



Supporting Document

Stakeholder comments SBP Standard 1: Feedstock Compliance

April 2026

Sustainable Biomass Program

sbp-cert.org



No.	SBP Standard 1 v2.0	Revision	SBP Standard 1 v2.1	Rationale for change
Principle 1 Feedstock is legally sourced				
Criterion 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.	No change	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.	N/A
1.1.2	Legal ownership of land and resource use rights shall be respected.	No change	Legal ownership of land and resource use rights shall be respected.	N/A
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.	Revised	Feedstock shall be legally harvested, supplied and produced, including in compliance with applicable legal trade requirements (for example, CITES, EUTR/EUDR or others).	The indicator was updated to explicitly reference the EU Deforestation Regulation (EUDR) to ensure the requirement reflects the current legal landscape for sustainable, legally compliant feedstock sourcing.
Feedback 1	Removing the EUTR references might not help if companies get an EUTR inspection in 2026 or if EUDR gets delayed again and EUTR inspections are performed. Company had an EUTR inspection this year and the fact that SBP covers a lot helped. I think it would be less strong if EUTR is not explicitly mentioned.		SBP: Thank you for your comment and for sharing your experience regarding EUTR. We appreciate the practical insight that SBP's alignment with EUTR has provided value during compliance checks. In the revised Standard, we have updated Indicator 1.1.3 to ensure that all applicable legal trade requirements are covered, including EUTR, where it remains in force or is still being enforced during transitional periods, as well as EUDR requirements once fully implemented. We believe this approach maintains the requirement's strength while ensuring future-proof alignment with evolving EU legislation.	
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.	No change	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.	N/A
1.1.5	There shall be adequate protection of the Supply Base from unauthorised and illegal	No change	There shall be adequate protection of the Supply Base from unauthorised and illegal	N/A

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	activities, such as illegal logging, mining, and encroachment.		activities, such as illegal logging, mining, and encroachment.	

Principle 2 Feedstock sourcing does not harm the environment

Criterion 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.	No change	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	N/A
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.	No change	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.	N/A
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.	No change	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	N/A

Criterion 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: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.	No change	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: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.	N/A
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No.	SBP Standard 1 v2.0	Revision	SBP Standard 1 v2.1	Rationale for change
Feedback 2	Regarding indicator 2.2.1: Please consider including a description of conversions which are SBP-acceptable. Conversions to consider could be conversion of forest for infrastructures project like roads, windmills, transport logistical centers, residential areas. Also please consider if conversion shall be accompanied by compensation forest e.g. 2-4 times the converted area + ecosystem/biodiversity consideration. Clarification could be made in the Guidelines to Std 1.		SBP: Thank you for sharing your comments and views. The topic is relevant and has been recorded for further analysis and will be considered for future revision.	
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	No change	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.	N/A
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced.	No change	Soil quality in the Supply Base shall be maintained or enhanced.	N/A
Feedback 3	Comment for indicator 2.2.3: Please consider aligning this indicator with EU REDIII criteria 29(6) (iv)		SBP: Thank you for your comment Aligning with REDIII criteria 29(6) (iv) has been achieved with implications on several indicators, including 2.2.4 and the inclusion of two new indicators, 2.2.13 (maximum threshold for large clear-cuts), and 2.2.14 (retention thresholds for deadwood extraction)	
2.2.4	Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.	Revised	Where the removal of harvest forest residues, stumps, and/or roots is allowable and occurs, adverse impacts on the ecosystems shall be minimised.	Alignment with REDIII sustainability criteria
Feedback 3	Comment for indicator 2.2.3: Please consider aligning this indicator with EU REDIII criteria 29(6) (iv)		SBP: Thank you for your comment. Alignment with EU RED III Article 29(6)(iv) has been addressed in SBP v2.1 through updates across relevant indicators, including 2.2.4, where roots have been explicitly included.	
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	No change	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	N/A
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.	Revised	Emissions to air shall comply with national legislation or, in the absence of national legislation, with industry best practice.	To improve the language

