- Effectiveness of grievance mechanisms and dispute resolution

The following tools help ensure that the assessment is systematic, inclusive, and aligned with SBP's sustainability criteria and Chain of Custody requirements.

Tools and methods to consider:

- **Desk review:** review existing documents, for example, maps, environmental reports, legal frameworks, NGO publications, media reports.
- **Stakeholder conversations:** informal discussions with community members, landowners, NGOs, or local authorities to gather insights.
- **Site visits:** visit the area to observe land use, environmental conditions, impact occurrence, and community presence.
- **Complaint log review:** check if any past complaints or disputes exist related to the area or activity.
- **Focus groups:** Informal or structured focus groups are especially useful when engaging communities, workers, or interest groups who may be directly or indirectly affected by biomass operations.
- **Expert consultation:** informal or structured consultation with experts such as environmental, social scientists, legal, land-use, local government officials can help identify overlooked risks and strengthen the credibility of early-stage impact assessments.

Linking impacts to stakeholders is a crucial step in the stakeholder engagement process, as it helps to generate a targeted and prioritised list of relevant stakeholders. This ensures that engagement efforts are focused, meaningful and responsive to the real concerns and interests of those affected. Ultimately, by clearly linking impacts to the stakeholders they affect, CHs can engage more effectively, ensuring the right people are consulted about the right issues, and that their concerns are addressed in a way that is both respectful and impactful.

2.2 Stakeholder identification and prioritisation

This involves listing all relevant stakeholders (e.g. local communities, workers, NGOs, regulators, see below) and assessing their level of influence and how much they are affected by the CH's activities.

The CHs should carefully review the list of impacts identified during the Preliminary Impact Assessment. These might include issues such as dust and noise from truck movements, water usage and potential pollution, land use changes, or emissions from harbour activities. Each of these impacts

will likely affect different groups in different ways. For example, if trucks are passing through residential areas and creating dust or noise, the stakeholders most directly affected would be residents, nearby schools, or health authorities. If the operation involves significant water use, then farmers who rely on the same water sources may be impacted. Similarly, if biomass production involves labour-intensive processes, workers and labour unions become key stakeholders, particularly if there are concerns about working conditions or safety.

Once these connections are identified, the CHs should prioritise stakeholders based on two key factors: the degree to which they are affected by the impact, and their ability to influence the CH's operations or decisions. For instance, a community experiencing health issues due to dust exposure would be considered a high-priority stakeholder, as would a regulatory body overseeing water quality. Based on this process, it is possible that not all identified stakeholders will be engaged. After completing a Preliminary Impact Assessment, the next step in the stakeholder engagement process is to establish clear connections between the identified impacts and the relevant stakeholders.

A *stakeholder-impact matrix* or mapping tool can help visualise which stakeholders are connected to which impacts, and can guide the development of tailored engagement strategies. This documentation not only supports internal planning but also serves as evidence of conformance during SBP audits.

Potential stakeholders could be (non-exhaustive list):

Local communities living near production/storage facilities or transport routes

- Workers employed in production, handling and transport
- Labour unions representing workers' rights and interests
- Indigenous peoples whose land or cultural heritage may be impacted
- Biomass buyers such as energy companies or pellet traders
- Supply chain partners including hauliers, port operators, and storage facilities
- Government agencies and regulators overseeing trade, energy, forestry, land use, labour and environmental compliance, customs
- Environmental NGOs concerned with biodiversity, carbon emissions, and land use change
- Civil Society Organisations advocating for social justice, labour rights, sustainable development, transparency, or community rights
- Certification Bodies and auditors responsible for verifying compliance with SBP standards
- Industry and trade associations, such as biomass trade groups, renewable energy associations, forestry networks
- Academic and research institutions studying biomass sustainability and impacts
- Media and public interest groups that shape public perception and scrutiny
- Investors and financial institutions, such as ESG-focused investors, banks financing biomass projects, insurers

3 Planning engagement

3.1 Stakeholder Engagement Plan (SEP)

The series of actions an CH undertakes to engage with its stakeholders, including the tools used, the timing of activities, and the individuals responsible, are part of a Stakeholder Engagement Plan (SEP). The SEP is a proactive list of actions designed to address specific concerns or issues and to ensure stakeholder engagement is structured, purposeful and effective.

