



Standards Document

SBP Standard 2: Feedstock Verification

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 designed for biomass, mostly in the form of wood pellets and chips.

The SBP certification scheme provides assurance to stakeholders that biomass is sourced both legally and sustainably, and it provides a means to collect and communicate reliable and verified data throughout the supply chain, including energy data, allowing companies in the biomass sector to demonstrate their responsible sourcing achievement and compliance with regulatory requirements and to calculate their Greenhouse Gas (GHG) footprint.

There are six SBP Standards, which collectively represent the SBP certification scheme, against which Organisations can be assessed for certification by independent third-party accredited Certification Bodies (CBs). The Standards were developed and revised following a rigorous process aligned with ISEAL Standard-Setting Code of Good Practice, considering and building on existing regulatory requirements, peer voluntary certification standards and stakeholders' input.

An Organisation that satisfactorily demonstrates conformance with applicable SBP Standards receives a certificate and may be entitled to make use of the SBP Data Transfer System (DTS) and SBP claims in relation to the biomass it produces, sells, buys and/or uses.

B Purpose

The SBP certification scheme provides assurance to End-users that the biomass is sourced from legal and sustainable feedstock, as defined in SBP Standard 1. SBP certification relies on a third-party, independent certification process carried out by accredited CBs.

SBP Standard 2 sets out the requirements for Biomass Producers (BPs) to identify, evaluate and mitigate the risks of sourcing feedstock, for the purposes of biomass production, that does not conform with the criteria set in SBP Standard 1. Risks are rated as 'low' or 'specified'. Organisations need to ensure that all specified risks are managed and thus reduced to a low level, or otherwise exclude the feedstock associated with specified risks from SBP supply chains.

The SBP Standards are not meant to replace forest management certification schemes. Rather, the SBP Standards aim to support BPs in identifying sustainability risks when designing their sourcing policies and actions to mitigate specified risks. The SBP Risk Management System acknowledges the synergies with recognised existing forest management certification schemes to adequately manage risks in the Supply Base. Such that Risk Management is adapted for feedstock that is certified by SBP-recognised and SBP-benchmarked schemes.

The SBP certification scheme follows a risk-based approach. BPs assess the risk of non-conformance against the principles and criteria of SBP Standard 1, when deciding which feedstock to source for biomass production. Using SBP Standard 2, BPs will identify, evaluate and adequately mitigate the risks of sourcing feedstock, for the purposes of biomass production, that does not comply with the criteria set in SBP Standard 1.

Risks are rated as 'low' or 'specified'. Organisations need to ensure that all specified risks are managed and thus reduced to a 'low' level or otherwise exclude the feedstock associated with specified risks from SBP supply chains.

Organisations gain certification against SBP Standard 2 by conforming with the requirements set in SBP Standard 1 and demonstrating that any specified risks of sourcing feedstock not in conformance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements.

Once granted a certificate, an Organisation is entitled to use the SBP-compliant and/or SBP-controlled claims, provided the SBP-certified management system is implemented during production. Organisations must use the DTS to pass those claims down the supply chain, in conformance with the requirements set in SBP Standard 4. The Organisation will also collect the data required by SBP Standards 5 and 6 and use the DTS to communicate all data to their customers.

C Scope

SBP Standard 2 is for use by Organisations defined as BPs and is aimed at sourcing feedstock from a defined Supply Base and selling biomass with a SBP claim. The Organisation shall also be certified against SBP Standard 4, SBP Standard 5 and the Instruction Document EU RED.

D How to use this document

SBP Standard 2 sets out the requirements for Organisations to define their Supply Base, identify and rate the risks that feedstock sourced from the supply base is not in conformance with the requirements set in SBP Standard 1 and define and implement mitigation measures to effectively reduce specified risks to a 'low' level. SBP Standard 2 also includes requirements for Organisations to consult stakeholders and report on their findings.

The following terms are used by SBP in its normative documents to indicate requirements, recommendations, permissions, and possibilities or capabilities:

“shall” indicates a requirement,

“should” indicates a recommendation,

“may” indicates a permission, and

“can” indicates a possibility or a capability.

SBP Standard 2 may be accompanied by guidance published from time-to-time by SBP to support the implementation of the requirements.

