



Supporting Document

Stakeholder comments SBP Standard 2: Feedstock Verification

April 2026

Sustainable Biomass Program

sbp-cert.org



No.	SBP Standard 2 v2.0	Revision	SBP Standard 2 v2.1	Rationale for change
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:	No change	The Organisation shall define the boundaries of its sourcing areas and map its Supply Base, in accordance with the following:	N/A
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.	No change	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.	N/A
1.1.2	The Organisation shall include which feedstock category is being sourced	Revised	The Organisation shall include which feedstock category is being sourced and its certification status, if relevant.	Amended to capture the certified feedstock input received with different claims. 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.
Feedback 1	Guidance is needed on how to deal with company's internal DDS systems (PEFC DDS, FSC Controlled Wood) that are used to accept SBP Controlled material. As it is an internal system of individual company's, there will be no certification proof on individual deliveries. It is also not part of the SBP certification and audit, as it is out of scope of SBP audits. Moreover, the auditors might not even know the requirements as they do not audit FSC CW or PEFC DDS. There is no guidance on how to deal with these internal control systems while that are essential for credibility of these supplies.		SBP: Thank you for your comment. SBP has updated the conformance requirements under indicator 3.2 to clarify that controlled material must be supported by a verified and audited due diligence system under an SBP-recognised controlled scheme. This ensures credibility and auditability of internal DDS systems used for controlled material. Please see Section 3.2: <i>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.</i>	

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Feedback 2	Could all relevant and defensible certification schemes be included? ie American Tree Farm System or simply just say PEFC. I agree with requiring the accounting for these claims when used as mitigation measures as it increases the promotion and uptake of these certification programs.		SBP: Thank you for your comment. Section B Purpose mentions that 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.	
1.1.3	<p>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. 	Revised	<p>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>
Feedback 3	We are in favour of the new definition of a supplier being a legal entity from which an Organisation purchases feedstock or biomass, and endorses this definition is applicable to directly contracted suppliers that are engaged with the Certificate Holder only.		SBP Thank you for your positive feedback regarding the "supplier" definition.	
1.1.4	The Organisation shall ensure the boundaries and the map of the Supply Base remain up-to-date.	No change	The Organisation shall ensure the boundaries and the map of the Supply Base remain up-to-date.	N/A
1.1.5	If any sub-scopes are defined these shall be described, mapped, and justified.	Revised	If any sub-scopes are defined by the RRA or CRA, these shall be described, justified, and if possible mapped.	The intention is to clarify in which conditions sub-scope are defined.

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Feedback 4	In some instances it is not possible to map the subscopes of the RRAs as these may depend on definitions that are not geographically defined. An example is private land in British Columbia, Canada, where the subscope for privately managed forest and other private land is differentiated by tax status		SBP: Thank you for your comment. SBP recognises that some sub-scopes cannot be geographically mapped. The wording has been revised accordingly, while Supply Base mapping remains required under indicator 1.1.4.	
1.1.6	The Organisation shall keep records of feedstock inputs as required in SBP Standard 4.	No change	The Organisation shall keep records of feedstock inputs as required in SBP Standard 4.	N/A
1.1.7	The records of feedstock category inputs shall show the relative volumes of different feedstock inputs used.	No change	The records of feedstock category inputs shall show the relative volumes of different feedstock inputs used.	N/A
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.	No change	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.	N/A
1.1.9	<p>The Organisation shall record the relative portions and volumes of its feedstock, as coming from:</p> <ul 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), d. Certified sources against an SBP-recognised certification scheme as published by SBP. 	Revised	<p>The Organisation shall record the relative portions and volumes of its feedstock, as coming from:</p> <ul style="list-style-type: none"> 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. 	The intention is to track volumes and introduce the three avenues to manage the risk (CRA, RRA, Certified).
Feedback 5	A neat feature to include in the RRAs would be table that collates all the risks and lists them as either 'low risk' or 'specified risk' for a quick overview		SBP: Thank you for your suggestion. While outside the scope of this revision, each RRA already provides a consolidated overview of risk conclusions in Section 5, indicating low and specified risks.	

