



Supporting Document

Instruction Document 1A: **Stakeholder comments SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF)**

April 2026

Sustainable Biomass Program

sbp-cert.org



1 Classification and definitions of feedstock types

Biomass type	Feedstock category	Product Group	Origin	Feedstock type
Woody biomass	Primary	Forest	Final harvest from (semi-) natural forests	High grade stemwood
			Final harvest from plantations	Low grade stemwood
			Thinning from (semi-)natural forests	Forest residues with stumps
			Thinning from plantation forests	Forest residues without stumps
		Trees outside forests (TOF) – Urban and landscape feedstock	Landscape	End-of-life trees
			Urban, domestic and infrastructure	Salvage trees
	Trees outside forests (TOF) – Agricultural land feedstock	Woody residues from agricultural land (Orchards, vineyards, nuts and other woody crops, agro-forestry)	Trees removed for nature conservation	
		Woody energy crops (i.e. woody biomass), short rotation coppice	Low grade stemwood	
	Processing residues	n / a	Processing residues	Tree residues with stumps
	Post-consumer	n / a	Post-consumer waste	Tree residues without stumps

Feedback 1

in the revised version 3.3.1 is applicable for all feedstock groups. Should 'High grade stemwood' then be included as feedstock type for both TOFs?

SBP: Thank you for the comment. Following public consultation and further analysis with SBP governance bodies, the applicability of indicator 3.3.1 has been reverted to N/A. The question of including High-grade stemwood for both TOFs is indeed relevant. However, implementing this change would require updates to ID 5E and potentially touch other linked elements. Because of that broader impact, which is outside of the agreed scope of the revision, we will keep this proposal for the next revision cycle rather than incorporate it now.

2 Applicability of Standard 1 requirements to different types of TOF feedstock

Guidance for the table below:

Indicators marked with "YES" specify an indicator that is applicable to the respective feedstock source, while indicators marked with "N / A" are not applicable to the feedstock source in question.

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 residues	Primary production of the agriculture	Woody energy crops, short rotation coppice
1. Principle 1 – Feedstock is legally sourced					
1.1. Operators and operations are legal					
1.1.1. Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.	YES	YES	YES	N / A	YES
1.1.2. Legal ownership of land and resource use rights shall be respected.	YES	YES	YES	YES	YES
1.1.3. Feedstock shall be legally harvested, supplied and produced, including in compliance with applicable legal trade requirements (for example, CITES, EUTR/EUDR or others).	YES	YES	YES	N / A	YES
1.1.4. Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.	YES	YES	YES	N / A	YES

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1.1.5. There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.	N / A	N / A	YES	N / A	N / A
2 Principle 2 – Feedstock sourcing does not harm the environment					
2.1 Biodiversity is maintained or enhanced					
2.1.1. Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	YES	N / A	YES	YES	YES
2.1.2. Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.	YES	N / A	YES	YES	YES
2.1.3. Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	YES	N / A	YES	YES	YES
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

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Feedback 2	It is not possible to produce biomass from agricultural residues that come from a primary forest, provided that the requirement of no change in land use is respected (principles 2.2.1).		SBP: Thank you for the comment. The intent of this indicator is specifically to prevent any form of deforestation after 2008. For that reason, agricultural residues derived from areas that were primary forest after this cut-off date cannot be considered eligible biomass, even if no land-use change occurs at present. The requirement ensures that no biomass is sourced from land that would have led to the conversion of forest after 2008, fully aligning with the no-deforestation principle and the broader sustainability objectives of the scheme.		
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
2.2.3. Soil quality in the Supply Base shall be maintained or enhanced.	YES	N / A	YES	YES	YES
2.2.4. Where the removal of harvest forest residues, stumps, and/or roots is allowable and occurs, adverse impacts on the ecosystems shall be minimised.	YES	N / A	YES	N / A	YES
2.2.5. Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	YES	N / A	YES	YES	YES
2.2.6. Emissions to air shall comply with national legislation or in the absence of national legislation with industry best practice.	YES	YES	YES	N / A	YES
2.2.7. Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.	N / A	N / A	YES	YES	YES

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2.2.8. Waste shall be disposed of in an environmentally appropriate manner.	YES	YES	YES	N / A	YES
2.2.9. Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.	N / A	N / A	N / A	N / A	N / A
2.2.10. Harvested areas shall be regenerated.	YES	N / A	N / A	N / A	N / A
Feedback 3	For “yes” text: For instance, abandoned agricultural lands or single trees on agricultural land are considered landscape biomass. How shall the regeneration requirement be applied in such cases?		SBP: Thank you for the comment. The question of how regeneration requirements should apply in cases such as abandoned agricultural land or single trees on agricultural land is important, and we agree that it needs a deeper assessment. We will take this point forward and review it in more detail during the next revision cycle.		
Feedback 4	I want to add a comment for indicator 2.2.10 but technically it shows up in 2.2.9. Regarding indicator 2.2.10. I recommend as follows for "Agricultural Land": Do not default to “N/A”. Determine the outcome using the Land Use Classification together with an assessment of whether the crop (e.g., Christmas trees, rubber trees, plantation crops) has been in active production within a reasonable look-back period (e.g., the past 2-5 years). If the crop has not been actively produced in that period, do not assess it under ID1A (TOF); instead, consider if it aligns with FAO forest definition and classify it as forest feedstock.		SBP: Thank you for the comment. We will take this point forward and review it in more detail during the next revision cycle.		

