



# Normative Interpretations for SBP Standards v2.1

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**The promise of good biomass**





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NOTE1: Interpretations concerning Instrument Documents and Guidance Documents can be found in the section of the relevant Standard.

NOTE2: Interpretations related to Standards v2.0 were mostly integrated into Standards v2.1. This document only includes interpretations which remain relevant for Standards v2.1

The latest additions are highlighted in a coloured box.



# Glossary

Currently no interpretation matters have been published for Glossary.



# Standard 1: Feedstock Compliance

Currently no interpretation matters have been published for Standard 1.



# Standard 2: Verification of SBP-compliant Feedstock

## Clause 7.1

7.1 The Organisation shall develop a Risk Management Plan (RMP) that includes Risk Management Measures (RMMs) for each Indicator rated as specified risk within its SBE, per the CRA or an SBP RRA, with the objective of mitigating the risk and reducing 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) that includes Risk Management Measures (RMMs) for each Indicator rated as specified risk within its SBE, per the CRA or an SBP RRA, with the objective of mitigating the risk and reducing the risk rating to low risk.



7.2 The Organisation shall implement any RMMs marked as mandatory in SBP RRAs or other normative documents.

**Clarification:** *The term ‘SBP 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 RRA for the said region is published. If any of the risk ratings in the final SBP 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 RRA and will be subject to verification during the Certification Body’s surveillance audit. If the transition to the SBP RRA is not completed, the CB shall raise a major non-conformance.*



## Standard 3: Requirements for Certification Bodies

Currently no interpretation matters have been published for Standard 3.



## Standard 4: Chain of Custody

Currently no interpretation matters have been published for Standard 4.



## Standard 5: Collection and Communication of Data

Currently no interpretation matters have been published for Standard 5.



# Standard 6: Energy and Carbon Balance Calculation

Currently no interpretation matters have been published for Standard 6.



# Instruction Document SBP 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"

The screenshot shows a web form for creating a transaction. The fields are as follows:

- 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 \*: [input field] 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.

The screenshot shows a table with sustainability criteria and checkboxes:

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 <sup>1</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
The material complies with the sustainability criteria according to Art. 29 of 2018/2001 <sup>1</sup>	<input type="checkbox"/> Yes <b>Grandfathering clause ONLY</b>	<input type="checkbox"/> No
The raw material meets the definition of waste or residue according to the EU RED <sup>2</sup>	<input type="checkbox"/> Yes	<input type="checkbox"/> 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.



# Process Documents

## **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.*