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Feedback 6	Very good update that clears up some of the confusion with the terms SBE and risk assessment that was left in the transfer from v 1.0 to 2.0. 3 clear paths now.		SBP: Thank you for your positive feedback. The revisions clarify the distinction between SBE and risk assessment pathways, resulting in three clear approaches.	
Feedback 7	SBE is mentioned everywhere (e.g. 3.3, 3.6, 3.6.2, ..., 7.1, etc.)		SBP: Thank you for your comment. Throughout the revision process, we have reviewed and updated all indicators that mention SBE, including sections 3.3, 3.6, 7.1, and others. Where references to SBE remain, they should be understood as referring to the due diligence system, as defined in the glossary.	

2. Traceability to the Supply Base

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.	Revised	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 areas are within the defined Supply Base.	Sourcing area changed from singular to plural.
Feedback 8	The criterion should clarify if this only relates to primary and secondary feedstock, or also include the origination point for post-consumer feedstock as in criterion 2.2		SBP: Thank you for your comment. This indicator applies to all sourced feedstocks. The scope is clarified through the definition of "Sourcing area". Sourcing area - The geographically defined area from which the biomass feedstock is harvested (for primary and processing residues) or generated (for post-consumer), from which reliable and independent information is available and where conditions are sufficiently homogeneous to evaluate the risk of the sustainability and legality characteristics of the biomass.	
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.	Revised	The Organisation shall have access to records describing the sourcing area of primary feedstock and processing residues.	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).
Feedback 9	The old text is not very clear and needs updating but the suggested new text does not align with the rationale for change. It does not exclude certified processing residues.		SBP: Thank you for your comment. The revised wording clarifies traceability requirements for all feedstock used for production of the certified biomass except for post-consumer feedstock.	

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Feedback 10	What type of "records describing the sourcing area of primary feedstock and processing residues" is SBP looking for? And to what level of detail do these documents need to go into?		SBP: Thank you for your comment. Please refer to the SBP Guidance for Standard 2 for this indicator: Gaining access to relevant information about sources of origin and the supply chain is a key component of the procurement system and a prerequisite for implementing due diligence in the sourcing of material. ... The SBP requirements for a traceability to the Supply Base follows conventional Chain of Custody systems. For this reason, limited guidance is provided for the requirements in this section.	
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.	No change	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.	N/A

3. Supply Base Evaluation (SBE)

Feedback 11	Should it be renamed to CRA if in 3.2 it is stated 'SBE has been replaced by the CRA'?		SBP: Thank you for your comment. CRA requirements are addressed in Section 6, while Section 3 correctly refers to the Supply Base Evaluation or due diligence system, as defined in the Glossary. No change is required.	
3.1	The Organisation shall develop, implement, and maintain an SBE unless exempted per the table in 3.2 below.	No change	The Organisation shall develop, implement, and maintain an SBE unless exempted per the table in 3.2 below.	N/A

Options for the applicability of the standard

3.2	<p>The Organisation shall identify the applicable requirements of this Standard using the following table:</p> <table border="1"> <thead> <tr> <th>Feedstock category</th> <th>+ certification status</th> <th>= SBP Standard 2 conformance requirements (with options where applicable)</th> </tr> </thead> <tbody> <tr> <td colspan="3">For SBP-compliant claims</td> </tr> </tbody> </table>	Feedstock category	+ certification status	= SBP Standard 2 conformance requirements (with options where applicable)	For SBP-compliant claims			Revised	<p>The Organisation shall identify the applicable requirements of this Standard using the following table:</p> <table border="1"> <thead> <tr> <th>Feedstock category</th> <th>+ certification status</th> <th>= SBP Standard 2 conformance requirements (with options where applicable)</th> </tr> </thead> <tbody> <tr> <td colspan="3">For SBP-compliant claims</td> </tr> </tbody> </table>	Feedstock category	+ certification status	= SBP Standard 2 conformance requirements (with options where applicable)	For SBP-compliant claims			To clarify the requirements and use of terms. SBE has been replaced by the CRA. SBP-recognised certification scheme is applied to eligible input claims, while the SBP-benchmarked certification scheme is used for risk mitigation purposes.
Feedstock category	+ certification status	= SBP Standard 2 conformance requirements (with options where applicable)														
For SBP-compliant claims																
Feedstock category	+ certification status	= SBP Standard 2 conformance requirements (with options where applicable)														
For SBP-compliant claims																