The Organisation shall also refer to the SBP Instruction Documents and/or Normative Interpretations related to SBP Standard 2 as published by SBP.

The CB will evaluate conformance of the Organisation against SBP Standard 2 using the general certification rules set in SBP Standard 3.

E Normative references

SBP Standard 1: Feedstock Compliance

SBP Standard 3: Requirements for Certification Bodies

SBP Standard 4: Chain of Custody

SBP Standard 5: Collection and Communication of Data

SBP Standard 6: Energy and Carbon Balance Calculation

F Glossary of terms and definitions

Please refer to the separate SBP Glossary of Terms and Definitions document.

G Summary of changes

SBP Standard 2 v2.0	SBP Standard 2 v2.1	Comments
<p>Scope</p> <p>SBP Standard 2 is for use by Organisations defined as BPs and is aimed at sourcing feedstock from a defined Supply Base and selling biomass with a SBP claim.</p> <p>The Organisation shall also be certified against SBP Standards 4 and 5.</p>	<p>Scope</p> <p>SBP Standard 2 is for use by Organisations defined as BPs and is aimed at sourcing feedstock from a defined Supply Base and selling biomass with a SBP claim.</p> <p>The Organisation shall also be certified against SBP Standard 4, SBP Standard 5 and the Instruction Document EU RED.</p>	<p>Instruction Document EU RED has been added.</p>
<p>1.1.2 The Organisation shall include which feedstock category is being sourced.</p>	<p>1.1.2 The Organisation shall include which feedstock category is being sourced and its certification status, if relevant.</p>	<p>Amended to capture the certified feedstock input received with different claims.</p> <p>The phrase “if relevant” was included to recognise that, in situations where the certification status (FSC, PEFC, SFI) is used as a mitigation measure for specified risk, the status shall be recorded.</p>

SBP Standard 2 v2.0	SBP Standard 2 v2.1	Comments
<p>1.1.3 The Organisation shall include a description of all operators involved in the production, harvesting and transport of feedstock and having an impact on conformance with SBP standards, including at least the following:</p> <ul style="list-style-type: none"> – company names, – addresses of operating sites, – key contact person, – status of certification against SBP-recognised scheme (where relevant), and – stages within the feedstock supply chain from the sourcing area up to and including the Organisation’s own operations. 	<p>1.1.3 The Organisation shall include a description of all suppliers involved in the production, harvesting and transport of feedstock and having an impact on conformance with SBP standards, including at least the following:</p> <ul style="list-style-type: none"> – company names and addresses, – key contact person, – status of certification against the SBP-recognised scheme (certificate number and validity) for feedstock suppliers, and – stages within the feedstock supply chain from the sourcing area up to and including the Organisation’s own operations. 	<p>The indicator requirement has changed from “operator” to “supplier.”</p> <p>Amended to ensure the validity of the supplier certificate for feedstock received with different claims.</p>
<p>1.1.5 If any sub-scopes are defined these shall be described, mapped, and justified.</p>	<p>1.1.5 If any sub-scopes are defined by the RRA or CRA, these shall be described, justified, and if possible mapped.</p>	<p>The intention is to clarify the conditions under which the sub-scope is defined.</p>
<p>1.1.9 The Organisation shall record the relative portions and volumes of its feedstock, as coming from:</p> <ol style="list-style-type: none"> a. Regional Risk Assessment (RRA) with all low risks, b. RRA with some specified risks, c. Biomass Producer’s Supply Base Evaluation (SBE), and d. Certified sources against an SBP-recognised certification scheme as published by SBP. 	<p>1.1.9 The Organisation shall record the relative portions and volumes of its feedstock, as coming from:</p> <ol style="list-style-type: none"> a. Regional Risk Assessment (RRA), b. Biomass Producer’s Company Risk Assessment (CRA), and c. Certified sources against an SBP-recognised certification scheme as published by SBP. 	<p>The intention is to track volumes and introduce the three avenues for managing the risk (CRA, RRA, Certified).</p>