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Feedback 4	This should be 'Emissions to air', as written it suggests emissions of air, ie the mixture of gases that forms the Earth's atmosphere.		SBP: Thank you for your comment. The indicator has been updated to correctly refer to "emissions to air", ensuring clarity and consistency in terminology.	
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.	No change	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
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.	No change	Waste shall be disposed of in an environmentally appropriate manner.	N/A
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.	No change	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
2.2.10	Harvested areas shall be regenerated.	No change	Harvested areas shall be regenerated.	N/A
Feedback 5	We believe this point should be revised in relation to areas needed for strengthening national military defense, where forest regeneration is not planned due to such use (e.g., reinforcement of national borders, construction of military training grounds). Furthermore, this should apply to both production forests and protected areas, regardless of the biological value of the territory. Global events are forcing a reassessment of priorities, and national defense capabilities are critically important to ensure the long-term implementation of SBP standard requirements, while maintaining the national policy framework and, consequently, the direction of sustainable management supported by certificate holders in the country.		SBP: Thank you for sharing your comments and views. The topic is relevant and has been recorded for further analysis and will be considered for future revision.	
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.	No change	The impacts of natural processes such as fires, pests and diseases shall be managed.	N/A
2.2.12	Genetically modified trees shall not be used.	No change	Genetically modified trees shall not be used.	N/A

No.	SBP Standard 1 v2.0	Revision	SBP Standard 1 v2.1	Rationale for change
2.2.13	N/A	New	Harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located.	Alignment with REDIII sustainability criteria
Feedback 3	Comment for indicator 2.2.3: Please consider aligning this indicator with EU REDIII criteria 29(6) (iv)		SBP: Thank you for your comment. Based on the consultation feedback, SBP has introduced new indicators 2.2.13 and 2.2.14 to fully align with EU RED III Article 29(6)(iv), addressing harvesting practices related to soil quality, biodiversity, and sustainable forest management.	
2.2.14	N/A	New	Harvesting is carried out in compliance with locally and ecologically appropriate retention thresholds for deadwood extraction.	Alignment with REDIII sustainability criteria
Feedback 3	Comment for indicator 2.2.3: Please consider aligning this indicator with EU REDIII criteria 29(6) (iv)		SBP: Thank you for your comment. Based on the consultation feedback, SBP has introduced new indicators 2.2.13 and 2.2.14 to fully align with EU RED III Article 29(6)(iv), addressing harvesting practices related to soil quality, biodiversity, and sustainable forest management.	

Principle 3 Feedstock is only sourced from Supply Bases where the forest carbon stock is stable or increasing in the long term.

Criterion 3.1 Feedstock sourcing is consistent with international requirements for land use, land-use change and forestry (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	No change	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	N/A
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	<p>use which ensure the changes in carbon stock associated with biomass harvest 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 provided 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>		<p>use which ensure the changes in carbon stock associated with biomass harvest 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 provided 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>	

Criterion 3.2 Carbon stocks in the forest area of the Supply Base are stable or increasing in the long term.

3.2.1	<p>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</p>	No change	<p>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</p>	N/A
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No.	SBP Standard 1 v2.0	Revision	SBP Standard 1 v2.1	Rationale for change
	etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.		etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.	
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.	No change	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
3.2.3	Primary feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).	Revised	Primary feedstock shall not be sourced from primary forest, old-growth forests, heathland forming a climax stage or natural highly biodiverse grassland.	Alignment with REDIII concerning designated no-go areas. Additionally, alignment ensures consistency between the RRA conducted for SBP Standard 1 indicators and the REDIII Level A Risk Assessment.
Feedback 6	The old 3.2.3 was one of the more unclear indicators in v 2.0, as can also be seen by the very diverse set of mitigations that has been implemented from different operators. The new text, along with the new 3.2.4 is much clearer and the division between complete "no go" areas and the areas requiring extra considerations is good. Better alignment with RED III is also very helpful - also in reducing the extra requirements in the RED III annex.		SBP: Thank you for your positive feedback. SBP notes the improved clarity achieved through the revised wording of indicators 3.2.3 and 3.2.4, including the distinction between no-go areas and areas requiring additional safeguards. The term "forming a climax stage" has been added to clarify the scope of heathlands covered, aligned with EU RED III and Copernicus definitions, and to avoid misinterpretation.	
Feedback 7	PFOG, heathland and natural highly biodiverse grassland being used as a proxy for HCV and high carbon stocks. As this criterion is focusing on carbon stocks, it is suggested to remove the mentioning of specific biomes as it limits the scope of the criterion. There appears to be misalignment between this criterion and 3.2.4		SBP: Thank you for the comments. We acknowledge that this indicator is technically associated with biodiversity. However, as these conservation measures play an important role in maintaining carbon balance, we have decided to keep them within this section.	
Feedback 8	Seems indicator 3.2.3 attempts to align with RED III, however, "highly biodiverse forests" are not mentioned. Was that intentional? RED III Article 29 - paragraph 6 (a) (vi) states "that forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in paragraph 3, points (a), (b), (d) and (e), paragraph 4, point (a), and paragraph 5, respectively under the same conditions of determination of the status of land specified in those paragraphs"		SBP: Thank you for your comment. While highly biodiverse forests are not classified as no-go areas under EU RED III, the comment was considered relevant. As a result, highly biodiverse forests have been explicitly added to indicator 3.2.4, improving alignment with EU RED III Article 29(6)(a)(vi).	