A successful SEP will help build trust and credibility, enhance transparency, identify and mitigate risks, contribute to social and economic development, and improve decision-making by leading to more informed and sustainable choices. CHs should be able to define their purpose, identify resources and have the means to achieve their goals.

An SEP is a structured approach outlining how a CH will engage with its stakeholders across its operations and activities. It ensures that engagement is purposeful, inclusive, and aligned with sustainability and certification goals, such as those set by the SBP Standards.

3.2 Choosing engagement methods

After linking impacts to stakeholders through a stakeholder-impact matrix, the next step is to determine the most appropriate engagement methods for each stakeholder group. The choice of method depends on the nature of the impact, the stakeholder's level of influence, and how directly they are affected.

Below are examples of various stakeholder groups and how they can be engaged:

Stakeholder Group	Methods	Examples of engagement
Local communities	Informal and formal engagement	Community meetings, local newsletters, door-to-door visits, public notices about truck routes and schedules
Workers and labour unions	Structured dialogue and internal communication	Worker briefings, safety meetings, suggestion boxes, grievance mechanisms
Indigenous Peoples	Culturally appropriate and respectful engagement	Meetings with community leaders, use of local languages, respecting traditional protocols
Government and regulatory bodies	Formal reporting and consultation	Compliance reports, participation in public hearings, written submissions
NGOs and civil society	Collaborative and transparent engagement	Workshops and webinars, joint monitoring initiatives, technical briefings, written submissions
Buyers and supply chain partners	Strategic and operational communication	Sustainability reports, regular updates, supplier meetings

4 Conducting engagement

4.1 Best practices for respectful and inclusive dialogue

Effective stakeholder engagement begins with respectful and inclusive dialogue. This means recognising the diversity of stakeholders, ranging from local communities and Indigenous Peoples to NGOs, landowners, and industry representatives, and ensuring that all voices are heard and valued. Engagement should be conducted in a manner that is culturally sensitive, non-confrontational, and open to differing perspectives. Facilitators should actively listen, avoid assumptions, and create safe spaces for dialogue, especially when discussing potentially contentious issues such as community impact.

Inclusivity also involves proactive outreach to under-represented or marginalised groups. This may require adjusting meeting formats, locations, or times to accommodate different needs, such as rural access, gender considerations, or language barriers. Where possible, engagement should be co-designed with stakeholders to ensure relevance and mutual respect. The goal is to build trust and foster long-term relationships that support the credibility and effectiveness of SBP-certified operations.

4.2 Communication tips

Clear, respectful, and accessible communication is essential for meaningful engagement. Language should be tailored to the audience; avoiding technical jargon when speaking with community members and using plain language or translated materials where needed. Tone should be neutral, constructive, and empathetic, especially when addressing concerns or grievances. Avoid defensive or dismissive language and instead focus on transparency and shared problem-solving.

Accessibility also extends to the format and delivery of information. Use multiple channels, such as in-person meetings, printed materials, email, and online platforms, to ensure stakeholders can engage in ways that suit their preferences and capacities. Consider visual aids, interpreters, or community liaisons where appropriate. The aim is to remove barriers to participation and ensure that all stakeholders can understand and contribute meaningfully to the engagement process.

4.3 Recording and documenting feedback

Accurate and transparent documentation of stakeholder feedback is a key requirement under the SBP Standards. All engagement activities should be recorded, including meeting dates, participants, discussion points, and outcomes. Feedback, whether verbal, written, or informal, should be summarised and categorised (e.g., concerns, suggestions, support) and linked to relevant actions or decisions taken by the organisation.