SBP Standard 2 v2.0	SBP Standard 2 v2.1	Comments
<p>2.1 The Organisation shall ensure that all sourced feedstock can be traced back to the defined Supply Base. To do so, the Organisation shall ensure that the sourcing area is within the defined Supply Base.</p>	<p>2.1 The Organisation shall ensure that all sourced feedstocks can be traced back to the defined Supply Base. To do so, the Organisation shall ensure that the sourcing areas are within the defined Supply Base.</p>	<p>Sourcing area changed from singular to plural.</p>
<p>2.2 The Organisation shall have access to records describing the sourcing area of all feedstock, and whether feedstock sourced is certified against an SBP-recognised scheme or the area is covered by a valid SBP-endorsed RRA, if relevant.</p>	<p>2.2 The Organisation shall have access to records describing the sourcing area of primary feedstock and processing residues.</p>	<p>Clarification regarding traceability back to the sourcing area: required only for feedstock covered by CRA or RRA (access to records is not needed for post-consumer feedstock).</p>
<p>3.2 The Organisation shall identify the applicable requirements of this Standard using the following table [...].</p>	<p>3.2 The Organisation shall identify the applicable requirements of this Standard using the following table [...].</p>	<p>To clarify the requirements and use of terms. SBE has been replaced by the CRA. The SBP-recognised certification scheme is applied to eligible input claims, while the SBP-benchmarked certification scheme is used for risk mitigation purposes.</p>

SBP Standard 2 v2.0	SBP Standard 2 v2.1	Comments
<p>3.6.2 If these changes affect the Risk Assessment conclusions, the Organisation shall alter the required RMP of an SBE, which shall result in an immediate review and, if deemed necessary, revision of the SBE by the Organisation.</p> <p>Such changes may include, but are not limited to:</p> <ul style="list-style-type: none"> – new legislation and/or jurisdictional changes, – new feedstock sources being proposed, – new suppliers and/or contractors being used, – identification of new sustainability issues relevant to the SBP Standard, and – failure of any RMM within the RMP to address the specified risks. 	<p>3.6.2 If these changes affect the Risk Assessment conclusions, the Organisation shall alter the required RMP of an SBE, which shall result in an immediate review and, if deemed necessary, revision of the SBE by the Organisation. Such changes may include, but are not limited to:</p> <ul style="list-style-type: none"> – new legislation and/or jurisdictional changes, – new feedstock sources being proposed, – new suppliers and/or contractors being used, – identification of new sustainability issues relevant to the SBP Standard, – failure of any RMM within the RMP to address the specified risks, and – changes to published RRAs (including changes from an SBP-interim to an SBP-endorsed RRA) within six months of the change. 	<p>Inclusion of the interim and endorsed RRAs.</p>

SBP Standard 2 v2.0	SBP Standard 2 v2.1	Comments
New	<p>3.12 Regardless of the risk rating assigned in a published Regional Risk Assessment or Company Risk Assessment (e.g., forest conversion occurring under an indicator rated as low risk), if a Biomass Producer identifies that feedstock is received from sources that do not meet the SBP Standard 1 requirements, the feedstock shall not be considered compliant.</p> <p>The Organisation shall evaluate whether the RRA, CRA, RMM and/or RMP require updating and shall keep a record of this evaluation. In such cases:</p> <ul style="list-style-type: none"> a) The Organisation shall inform its Certification Body of any such cases, b) The Certification Body shall report the discrepancy to SBP to inform a potential review of the RRA risk rating, and c) If a Company Risk Assessment (CRA) has been developed by the Biomass Producer, the Certification Body shall evaluate whether the CRA risk conclusion must be revised. 	<p>From the already published Normative Interpretation. It clarifies that feedstock cannot be considered SBP-compliant if there is evidence of non-conformance with SBP Standard 1 requirements, even if the risk assessment indicates low risk. It also includes a list of actions for CH and CB to document and act on.</p>
<p>5.3.4 The Organisation shall determine SBVs to evaluate whether operators within the Supply Base are implementing best practices that demonstrably meet the Indicators of SBP Standard 1.</p>	<p>5.3.4 If the organisation cannot determine whether applicable laws are enforced and implemented, the Organisation shall determine SBVs to evaluate whether operators within the Supply Base are implementing best practices that demonstrably meet the Indicators of SBP Standard 1.</p>	<p>The intention is to align with the REF (Risk Evaluation Framework) and to cover all four evaluation steps.</p>
New	<p>5.3.5 The Organisation shall determine SBVs to evaluate the current conditions.</p>	<p>The requirement was missing and has been added to align with the REF.</p>