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	Primary	Not certified to an SBP-benchmarked certification scheme	SBE + Risk Management for specified risks OR RRA + Risk Management for specified risks		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-benchmarked certification scheme	SBE + Risk Management for specified risks* OR RRA + Risk Management for specified risks* *The Organisation may consider requirements of the SBP-recognised certification scheme as a potential RMM			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 the requirements of the SBP-benchmarked certification scheme as a potential RMM	
	Processing residues	Not certified to an SBP-recognised certification scheme	Evidence to prove 'processing residues' feedstock category, AND SBE + Risk Management for specified risks OR RRA + Risk Management for specified risks		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 'processing residues' feedstock category, and that the feedstock is certified by an SBP-recognised certification scheme			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 SBE, RRA nor other certification required)		Post-consumer	n/a	Evidence to prove 'post-consumer's feedstock category (No CRA, RRA, nor other certification required)	
	For SBP-controlled claims				For SBP-controlled claims			
	Primary and/or Processing residues	Certified to an SBP-recognised controlled scheme	Evidence to prove 'Processing residues' feedstock category AND evidence that the feedstock is certified by an SBP-recognised controlled scheme		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.	

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Feedback 12	Revise the sentence; something is missing between "scheme" and "SBP-recognised".			SBP: Thank you for your comment. The table has been updated to correct the wording and ensure clarity.
Feedback 13	Guidance is needed for those cases where the company's internal FSC or PEFC DDS system generates this claim, so that there is no proof on individual delivery level, and the DDS system is not within scope of the SBP audit			SBP: Thank you for your comment. SBP has updated the conformance requirements under indicator 3.2 to clarify that controlled material must be supported by a verified and audited due diligence system under an SBP-recognised control scheme. This ensures credibility and auditability of internal DDS systems used for controlled material. Please see Section 3.2: 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.
Feedback 14	the std should differentiate processing residues from 1st (roundwood input) vs secondary processing. this would allow to define better adapted requirements of forest origins traceability.			SBP: Thank you for the suggestion. At this stage, we do not plan to differentiate between primary (roundwood-based) and secondary processing within the standard. Both types of processing residues are required to meet the same forest-level compliance obligations under Standard 1, so an additional distinction would not change the applicability of the requirements. Your comment regarding the sustainability requirements for processing residues has been noted and will be further analysed and studied.
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).	No change	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).	N/A
General provisions				
3.4	The Organisation shall identify any Indicator within Standard 1 that may conflict with applicable legislation (national and sub-	No change	The Organisation shall identify any Indicator within Standard 1 that may conflict with applicable legislation (national and sub-national)	N/A

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	<p>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.</p> <p>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.</p>		<p>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.</p> <p>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.</p>	
3.5	<p>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.</p>	No change	<p>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.</p>	N/A
3.6	<p>The Organisation shall establish a process to ensure that the SBE is kept up to date.</p>	No change	<p>The Organisation shall establish a process to ensure that the SBE is kept up to date.</p>	N/A
3.6.1	<p>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.</p>	No change	<p>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.</p>	N/A

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3.6.2	<p>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, and - failure of any RMM within the RMP to address the specified risks. 	Revised	<p>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, and - failure of any RMM within the RMP to address the specified risks. - changes to published RRAs (including changes from an SBP-interim to an SBP-endorsed RRA) within 6 months of the change. 	Inclusion of the interim and endorsed RRAs.
3.6.3	The Organisation shall review and revise its SBE at least every five {5} years.	No change	The Organisation shall review and revise its SBE at least every five (5) years.	N/A
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.	No change	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.	N/A
3.8	<p>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:</p> <ul style="list-style-type: none"> - ecological and social values, 	No change	<p>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:</p> <ul style="list-style-type: none"> - ecological and social values, 	N/A