No.	SBP Standard 1 v2.0	Revision	SBP Standard 1 v2.1	Rationale for change
	whereby paragraph 3 (b) references “highly biodiverse forests”. “Highly biodiverse forests are not mentioned in the SBP requirements - is that intentional?			
Feedback 9	The term primary forest shall be clearly defined as it may confuse different parties without the explanation.		SBP: Thank you for your comment. The definition of “primary forest” has been added to the Glossary and aligned with EU RED III to ensure clarity and consistent interpretation.	
Feedback 10	While in effort to preserve these ecosystems, exclusion of these ecosystems from market access eliminates a tool to achieve restoration. Hands off is not the solution but rather well thought out management.		SBP: Thank you for your comment. SBP acknowledges the broader discussion on ecosystem management and restoration. In this case, the revision is driven by the need to align consistently with the regulatory requirements of EU RED III, which set clearly defined objectives. The update aims to ensure coherence between the SBP framework and RED III while maintaining transparency and regulatory compliance.	
3.2.4	N/A	New	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.	Alignment with REDIII concerning restricted areas. Additionally, alignment ensures consistency between the RRA conducted for SBP Standard 1 indicators and the REDIII Level A Risk Assessment.
Feedback 11	3.2.4 and 3.3.4 are identical		SBP: No additional change required.	
Feedback 12	...risk diminishing the conservation values such as controlled sources, approved SFM or smallholder plantation		SBP: Thank you for your comments and bringing suggestions to clarifying the conservation values which could add insight to a guidance document.	
Feedback 13 same with 8	Seems indicator 3.2.3 and 3.2.4 attempts to align with RED III, however, “highly biodiverse forests” are not mentioned. Was that intentional? RED III Article 29 - paragraph 6 (a) (vi) states “that forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in paragraph 3, points (a), (b), (d) and (e), paragraph 4, point (a), and paragraph 5, respectively under the same conditions of determination of the status of land specified in those paragraphs” whereby paragraph 3 (b) references “highly biodiverse forests”. “Highly biodiverse forests are not mentioned in the SBP requirements - is that intentional?		SBP: Thank you for your comment. The indicator has been revised to explicitly include “highly biodiverse forests”, strengthening alignment with EU RED III Article 29(6)(a)(vi) and ensuring consistent interpretation of the requirements.	

No.	SBP Standard 1 v2.0	Revision	SBP Standard 1 v2.1	Rationale for change
Feedback 14	This is good approach! Justification and evidence-based approach is necessary though.		SBP: Thank you for your positive feedback. The justification- and evidence-based approach is implemented through supply base verification and the outcomes of applicable mitigation measures as required by SBP Standard 2.	

Criterion 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.	No change	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
Feedback 15	“substantial demand” - Is this open term? To be decided by the BP?		SBP: Thank you for your comment. The term “substantial demand” is intentionally open and is assessed by the Biomass Producer based on Supply Base-specific conditions, subject to verification during certification.	

Principle 4 Feedstock sourcing benefits people and communities.