SBP Standard 2 v2.0	SBP Standard 2 v2.1	Comments
New	5.4 If a Biomass Producer exclusively sources primary feedstock certified against an SBP-benchmarked certification scheme, then it shall only be required to develop SBVs and conduct a Risk Assessment for those indicators that are marked as partially met or not met in a corresponding SBP-benchmarked scheme.	From the already published Normative Interpretation. It clarifies the development of the Risk Assessment when sourcing certified feedstock.
6.1 The Organisation shall conduct a Risk Assessment to determine if there is a risk that the feedstock sourced is not in conformance with SBP Standard 1 requirements, using identified SBVs.	6.1 The Organisation shall conduct a Company Risk Assessment when RRA is not available, to determine if there is a risk that the feedstock sourced is not in conformance with SBP Standard 1 requirements, using identified SBVs.	Introducing CRA and clarification when it is needed.
6.2 The Organisation shall include all operators involved in the production, harvesting and transport of feedstock within its Supply Base, and having an impact on conformance with SBP standards, in its Risk Assessment.	6.2 The Organisation shall include in its Company Risk Assessment all activities within its Supply Base which have an impact on the conformance with the requirements of the SBP Standard 1.	Clarification regarding activities that need to be covered by the risk assessments.
7.1 The Organisation shall develop a Risk Management Plan (RMP) which includes Risk Management Measures (RMMs) for each Indicator rated as specified risk within its SBE per the Organisation's Risk Assessment or an SBP-endorsed RRA with the objective to mitigate the risk and reduce the risk rating to low risk.	7.1 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.	Removing "endorsed" for clarity.
7.2 The Organisation shall implement any RMMs proposed by SBP (i.e., in Instruction Documents) or by SBP-endorsed RRAs.	7.2 The Organisation shall implement any RMMs marked as mandatory in SBP RRAs or other normative documents.	Clarification regarding the compulsory mitigation measures.

SBP Standard 2 v2.0	SBP Standard 2 v2.1	Comments
New	7.4 The Organisation shall implement the RMP and establish a process to evaluate Operators' compliance with this.	Enforce the requirement to implement the RMP at the forest level, where applicable.
<p>8.1 Before finalising its SBE or when the Organisation updates its SBE, the Organisation shall engage with its stakeholders, with the specific intention of seeking feedback on its SBE, including its:</p> <ul style="list-style-type: none"> a. Supply Base Verifiers, b. Risk Assessment and risk ratings, and c. the Risk Management Plan, Risk Management Measures and Means of Verification. 	<p>8.1 Before finalising its SBE or when the Organisation updates its SBE, the Organisation shall engage with its stakeholders, including conducting a stakeholder consultation with the specific intention of seeking feedback on its SBE, including its:</p> <ul style="list-style-type: none"> a. Supply Base Verifiers if CRA is used, b. Risk Assessment and risk ratings if CRA is used, and c. the Risk Management Plan, Risk Management Measures and Means of Verification for CRA or RRA. 	Clarification on conditions regarding SBE elements that require stakeholder engagement.

1 Supply Base Definition and Mapping

- 1.1** The Organisation shall define the boundaries of its sourcing areas and map its Supply Base, in accordance with the following:
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- 1.1.1** The Organisation shall include the sourcing areas for all feedstock (including geographical boundaries) that are currently used and intended to be used in the production of SBP-certified biomass.
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- 1.1.2** The Organisation shall include which feedstock category is being sourced and its certification status, if relevant.
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- 1.1.3** The Organisation shall include a description of all suppliers involved in the production, harvesting and transport of feedstock and having an impact on conformance with SBP standards, including at least the following:
- company names and addresses,
 - key contact person,
 - status of certification against the SBP-recognised scheme (certificate number and validity) for feedstock suppliers, and
 - stages within the feedstock supply chain from the sourcing area up to and including the Organisation’s own operations.
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- 1.1.4** The Organisation shall ensure the boundaries and the map of the Supply Base remain up-to-date.
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- 1.1.5** If any sub-scopes are defined by the RRA or CRA, these shall be described, justified, and if possible mapped.
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- 1.1.6** The Organisation shall keep records of feedstock inputs as required in SBP Standard 4.
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- 1.1.7** The records of feedstock category inputs shall show the relative volumes of different feedstock inputs used.
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- 1.1.8** The records of feedstock inputs shall include identification of volumes of Primary feedstock, Processing residues and post-consumer feedstock used, and a description of the inputs, including species for the primary feedstock and, if known, for processing residues feedstock.
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- 1.1.9** The Organisation shall record the relative portions and volumes of its feedstock, as coming from:
- a. Regional Risk Assessment (RRA)
 - b. Biomass Producer’s Company Risk Assessment (CRA),
 - c. Certified sources against an SBP-recognised certification scheme as published by SBP.