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	<ul style="list-style-type: none"> - 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, - stakeholder engagement. 		<ul style="list-style-type: none"> - 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, - 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.	No change	The Organisation shall evaluate the risk, considering the probability and the consequences of non-conformance, for each Indicator of Standard 1.	N/A
3.10	<p>The Organisation shall assign a single risk rating for each Indicator (and per sub-scope if applicable), as follows.</p> <p>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.</p> <p>b. Specified risk: All Indicators that cannot be categorised as low risk shall be considered specified risk.</p>	No change	<p>The Organisation shall assign a single risk rating for each Indicator (and per sub-scope if applicable), as follows.</p> <p>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.</p> <p>b. Specified risk: All Indicators that cannot be categorised as low risk shall be considered specified risk.</p>	N/A
3.11	<p>The Organisation shall consider feedstock as SBP-compliant if:</p> <p>a. the results of the Risk Assessment(s) conclude low risk for all Indicators, or</p> <p>b. the results of the Risk Assessment(s) conclude specified risk however the RMMs have</p>	No change	<p>The Organisation shall consider feedstock as SBP-compliant if:</p> <p>a. the results of the Risk Assessment(s) conclude low risk for all Indicators, or</p>	N/A

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	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.		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	N/A	New	<p>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> <p>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.</p>	From the already published Normative Interpretation. It clarifies that it is not acceptable to consider feedstock as SBP-compliant if there is evidence of non-conformance with SBP Standard 1 requirements, even though the risk assessment may show low risk. It also includes a list of actions for CH and CB to document and act on.
Feedback 15	This requirement raises concerns about how, in practice, a BP's obligation to identify such evidence will be assessed. There is a risk that an auditor, relying on retrospective or publicly available but previously unknown sources (e.g., NGO reports or media publications), may conclude that the BP should have known		SBP: Thank you for your comment. The indicator has been amended to apply only where the BP has evidence, thereby avoiding retrospective expectations and ensuring a proportionate, evidence-based assessment of non-conformities.	

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	<p>about the non-conformity, even if the information was not accessible to the BP at the time. As a result, BP may be required to prove their lack of knowledge, which is very difficult — if not impossible — creating uncertainty that is disproportionate to the level of control a company can realistically have over the flow of such information in the supply chain. It should be clarified:</p> <ul style="list-style-type: none"> • How is a BP's awareness of non-conformities defined and assessed? • Under what circumstances is it considered that a BP "should have known" about a non-conformity? 			
Feedback 16	<p>We're broadly in favour of the intent of the RRAs that SBP is seeking, but this draft criterion could be a major change to how the implementation of the Standard and a departure from the risk-based approach that is essential to the SBP system. The proposed text may lead CBs to adjust their approach away from the risk-based approach and management system of SBP, and this appear to be outside the scope of a limited update to the SBP v2.0 standards.</p>		<p>SBP: Thank you for your comment. The indicator was previously issued as a Normative Interpretation and has been integrated into the Standard to ensure consistent application. It does not introduce a new requirement or alter the SBP risk-based approach, but formalises existing guidance provided to Biomass Producers and Certificate Holders in response to implementation questions.</p>	
Feedback 17	<p>That's why it makes no sense to have any Risk Assessment, especially at INDICATOR level. All CRITERIA (requirements) shall be considered and must be checked by the Certification Body/auditors, that must be able to interpret and conclude about the compliance with the CRITERIA accordingly the local context, taking into account the size, intensity, laws, benefits, relationship with the forest, labour conditions, forest type. forest products, ecosystem services, etc. Indicators shall be considered as INDICATORS, not as requirements.</p>		<p>SBP: Thank you for the comment. The risk-based approach to indicator-level assessments continues to serve an important function within the SBP system. It helps ensure that certificate holders and certification bodies allocate their resources in the most effective way to demonstrate legality and sustainability and mitigate the risks identified.</p>	