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2.2.11. The impacts of natural processes such as fires, pests and diseases shall be managed.	N / A	N / A	N / A	N / A	N / A
Feedback 5	Regarding indicator 2.2.11: Will advocate for YES for agricultural feedstock, not N/A		SBP: Thank you for the comment. We will take this point forward and review it in more detail during the next revision cycle.		
2.2.12. Genetically modified trees shall not be used.	N / A	N / A	YES	YES	YES
2.2.13 Harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located.	N / A	N / A	N / A	N / A	N / A
2.2.14 Harvesting is carried out in compliance with locally and ecologically appropriate retention thresholds for deadwood extraction.	N / A	N / A	N / A	N / A	N / A
3 Principle 3 – Feedstock is only sourced from Supply Bases where the forest carbon stock is stable or increasing long term					
3.1 Feedstock sourcing complies with REDII requirements for LULUCF emissions					
3.1.1. LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest	YES	YES	YES	YES	YES

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<p>are counted towards the country’s commitment to reduce or limit greenhouse gas emissions, or</p> <p>Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and providing there is evidence that reported LULUCF-sector emissions do not exceed removals, or</p> <p>Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests’ capacity to act as a carbon sink is stable or increasing over the long term.</p>					
3.2 Carbon stocks in the forest area of the Supply Base are stable or increasing in the long term					
<p>3.2.1. All feedstock sourcing shall be consistent with either of these two options:</p> <p>Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing. or</p> <p>Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.) and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.</p>	N / A	N / A	N / A	N / A	N / A

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3.2.2. Primary feedstock shall not be sourced from forest areas where site productivity is low, and according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.	N / A	N / A	N / A	N / A	N / A
3.2.3 Primary feedstock shall not be sourced from primary forest, old-growth forests, heathland forming a climax stage or natural highly biodiverse grassland.	Yes	Yes	Yes	Yes	Yes
3.2.4 Primary feedstock may be sourced from highly biodiverse forests, peatlands, wetlands, or non-natural highly biodiverse grasslands only when evidence demonstrates that sourcing does not risk diminishing the conservation values.	Yes	Yes	Yes	Yes	Yes
3.3 Feedstock sourcing shall not compete with wood sourcing for long-lived wood products					
3.3.1. Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.	N / A	N / A	N / A	N / A	N / A
Feedback 6	it's uncommon to produce high quality stem wood from TOF because it isn't the scope of this trees. Production of energy of this wood respect cascade use principles because there are not production of high quality stem		SBP: Thank you for the clarification. You are right — it is uncommon to produce high-quality stemwood from TOF, as this is generally not within the purpose or management scope of these trees. Using TOF material for energy therefore remains consistent with the cascade use principles, since TOF does not typically generate high-quality stemwood suitable for material uses.		

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4 Principle 4 – Feedstock sourcing benefits people and communities					
4.1 Decent working conditions are provided, and labour rights are safeguarded					
4.1.1. Freedom of association and the right to collective bargaining shall be respected in the workplace.	YES	YES	YES	YES	YES
4.1.2. Forced or compulsory labour shall not be used.	YES	YES	YES	YES	YES
4.1.3. Child labour shall not be used.	YES	YES	YES	YES	YES
4.1.4. Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.	YES	YES	YES	N / A	YES
4.1.5. Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded.	YES	YES	YES	N / A	YES
4.1.6. Working hours shall comply with legal requirements.	YES	YES	YES	N / A	YES
4.1.7. Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits and workers’ compensation.	YES	YES	YES	N / A	YES
4.1.8. 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.	YES	YES	YES	N / A	YES
4.1.9. Mechanisms shall be in place for resolving grievances and disputes in the workplace.	YES	YES	YES	N / A	YES

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4.1.10. Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.	YES	YES	YES	N / A	YES
4.2 Feedstock sourcing benefits communities					
4.2.1. Negative social and community impacts shall be identified and avoided.	YES	YES	YES	YES	YES
4.2.2. Feedstock sourcing shall positively contribute to the local economy, including employment.	N / A	N / A	YES	YES	YES
4.2.3. Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced.	N / A	N / A	YES	YES	YES
4.2.4. Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.	YES	N / A	YES	YES	YES
4.2.5. Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.	YES	YES	YES	YES	YES
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.	YES	N / A	YES	N / A	YES
4.2.7. Designated cultural heritage sites shall be preserved.	YES	YES	YES	YES	YES

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Confidential Comments

These comments are not linked to specific text in the document.

Comment 7

Indicator 3.3.1 refers to high grade stemwood, and is applicable to all five columns. However, high grade stem wood is still absent in classification of TOF.

SBP: Thank you for your comment. Following public consultation and further analysis with SBP governance bodies, the applicability of indicator 3.3.1 has been reverted to N/A. The point raised regarding the classification of high-grade stemwood within the TOF framework has been noted and will be reviewed in more detail during the next revision cycle.

Comment 8

The case where high grade stemwood is: 1) from agricultural lands that are not forest according to national legislation, and thus - TOF; 2) used for sawmilling, veneer or furniture production, and processing residues are used for pellets; 3) a subject for SBE when it does not originate from recognized forest scheme --- still not covered in this standard version, neither in the classification of TOF, nor in Glossary, and nowhere else

SBP: Thank you for the comment. We will take this point forward and review it in more detail during the next revision cycle.