2 Traceability to the Supply Base

- 2.1 The Organisation shall ensure that all sourced feedstocks can be traced back to the defined Supply Base. To do so, the Organisation shall ensure that the sourcing areas are within the defined Supply Base.
- 2.2 The Organisation shall have access to records describing the sourcing area of primary feedstock and processing residues.
- 2.3 When an Organisation is sourcing post-consumer feedstock it shall implement and comply with the requirements defined in Annex 1: SBP processing residues and post-consumer feedstock requirements.

3 Supply Base Evaluation (SBE)

- 3.1 The Organisation shall develop, implement, and maintain an SBE unless exempted per the table in 3.2 below.

Options for the applicability of the standard

- 3.2 The Organisation shall identify the applicable requirements of this Standard using the following table:

Feedstock category	+ certification status	= SBP Standard 2 conformance requirements (with options where applicable)
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For SBP-compliant claims

Primary	Not certified to an SBP-benchmarked certification scheme	CRA + Risk Management for specified risks OR RRA + Risk Management for specified risks
	Certified to an: SBP-recognised certification scheme OR SBP-recognised controlled claim	CRA + Risk Management for specified risks* OR RRA + Risk Management for specified risks* *The Organisation may consider requirements of the SBP-benchmarked certification scheme as a potential RMM

Processing residues	Not certified to an SBP-recognised certification scheme	Evidence to prove the 'processing residues' feedstock category, AND CRA + Risk Management for specified risks OR RRA + Risk Management for specified risks
	Certified to an SBP-recognised certification scheme	Evidence to prove the 'processing residues' feedstock category, and that the feedstock is certified by an SBP-recognised certification scheme
Post-consumer	n/a	Evidence to prove 'post-consumer' feedstock category (No CRA, RRA or other certification required)
For SBP-controlled claims		
Primary	SBP-recognised certification/controlled claim	Evidence that the feedstock is certified by an SBP-recognised certification/controlled scheme
	Controlled material from SBP-recognised controlled scheme	Evidence that the DDS is certified by an SBP-recognised controlled scheme, and the last annual surveillance audit of the SBP-recognised controlled scheme has not been waived
Processing residues	SBP-recognised certification/controlled claim	Evidence to prove 'Processing residues' feedstock category AND/OR evidence that the feedstock is certified by an SBP-recognised certification/controlled scheme
	Controlled material from SBP-recognised controlled scheme	Evidence that the DDS is certified by an SBP-recognised controlled scheme, and the last annual surveillance audit of the SBP-recognised controlled scheme has not been waived

- 3.3** Depending on the source of feedstock, the Organisation shall develop and implement: all, parts or none, of the elements of an SBE in accordance with the following:
- a. Supply Base Verifiers (SBVs) (see section 5 below) and/or
 - b. Risk Assessment and Risk Ratings (see section 6 below) and/or
 - c. Risk Management Plan (RMP) containing Risk Management Measures (RMM) (see section 7 below).

General provisions

3.4 The Organisation shall identify any Indicator within Standard 1 that may conflict with applicable legislation (national and sub-national) in the Supply Base, and evaluate any effects on certification, in discussion with the affected parties. If the Standards and applicable legislation conflict, the Organisation shall seek ways to honour the Principles of the Standard wherever possible. Where the domestic context renders it impossible to meet this responsibility fully, Organisations shall respect the Principles of the Standard to the greatest extent possible in the circumstances and shall demonstrate their efforts in this regard without contravening laws, regulations or court decisions.

Note: Conflicts are considered to exist where a legal obligation prevents the implementation of some aspect of the Standard. A conflict is not considered to exist if the requirements of the Standard exceed the minimum requirements for legal compliance.