4. Supply Base Reporting

4.1	The Organisation shall prepare a Supply Base Report (SBR) using the SBP Audit Portal.	No change	The Organisation shall prepare a Supply Base Report (SBR) using the SBP Audit Portal.	N/A
4.2	The Organisation shall update its SBR at least annually.	No change	The Organisation shall update its SBR at least annually.	N/A
4.3	The Organisation shall make the SBR, including Annex 1 if applicable, available on request to stakeholders.	No change	The Organisation shall make the SBR, including Annex 1 if applicable, available on request to stakeholders.	N/A

No.	SBP Standard 2 v2.0	Revision	SBP Standard 2 v2.1	Rationale for change
5. Supply Base Verifiers (SBVs)				
5.1	SBVs shall not remove or weaken the indicators set out in SBP Standard 1.	No change	SBVs shall not remove or weaken the indicators set out in SBP Standard 1.	N/A
5.2	SBVs shall not alter the intent of the indicators.	No change	SBVs shall not alter the intent of the indicators.	N/A
5.3	For each Indicator in SBP Standard 1, the Organisation shall identify and maintain a list of SBVs in accordance with the following:	No change	For each Indicator in SBP Standard 1, the Organisation shall identify and maintain a list of SBVs in accordance with the following:	N/A
5.3.1	The Organisation shall identify all applicable laws within the Supply Base that meet the Indicators of SBP Standard 1.	No change	The Organisation shall identify all applicable laws within the Supply Base that meet the Indicators of SBP Standard 1.	N/A
5.3.2	The Organisation shall determine SBVs to evaluate whether these laws are enforced.	No change	The Organisation shall determine SBVs to evaluate whether these laws are enforced.	N/A
5.3.3	The Organisation shall determine SBVs to evaluate whether the laws are implemented by the operators within the Supply Base.	No change	The Organisation shall determine SBVs to evaluate whether the laws are implemented by the operators within the Supply Base.	N/A
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.	Revised	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.	The intention is to align with the REF (Risk Evaluation Framework) and to cover all four evaluation steps.
Feedback 18	Regarding the SBP described change only three evaluation steps are referred to, in some jurisdictions four evaluation steps were used.		SBP: Thank you for the comment. The fourth evaluation step is included in section 5.3.5.	

No.	SBP Standard 2 v2.0	Revision	SBP Standard 2 v2.1	Rationale for change
5.3.5	N/A	New	The Organisation shall determine SBVs to evaluate the current conditions.	The requirement was missing and has been added to align with the REF.
Feedback 19	Current condition is evaluated when making the risk designation for the risk assessment. Is the intent of this change to require CH to evaluate current condition of risk conditions of the RRA as is required for their own SBE?		SBP: Thank you for your comment. The intent of this indicator is to ensure that current conditions of the Supply Base Verifiers (SBV) are evaluated when a Company Risk Assessment (CRA) is used. This evaluation should be reviewed annually, in line with requirement 4.2, which requires an annual review of the Supply Base Report (SBR). SBP does not currently specify separate annual review requirements for the CRA, Risk Management Plan (RMP), or the SBV.	
5.4	N/A	New	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.
Feedback 20	Please clarify and provide examples or guiding documents for what 5.4 means. Also, what is the SBP evaluation report?		SBP: Thank you for your comment. Requirement 5.4 applies where a Biomass Producer sources exclusively feedstock certified under an SBP-benchmarked certification scheme. Its intent is to avoid duplication of risk assessment where SBP indicators are already fully covered by the benchmarked scheme. In such cases, SBVs and risk assessments are required only for indicators identified as partially met or not met in the relevant SBP benchmarking outcome. The SBP evaluation report refers to the SBP benchmarking and evaluation documentation that identifies the level of alignment between SBP indicators and recognised certification schemes. The wording of the indicator has been amended to improve clarity on its applicability and reference to SBP-benchmarked schemes.	