Documentation should be stored securely and made available for audit purposes. Summaries of stakeholder input and responses should be included in public reports, such as the Supply Base Report (SBR) and Certification Body Public Summary Report (PSR). This not only demonstrates compliance but also reinforces accountability and builds trust with stakeholders by showing that their input has been considered and acted upon.

4.4 Managing expectations

Managing expectations is critical to maintaining constructive relationships with stakeholders. CHs should clearly communicate the scope and limitations of engagement, which decisions are open to influence, which constraints exist, and which outcomes are realistically achievable. Avoid overpromising or implying that all feedback will result in immediate changes; instead, be honest about what can be done and provide timelines for follow-up.

It is also important to explain how stakeholder input will be used and how decisions will be made. Providing updates on progress, outcomes, and next steps helps maintain transparency and shows respect for stakeholders' time and contributions. Where concerns cannot be addressed immediately, organisations should acknowledge them and commit to revisiting them as part of ongoing engagement or future reviews.

5 Responding to stakeholder input

5.1 How to analyse and incorporate feedback

Analysing stakeholder feedback involves identifying key themes, concerns, and suggestions raised during engagement activities. Feedback should be categorised (e.g., environmental risks, social concerns, operational suggestions) and assessed for relevance, urgency, and potential impact on SBP compliance. CHs should use structured methods to track input and link it to specific actions or decisions. Where feedback highlights risks or gaps in the Supply Base Evaluation (SBE), it should trigger a review of risk assessments and risk management measures.

Incorporating feedback means integrating stakeholder perspectives into decision-making processes. This may involve revising sourcing plans, updating management procedures, improving technology or processes, or enhancing grievance mechanisms. Importantly, CHs should document how feedback was considered and what changes were made as a result. This not only supports SBP audit requirements but also demonstrates accountability and responsiveness to stakeholder concerns.

5.2 Reporting back to stakeholders

Closing the feedback loop in a meaningful timeframe is essential for maintaining trust and transparency. After analysing stakeholder input, CHs should report back to stakeholders on how their feedback was received, evaluated, and acted upon. This can be done through follow-up meetings, written summaries, newsletters, or updates to public documents. The format and language should be accessible and tailored to the audience.

Reporting should include both actions taken and rationale for decisions where feedback could not be implemented. Acknowledging all contributions, even those not adopted, shows respect and reinforces the value of stakeholder participation. Where appropriate, organisations should also share timelines for future engagement or review, helping stakeholders understand the ongoing nature of the process.

5.3 Conflict resolution and grievance mechanisms

SBP Standards require CHs to maintain effective grievance mechanisms as part of their stakeholder engagement strategy. These mechanisms should be clearly communicated to stakeholders and provide accessible channels for raising concerns or disputes. Key elements include designated contact points, timelines for response, procedures for investigation, and documentation of outcomes.

Conflict resolution should be guided by principles of fairness, transparency, and cultural sensitivity. Where disputes involve Indigenous rights or land tenure, CHs should try to follow recognised protocols such as Free, Prior and Informed Consent (FPIC). All grievances and resolutions should be recorded and reviewed periodically to identify patterns and improve engagement practices. A well-functioning grievance system not only supports SBP compliance but also strengthens stakeholder relationships and reduces reputational risk.

6 Monitoring and continuous improvement

6.1 Indicators of effective engagement

Effective stakeholder engagement can be measured through both qualitative and quantitative indicators. Key indicators include active participation from a diverse range of stakeholders, constructive dialogue, and evidence that feedback has influenced decision-making. Quantitative indicators may include the number of stakeholders consulted, frequency of engagement activities, and grievance resolution rate. Qualitative indicators might involve stakeholder satisfaction, trust levels, and the perceived fairness of the process.

CHs should also monitor whether engagement has led to improved sustainability outcomes, such as reduced environmental risks, enhanced community relations, or better alignment with SBP criteria. Regularly reviewing these indicators helps ensure that engagement is not just a compliance exercise, but a meaningful contributor to responsible biomass sourcing.