3.5 The Organisation shall establish sub-scopes where the risks of non-compliance with Standard 1 are not homogeneous within the Supply Base. The sub-scopes shall be defined as geographical areas or otherwise clearly delineated separate sources of feedstock within the Supply Base, where the risks are uniform.

3.6 The Organisation shall establish a process to ensure that the SBE is kept up to date.

3.6.1 The Organisation shall keep record of any changes in the Supply Base or supply chain and how these changes may affect the Risk Assessment conclusions.

3.6.2 If these changes affect the Risk Assessment conclusions, the Organisation shall alter the required RMP of an SBE, which shall result in an immediate review and, if deemed necessary, revision of the SBE by the Organisation. Such changes may include, but are not limited to:

- new legislation and/or jurisdictional changes,
- new feedstock sources being proposed,
- new suppliers and/or contractors being used,
- identification of new sustainability issues relevant to the SBP Standard,
- failure of any RMM within the RMP to address the specified risk, and
- changes to published RRAs (including changes from an SBP-interim to an SBP-endorsed RRA) within six months of the change.

3.6.3 The Organisation shall review and revise its SBE at least every five (5) years.

Competence to undertake Supply Base Evaluations

3.7 The Organisation shall establish a process for selecting and appointing an entity or individual(s) with the required competences, per 3.8, to undertake the SBE.

- 3.8** The Organisation shall ensure that the entity or individual(s) undertaking the SBE has/have and can demonstrate the necessary competence, knowledge, and experience to evaluate the Organisation's Supply Base and associated supply chains against SBP Standard 1, including but not limited to the following:
- ecological and social values,
 - applicable laws and regulations,
 - business management practices,
 - the operation of suppliers and contractors, including management systems and products,
 - SBP requirements,
 - Due Diligence Systems (DDS),
 - appropriate language(s) for all stakeholders,
 - note-taking and report-writing, and
 - stakeholder engagement.

Conclusions of the Supply Base Evaluation

- 3.9** The Organisation shall evaluate the risk, considering the probability and the consequences of non-conformance, for each Indicator of Standard 1.
- 3.10** The Organisation shall assign a single risk rating for each Indicator (and per sub-scope if applicable), as follows.
- a. Low risk: An Indicator shall only be categorised as low risk if there is evidence of negligible risk of non-conformance, considering the probability and consequences.
 - b. Specified risk: All Indicators that cannot be categorised as low risk shall be considered specified risk.
- 3.11** The Organisation shall consider feedstock as SBP-compliant if:
- a. the results of the Risk Assessment(s) conclude low risk for all Indicators, or
 - b. the results of the Risk Assessment(s) conclude specified risk however the RMMs have effectively reduced all specified risks to low risk, or
 - c. the Organisation can provide evidence that the feedstock can be categorised as processing residues and that the feedstock is certified against an SBP-recognised certification scheme, or
 - d. the Organisation can provide evidence that the feedstock can be categorised as post-consumer.

- 3.12** Regardless of the risk rating assigned in a published Regional Risk Assessment or Company Risk Assessment (e.g., forest conversion occurring under an indicator rated as low risk), if a Biomass Producer identifies that feedstock is received from sources that do not meet the SBP Standard 1 requirements, the feedstock shall not be considered compliant.
- The Organisation shall evaluate whether the RRA, CRA, RMM and/or RMP require updating and shall keep a record of this evaluation. In such cases:
- a) The Organisation shall inform its Certification Body of any such cases.
 - b) The Certification Body shall report the discrepancy to SBP to inform a potential review of the RRA risk rating.
 - c) If a Company Risk Assessment (CRA) has been developed by the Biomass Producer, the Certification Body shall evaluate whether the CRA risk conclusion must be revised.

4 Supply Base Reporting

- 4.1** The Organisation shall prepare a Supply Base Report (SBR) using the SBP Audit Portal.
- 4.2** The Organisation shall update its SBR at least annually.
- 4.3** The Organisation shall make the SBR, including Annex 1 if applicable, available on request to stakeholders.