6. Risk Assessment

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.	Revised	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.
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No.	SBP Standard 2 v2.0	Revision	SBP Standard 2 v2.1	Rationale for change
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.	Revised	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.
Feedback 21	Need clarification regarding which activities need to be covered by the risk assessments.		<p>SBP: Thank you for your comment. SBP acknowledges the need for additional clarity on the activities to be covered by the Company Risk Assessment. The CRA is intended to include all activities within the Supply Base that may affect conformity with SBP Standard 1, with a focus on activities linked to the origin of the feedstock.</p> <p>These activities may include, for example (but are not limited to): forest management practices, harvesting operations, compliance with applicable legislation, biodiversity protection measures, soil and water protection, use of chemicals, and worker health and safety. Further clarification and practical examples will be provided in the updated SBP Guidance, which will accompany the revised indicators in version 2.1.</p>	
Feedback 22	Very good update that clears up some of the confusion with the terms SBE and risk assessment that was left in the transfer from v 1.0 to 2.0. CRA is well defined like this.		SBP: Thank you for the positive feedback.	
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.	No change	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.	N/A
6.4	The Organisation shall justify the risk rating using the identified SBVs. The Organisation shall include this information in its SBR.	No change	The Organisation shall justify the risk rating using the identified SBVs. The Organisation shall include this information in its SBR.	N/A

No.	SBP Standard 2 v2.0	Revision	SBP Standard 2 v2.1	Rationale for change
6.5	The Risk Assessment shall be signed off by senior management in the Organisation.	No change	The Risk Assessment shall be signed off by senior management in the Organisation.	N/A

7. Risk Management

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.	Revised	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.
Feedback 23	For clarity, should the new CRA term not be used here instead?		SBP: Thank you for your comment. For clarity and consistency with the revised terminology, the CRA term has been incorporated into the requirement.	
7.2	The Organisation shall implement any RMMs proposed by SBP (i.e., in Instruction Documents) or by SBP-endorsed RRAs.	Revised	The Organisation shall implement any RMMs marked as mandatory in SBP RRAs or other normative documents.	Clarification regarding the compulsory mitigation measures.
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.	No change	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.	N/A
Feedback 24	This language is rather vague. I recommend to be more specific, e.g. what should the process contain, are there minimum requirements to the evaluation? Otherwise there is too much room for CBs to interpret in their own way.		SBP: Thank you for your comment. Further clarification on the development and evaluation of Organisation-defined Risk Management Measures will be provided in the SBP Guidance, rather than prescribed in the Standard.	

No.	SBP Standard 2 v2.0	Revision	SBP Standard 2 v2.1	Rationale for change
7.4	N/A	New	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.
Feedback 25	Could you please clarify the intent behind Indicator 7.4? What is its primary objective? Additionally, how can a pellet producer effectively implement a RMP at the forest level when the producer does not own the land?		SBP: Thank you for the comment. The intent of Indicator 7.4 is to ensure that the Organisation does not only develop a Risk Mitigation Plan (RMP) but also has a functional system in place to verify that the Operators responsible for forest-level activities are actually implementing the required mitigation measures. It also recognises that pellet producers typically do not own forests or manage harvesting operations directly.	
Feedback 26	RMP not defined in glossary.		SBP: Thank you for your comment. The term RMP has been added to the Glossary to ensure clarity and consistency.	
7.5	The Organisation shall ensure that the RMP identifies: a. to whom in the Supply Base the RMMs applies, to address all specified risks; b. the timeframe by when the RMMs shall be implemented; and c. the Means of Verification of the effectiveness of the RMMs to reduce the risk rating to low risk.	No change	The Organisation shall ensure that the RMP identifies: a. to whom in the Supply Base the RMMs applies, to address all specified risks; b. the timeframe by when the RMMs shall be implemented; and c. the Means of Verification of the effectiveness of the RMMs to reduce the risk rating to low risk.	N/A
7.6	RMMs shall be justified and documented, with records of implementation maintained.	No change	RMMs shall be justified and documented, with records of implementation maintained.	N/A
7.7	The RMP shall be signed off by senior management in the Organisation.	No change	The RMP shall be signed off by senior management in the Organisation.	N/A
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.	No change	The Organisation shall monitor the effectiveness of its RMMs at least every 12 months but in any case, prior to its annual audit.	N/A

No.	SBP Standard 2 v2.0	Revision	SBP Standard 2 v2.1	Rationale for change
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.	No change	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.	N/A
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.	No change	The Organisation shall stop considering as SBP-compliant feedstock sourced from suppliers who, following request, fail to demonstrate that they are implementing RMMs.	N/A