Criterion 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.	No change	Freedom of association and the right to collective bargaining shall be respected in the workplace.	N/A
4.1.2	Forced or compulsory labour shall not be used.	No change	Forced or compulsory labour shall not be used.	N/A
4.1.3	Child labour shall not be used.	No change	Child labour shall not be used.	N/A
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.	No change	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.	N/A

No.	SBP Standard 1 v2.0	Revision	SBP Standard 1 v2.1	Rationale for change
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.	No change	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.	N/A
4.1.6	Working hours shall comply with legal requirements.	No change	Working hours shall comply with legal requirements.	N/A
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation.	No change	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation.	N/A
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.	No change	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.	N/A
Feedback 16	I suggest to change to ""for all relevant/related workers""...		<p>SBP: Thank you for your suggestion. The scope of application is already addressed through the definition of "Workers" included in the SBP Glossary, which is defined as the Organisation's and contractors' staff directly involved with the production of the certified products.</p> <p>This definition ensures that training requirements apply only to workers whose roles are relevant to the implementation of the SBP Standards. As such, the existing wording of the indicator is considered appropriate and no change is required.</p>	
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.	No change	Mechanisms shall be in place for resolving grievances and disputes in the workplace.	N/A
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.	No change	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.	N/A

No.	SBP Standard 1 v2.0	Revision	SBP Standard 1 v2.1	Rationale for change
Criterion 4.2 Feedstock sourcing benefits communities.				
4.2.1	Negative social and community impacts shall be identified and avoided.	No change	Negative social and community impacts shall be identified and avoided.	N/A
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.	No change	Feedstock sourcing shall positively contribute to the local economy, including employment.	N/A
Feedback 17	<p>In my opinion the criterion is vague, difficult to audit, and risks becoming a box-ticking or narrative exercise rather than a risk-based sustainability requirement.</p> <p>The suggested wording from my side: ""Feedstock sourcing shall not result in significant negative impacts on the local economy and shall, where relevant, demonstrate reasonable integration with local employment and service provision""</p> <p>This wording is shifting the previous wording focus from positive impact claim to harm prevention (that is more auditable) and adds proportionality for small operators (BP-S).</p>		<p>SBP: Thank you for your comment. The indicator is supported by the SBP Guidance for Standard 1, which outlines potential negative impacts on the local economy and employment. These aspects are addressed through SBP's risk-based approach, ensuring auditability and preventing significant negative impacts. No change is required.</p> <p>SBP Guidance for Standard 1: Impacts (potential / perceived)</p> <ul style="list-style-type: none"> - Lack of local support for forestry - Workers are poorly paid and / or rural employment is reduced - Owners do not get a fair return for their timber - Employees and / or contractors receive inadequate benefits - Reduced strength and vitality of local businesses and communities 	
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.	No change	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
Feedback 18	<p>Here might be two different concepts mixed - HCV-s maintenance and Basic needs of communities. The enhancement indicates that SBP is development or restoration scheme, which it is not. The enhancement is very difficult to assess because it very rarely attributes to biomass sourcing process and is impossible to audit due to lack of pre and after conditions comparison or baseline. I suggest following wording: "Food and water resources that are essential for the fulfilment of the basic needs of local communities shall be maintained.</p>		<p>SBP: Thank you for your comment. SBP recognises the distinction between the maintenance of High Conservation Values (HCV 5 – community needs) and broader socio-economic development or restoration. Enhancement is a concept applied across the SBP Standards to encourage performance beyond maintenance, while remaining linked to biomass sourcing activities. SBP considers the current wording appropriate to the intent of the indicator; however, the comment has been noted and recorded for consideration in a future revision.</p>	
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.	No change	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.	N/A