6.2 Internal review and learning

Internal review is essential for identifying strengths, weaknesses, and opportunities for improvement in stakeholder engagement practices. CHs should periodically assess their engagement processes, tools, and outcomes, involving relevant staff and, where appropriate, external facilitators. This review should consider whether engagement activities were inclusive, well-documented, and responsive to stakeholder concerns.

Learning from past engagements, both successes and challenges, can inform future strategies. For example, if certain stakeholder groups were under-represented or feedback was not adequately addressed, these gaps should be acknowledged and corrected. Embedding stakeholder engagement into organisational learning cycles helps build capacity, improve relationships, and enhance the overall effectiveness of SBP compliance efforts. The internal review process of engagement activities should be done periodically in a timeframe that fits with internal processes such as strategy reviews or following significant changes of operations. This internal audit tends to take place at a minimum on a yearly basis and on a maximum at a five-year period.

6.3 Updating engagement plans over time – the importance of a periodic review

SBP Standard 4 requires CHs to review and adapt their SEP at least every five years. However, more frequent reviews may be necessary in response to significant changes, such as new stakeholders, emerging risks, or regulatory updates. Periodic reviews ensure that engagement remains relevant, inclusive, and aligned with current sustainability priorities. Updating the SEP should involve reflecting on past engagement outcomes, incorporating lessons learned, and consulting stakeholders on proposed changes. At a minimum, CHs are advised to review their current SEP on a yearly basis with regards to the evolution of their activities, processes and operations and of the relevance of the stakeholders included. This process reinforces transparency and demonstrates a commitment to continuous improvement. A dynamic and responsive SEP not only supports SBP certification but also strengthens stakeholder trust and long-term sustainability performance.

7 Alignment with certification requirements

7.1 How Certificate Holders and Certification Bodies can demonstrate compliance

Biomass Producers can demonstrate compliance with SBP stakeholder engagement according to SBP Standard 2 requirements by integrating engagement activities into their Supply Base Evaluation (SBE) and broader management systems. This includes conducting meaningful consultations with relevant stakeholders, such as local communities, Indigenous Peoples, NGOs, and landowners, and documenting how their input has influenced risk assessments and mitigation strategies. This process is well-established with Biomass Producers.

When it comes to SBP Standard 4, all CHs can demonstrate compliance with SEP requirements by integration of any outcomes from the stakeholder engagement activities into the Chain of Custody management system procedures. Compliance also involves maintaining a transparent and accessible grievance mechanism, ensuring that stakeholders have a formal channel to raise concerns and receive timely responses. CHs should be able to present evidence during audits that stakeholder engagement was inclusive, well-documented, and responsive.

Certification Bodies will assess whether engagement activities meet the requirements outlined in SBP Standards and will describe it in the audit report.

7.2 Acceptable evidence

To support certification, organisations should maintain a clear and organised record of stakeholder engagement activities. Stakeholder engagement activities to meet requirements of SBP Standard 2 and SBP Standard 4 may be combined in the same set of documents and records. Nevertheless, it is important to remember that SBP Standard 2 is covering feedstock sourcing and SBP Standard 4 CH's own activities and impacts. Furthermore, as impacts are typically site-specific, each CH, including those within corporations operating multiple locations, should possess an SEP tailored to its distinct circumstances.

Acceptable evidence on a CH level could include:

- **Stakeholder Engagement Plan (SEP)** that includes impact assessment and stakeholder lists with contact details, categories (e.g., community, NGO, government), method of engagement, when activities took place, engagement outcome and any actions

AND

- Meeting minutes or summaries from engagement, including dates, locations, participants, and discussion points

OR

- Correspondence records, such as emails, letters, or feedback forms

OR

- Public summaries of the SBE that reflect stakeholder input and how it was addressed

OR

-
- Grievance logs showing complaints received, actions taken, and outcomes

OR

- Evidence of FPIC processes, where relevant, including signed agreements or consultation reports.

These materials should be made available during audits and, where appropriate, shared publicly to demonstrate transparency and accountability.

Maintaining this documentation not only supports SBP compliance but also strengthens stakeholder trust and the credibility of certified biomass operations.