5 Supply Base Verifiers (SBVs)

- 5.1** SBVs shall not remove or weaken the indicators set out in SBP Standard 1.
- 5.2** SBVs shall not alter the intent of the indicators.
- 5.3** For each Indicator in SBP Standard 1, the Organisation shall identify and maintain a list of SBVs in accordance with the following:
- 5.3.1** The Organisation shall identify all applicable laws within the Supply Base that meet the Indicators of SBP Standard 1.
 - 5.3.2** The Organisation shall determine SBVs to evaluate whether these laws are enforced.
 - 5.3.3** The Organisation shall determine SBVs to evaluate whether the laws are implemented by the operators within the Supply Base.
 - 5.3.4** The Organisation cannot determine whether applicable laws are enforced and implemented, the Organisation shall determine SBVs to evaluate whether operators within the Supply Base are implementing best practices that demonstrably meet the Indicators of SBP Standard 1.
 - 5.3.5** The Organisation shall determine SBVs to evaluate the current conditions.

5.4 If a Biomass Producer exclusively sources primary feedstock certified against an SBP-benchmarked certification scheme, then it shall only be required to develop SBVs and conduct a Risk Assessment for those indicators that are marked as partially met or not met in a corresponding SBP-benchmarked scheme.

6 Risk Assessment

6.1 The Organisation shall conduct a Company Risk Assessment when RRA is not available, to determine if there is a risk that the feedstock sourced is not in conformance with SBP Standard 1 requirements, using identified SBVs.

6.2 The Organisation shall include in its Company Risk Assessment all activities within its Supply Base which have an impact on the conformance with the requirements of the SBP Standard 1.

6.3 The Organisation may only conclude low risk according to the following:

- a. if legislation which addresses the requirement(s) in SBP Standard 1 exists and is enforced, and operators are demonstrating legal compliance within the Supply Base; or
- b. in the absence of existing applicable legislation or lack of legal enforcement, by assessing whether relevant operators are implementing best practice which demonstrates conformance with the requirements of SBP Standard 1.

6.4 The Organisation shall justify the risk rating using the identified SBVs. The Organisation shall include this information in its SBR.

6.5 The Risk Assessment shall be signed off by senior management in the Organisation.

7 Risk Management

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.

7.3 Where there are no RMMs proposed by SBP, the Organisation shall develop its own, based on available best practice, knowledge of its specific suppliers and risk factors, and other relevant factors.

7.4 The Organisation shall implement the RMP and establish a process to evaluate Operators' compliance with this.

7.5	The Organisation shall ensure that the RMP identifies: <ol style="list-style-type: none"> to whom in the Supply Base the RMMs applies, to address all specified risks; the timeframe by when the RMMs shall be implemented; and the Means of Verification of the effectiveness of the RMMs to reduce the risk rating to low risk.
7.6	RMMs shall be justified and documented, with records of implementation maintained.
7.7	The RMP shall be signed off by senior management in the Organisation.
7.8	The Organisation shall monitor the effectiveness of its RMMs at least every 12 months but in any case, prior to its annual audit.
7.9	Where RMMs are found to have not been effective in mitigating risk, the Organisation shall consider the feedstock not SBP-compliant, until the Organisation implements further mitigation measures and verifies their effectiveness (i.e., reducing the risk rating to low) for the feedstock to be considered SBP-compliant.
7.10	The Organisation shall stop considering as SBP-compliant feedstock sourced from suppliers who, following request, fail to demonstrate that they are implementing RMMs.

8 Stakeholder Engagement

8.1	Before finalising its SBE or when the Organisation updates its SBE, the Organisation shall engage with its stakeholders, including conducting a stakeholder consultation with the specific intention of seeking feedback on its SBE, including its: <ol style="list-style-type: none"> Supply Base Verifiers if CRA is used, Risk Assessment and risk ratings, if CRA is used, and the Risk Management Plan, Risk Management Measures and Means of Verification for CRA or RRA.
8.2	The Organisation shall engage with its stakeholders each time the SBE is revised.
8.3	The Organisation shall seek to address relevant stakeholder concerns; it is not required to achieve a consensus with stakeholders.
8.4	The Organisation shall allow stakeholders at least one month to provide feedback before the SBE is finalised.
8.5	The Organisation shall provide stakeholders with adequate information as a basis for informed comment but does not have to provide confidential information.

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- 8.6** The Organisation shall maintain the following records:
- a. lists of individuals/organisations invited to comment;
 - b. copies of all correspondence and/or comments received with respect to the SBE and its components; and
 - c. justification for any information withheld on the grounds of confidentiality.