8. Stakeholder Engagement

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: a. Supply Base Verifiers, b. Risk Assessment and risk ratings, and c. the Risk Management Plan, Risk Management Measures and Means of Verification.	Revised	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: 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.
Feedback 27	Good clarification around stakeholder engagement		SBP: Thank you for the positive comment.	
8.2	The Organisation shall engage with its stakeholders each time the SBE is revised.	No change	The Organisation shall engage with its stakeholders each time the SBE is revised.	N/A

No.	SBP Standard 2 v2.0	Revision	SBP Standard 2 v2.1	Rationale for change
8.3	The Organisation shall seek to address relevant stakeholder concerns; it is not required to achieve a consensus with stakeholders.	No change	The Organisation shall seek to address relevant stakeholder concerns; it is not required to achieve a consensus with stakeholders.	N/A
8.4	The Organisation shall allow stakeholders at least one month to provide feedback before the SBE is finalised.	No change	The Organisation shall allow stakeholders at least one month to provide feedback before the SBE is finalised.	N/A
8.5	The Organisation shall provide stakeholders with adequate information as a basis for informed comment but does not have to provide confidential information.	No change	The Organisation shall provide stakeholders with adequate information as a basis for informed comment but does not have to provide confidential information.	N/A
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.	No change	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.	N/A
8.7	The Organisation shall provide to those stakeholders who engaged in the process feedback on their comments and the revised SBR.	No change	The Organisation shall provide to those stakeholders who engaged in the process feedback on their comments and the revised SBR.	N/A

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

No.	SBP Standard 2 v2.0	Revision	SBP Standard 2 v2.1	Rationale for change
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.	No change	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.	N/A
1.2	<p>Verification shall include the following elements:</p> <p>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 postconsumer feedstock. These records shall specify:</p> <ul style="list-style-type: none"> 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. <p>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</p>	No change	<p>Verification shall include the following elements:</p> <p>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 postconsumer feedstock. These records shall specify:</p> <ul style="list-style-type: none"> 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. <p>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.</p>	N/A

No.	SBP Standard 2 v2.0	Revision	SBP Standard 2 v2.1	Rationale for change
	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.	No change	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.	N/A
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.	No change	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.	N/A
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.	No change	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.	N/A
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.	No change	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.	N/A

No.	SBP Standard 2 v2.0	Revision	SBP Standard 2 v2.1	Rationale for change
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.	No change	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.	N/A
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.	No change	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.	N/A
3.3	The legal owner may contract another external, suitably qualified party to operate the supplier audit.	No change	The legal owner may contract another external, suitably qualified party to operate the supplier audit.	N/A
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.	No change	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.	N/A
3.5	The Organisation shall evaluate and verify documents and other evidence regarding the quantity, quality and conformance with SBP	No change	The Organisation shall evaluate and verify documents and other evidence regarding the quantity, quality and conformance with SBP	N/A

No.	SBP Standard 2 v2.0	Revision	SBP Standard 2 v2.1	Rationale for change
	<p>definitions of processing residues and post-consumer feedstock, including:</p> <p>a. Supplier’s instructions or procedures put in place to control and classify the processing residues and/or post-consumer feedstock.</p> <p>b. When applicable, training or instructions provided to the supplier’s personnel in relation to categorisation and control of processing residues and/or postconsumer feedstock.</p> <p>c. Registers establishing feedstock origin (e.g., photographs, addresses of demolished buildings, invoices).</p>		<p>definitions of processing residues and post-consumer feedstock, including:</p> <p>a. Supplier’s instructions or procedures put in place to control and classify the processing residues and/or post-consumer feedstock.</p> <p>b. When applicable, training or instructions provided to the supplier’s personnel in relation to categorisation and control of processing residues and/or postconsumer feedstock.</p> <p>c. Registers establishing feedstock origin (e.g., photographs, addresses of demolished buildings, invoices).</p>	
3.6	<p>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.</p>	No change	<p>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.</p>	N/A
3.7	<p>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.</p>	No change	<p>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.</p>	N/A