No.	SBP Standard 1 v2.0	Revision	SBP Standard 1 v2.1	Rationale for change
Feedback 19	<p>I think this criterion may be changed towards the thought that only the rights that actually intersect with sourcing activities are in scope. Rights should be identified using reasonable means (laws, maps, consultations, grievance, etc). My suggested wording would be: "Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities that are relevant to and identifiable within the Supply Base shall be identified and respected."</p> <p>Note: Relevant and identifiable rights are those for which credible evidence exists through applicable law, recognised customary systems, stakeholder input, or other verifiable sources within the defined Supply Base or its sub-scopes.</p>		<p>SBP: Thank you for your comment. The requirement of this indicator, as well as all other indicators, shall be interpreted in relation to biomass feedstock sourcing activities as explicitly stated in Section C of the standard: SBP Standard 1 applies to the Supply Base of the BP. SBP Standard 1 is for use by Organisations defined as BPs seeking certification against the SBP Standard 2, which requires identification, evaluation and adequate mitigation of the risks of non-conformance with SBP Standard 1 when sourcing feedstock from their Supply Base.</p>	
4.2.5	<p>Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.</p>	No change	<p>Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.</p>	N/A
4.2.6	<p>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.</p>	No change	<p>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.</p>	N/A
Feedback 20	<p>In my opinion: The criterion is not applicable. No Indigenous Peoples are present or recognised within the Baltic state Supply Base under internationally accepted definitions (ILO Convention No. 169 / UN frameworks). Consequently, no Indigenous Peoples' rights are identified, and FPIC requirements are not triggered. This criterion may be confused with FSC NFSS process regarding the Indigenous Peoples (e.g. in Estonia), therefore I would suggest amended wording to clarify these aspects.</p> <p>"Where Indigenous Peoples' rights are identified in the Supply Base in accordance with internationally recognised definitions, 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."</p> <p>Accommodation - refers to reasonable measures taken to mitigate impacts on recognised Indigenous Peoples' rights where FPIC has not been achieved.</p>		<p>SBP: Thank you for your comment. The UN and UNDRIP emphasise that Indigenous Peoples should not be defined by others but rather identified based on their own self-identification and recognition by their communities. In line with this principle, we consider the current wording as appropriate.</p>	

No.	SBP Standard 1 v2.0	Revision	SBP Standard 1 v2.1	Rationale for change
4.2.7	Designated cultural heritage sites shall be preserved.	No change	Designated cultural heritage sites shall be preserved.	N/A

General Comments

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

Comment 21

I believe that, to ensure legal and sustainable feedstock, is necessary to ensure Sustainable Forest Management (SFM). It's necessary to follow (and usually to support), the responsible for the land/forest to verify and confirm all the decisions and management activities related to the forest area in a long-term perspective, along the forest rotation. It goes further beyond the momentum of the harvesting of the feedstock, and that's why I don't believe is possible to a "biomass producer" to ensure that the biomass is produced from legal and sustainable feedstock sources, as proposed in SBP initiative. Great amount of the feedstock is supplied from operators that buy the material on forest area (as standing trees) and normally have no influence on the manager/land owner decisions, nor in what will or will not be made on the area after the harvesting, nor how those activities will or will not be made (replanting, maintenance, pest control, etc.).

SBP: Thank you for sharing your comments and views. The SBP system ensure the sourcing of feedstock is sustainable and legal. SBP Standards 2 includes a number of requirements applied by many Organisations globally to adequately identify and mitigate Specified Risk of sourcing feedstock that is not in compliance with the requirements of Standard 1.

Comment 22

It's important to consider that "Legally harvested" does not mean "sustainably produced" or "sustainably managed"; legal requirements are sometimes insufficient to guarantee SFM, or are inadequately enforced. It is also important to consider that forest produces wood and biomass for different uses, and certification should have this perspective, and not be limited to a single type of use, as for energy production, for example. So, instead to create this certification option, I believe SBP should recognize FSC (and PEFC) Forest Management certification as the only way to "ensure" sustainable wood feedstock sources. For this purpose, SBP should work together with FSC (and PEFC) and align and simplify the FSC Principles and Criteria (and PEFC standards). (I need to say that FSC and PEFC should be also only one initiative...) in order to have a viable way to promote and ensure responsible wood feedstock sources in a long-term perspective for all forest products and services.

SBP: Thank you for sharing your comments and views. SBP has benchmarked and recognised the Forest Management Systems developed and maintained by FSC and PEFC. SBP is also aware that the update of these systems might be limited in specific geographies and producers set-ups. Whilst recognising the positive impact of these systems, SBP has developed a robust approach enabling producers to sustainably and legally source feedstock for the production of biomass. In line with SBP strategy and vision, SBP's system can be applied to Organisations in the bioeconomy beyond the energy sector.

Comment 23

Regarding indicator 2.2.1: Please consider including a description of conversions which are SBP-acceptable. Conversions to consider could be conversion of forest for infrastructures project like roads, windmills, transport logistical centers, residential areas. Also please consider if conversion shall be accompanied by compensation forest e.g. 2-4 times the converted area + ecosystem/biodiversity consideration

SBP: Thank you for sharing your comments and views. The topic is relevant and has been recorded for further analysis and will be considered for future revision.