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- 8.7** The Organisation shall provide to those stakeholders who engaged in the process feedback on their comments and the revised SBR.

Annex 1: **SBP processing residues and post-consumer feedstock requirements**

Adapted from Reference Source: FSC-STD-40-007 (V2-0) EN: Sourcing Reclaimed Material For Use In FSC Product Groups Or FSC-Certified Projects

1. **Verification and monitoring of suppliers**

- 1.1** The Organisation shall conduct a verification process for its suppliers of processing residues and post-consumer feedstock to determine whether this feedstock is eligible for the SBE exemptions mentioned in 3.2 above.
- 1.2** Verification shall include the following elements:
- a. For each supplier, the Organisation shall define the necessary evidence, actions and record keeping procedures to show that feedstock received conforms with the SBP definitions of processing residues and/or post-consumer feedstock. These records shall specify:
 - i. Name and address of the supplier;
 - ii. Type of supplier (i.e., producer, purchaser/collector from point of reclamation, Trader);
 - iii. Categories of feedstock supplied (i.e., processing residues, post-consumer);
 - iv. Level of control required (i.e., visual inspection upon receipt, supplier audits – see Annex 1, sections 2 and 3 below); and
 - v. Self-declaration that the feedstock qualifies as processing residues or post-consumer feedstock according to SBP.
 - b. The Organisation shall monitor the conformance of its suppliers with SBP definitions and purchase specifications and shall have a contingency plan to cater for non-compliant feedstock or documentation. For example, the Organisation might classify feedstock as non-eligible input for SBP products, request correction of purchase documents, or invalidate suppliers temporarily or permanently.

2. **Feedstock inspection and categorisation upon receipt**

- 2.1** Upon receipt, the Organisation shall visually inspect all processing residues and/or post-consumer feedstock and shall confirm their categorisation as 'processing residues' or 'post-consumer' feedstock.
- 2.2** For all processing residues and post-consumer feedstock received, the Organisation shall retain documentary evidence of the delivery and inspections carried out that confirmed that the feedstock complies with SBP definitions.
- 2.3** In cases where adequate evidence for the categorisation of the feedstock as 'processing residues' or 'post-consumer' feedstock is not available at the point of receipt, the Organisation shall include the supplier in the supplier audit and conformance with the relevant SBP requirements shall be confirmed prior to the feedstock being used.

- 2.4** In cases where feedstock received does not comply with purchase specifications and/or the quantities stated on the invoices are incorrect, the Organisation shall take immediate corrective actions. These actions shall be recorded and communicated to the Certification Body during the annual audit.

3. Supplier audit for processing residues and post-consumer feedstock

Note: Section 3 is only required if feedstock categorisation could not be demonstrated through Section 2 above.

- 3.1** The Organisation shall perform annual or more frequent on-site audit of the suppliers as part of the supplier audit for processing residues and post-consumer feedstock (including overseas suppliers) based on a justified sampling approach.
- 3.2** Traders or sales offices that do not take physical possession of processing residues or post-consumer feedstock, and which do not alter, store or re-package the feedstock may be verified remotely through desk audits.
- 3.3** The legal owner may contract another external, suitably qualified party to operate the supplier audit.
- 3.4** In cases where the supplier selected for sampling sells processing residues or post-consumer feedstock that were previously collected, classified and traded by other companies or sites, the complete supply chain of these feedstock shall be audited back to the point where the categorisation as processing residues or post-consumer feedstock can be demonstrated through objective evidence.
- 3.5** The Organisation shall evaluate and verify documents and other evidence regarding the quantity, quality and conformance with SBP definitions of processing residues and post-consumer feedstock, including:
- a. Supplier's instructions or procedures put in place to control and classify the processing residues and/or post-consumer feedstock.
 - b. When applicable, training or instructions provided to the supplier's personnel in relation to categorisation and control of processing residues and/or post-consumer feedstock.
 - c. Registers establishing feedstock origin (e.g., photographs, addresses of demolished buildings, invoices).
- 3.6** The Organisation shall consider a declaration from the supplier, even if part of the contractual agreement, as not sufficient proof of origin and feedstock category.
- 3.7** The Organisation shall document supplier audits, including a record of audit date, findings, names and qualifications of auditors and examples of evidence concerning categorisation of feedstock.