



Standards Document

SBP Standard 3: Requirements for Certification Bodies

Sustainable Biomass Program

sbp-cert.org



Version 2.1

Formal status of document: approved by the Standards Committee

Approval date:	25 February 2026
Publication date:	29 April 2026
Effective date:	29 July 2026
Transition period:	29 July 2026 to 28 October 2027
Review date:	16 March 2028

Document history

Version 1.0:	Published 26 March 2015
Version 2.0:	Published 10 May 2023
Version 2.1:	Published 29 April 2026

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 (as applicable) 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 3 sets out the requirements that CBs must follow when assessing the conformity of Organisations against the SBP Standards. These requirements are additional to the requirements of ISO 17065.

SBP Standard 3 defines the requirements to be followed during the key stages of the certification process, including preparing and conducting evaluations, evaluation compliance, handling non-conformances, certification decisions, issuing and managing certificates, etc.

Using SBP Standard 3, accredited CBs evaluate Organisations against the criteria set in:

- SBP Standard 2, for Organisations that are Biomass Producers (BPs) sourcing feedstock for the production of biomass;
- SBP Standard 4, for all Organisations wishing to use the SBP-compliant or SBP-controlled claim;
- SBP Standard 5 for all Organisations; and
- SBP Standard 6 for Organisations wishing to certify their GHG calculations.

To obtain and maintain their accreditation status, the SBP-appointed Accreditation Body verifies the conformance of CBs with the requirements of SBP Standard 3.

C Scope

Accredited CBs shall carry out all certification activities related to SBP certification in conformance with SBP Standard 3.

D How to use this document

Standard 3 sets out the requirements for Certification Bodies to set up and manage their SBP certification activities.

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

Accredited CBs shall also refer to the SBP Instruction Documents and/or Normative Interpretations related to Standard 3 as published by SBP.

E Normative references

ISO 14065:2020 General principles and requirements for bodies validating and verifying environmental information

ISO/IEC 17065:2012 Conformity assessment. Requirements for bodies certifying products, processes and services

ISO 19011:2018 Guidelines for auditing management systems

SBP Standard 1: Feedstock Compliance

SBP Standard 2: Feedstock Verification

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 3 v2.0	SBP Standard 3 v2.1	Comments
<p>1.1.1 The Certification Body (CB) shall hold SBP accreditation in accordance with ISO 17065.</p>	<p>1.1.1 The Certification Body (CB) is required to maintain SBP accreditation in accordance with ISO 17065 and to meet all requirements specified in this standard and other normative documents. If the CB conducts audits under Standard 6, it must also maintain ISO 14065 accreditation.</p>	<p>Alignment with RED by introducing a specific requirement for GHG emissions audit.</p>
<p>1.1.2 The CB shall implement all applicable requirements of SBP Standard 3 including the scope of accreditation for SBP Standards 1 and 2 for the scope 'SBP feedstock sourcing' and/or SBP Standard 4 for 'SBP Chain of Custody'.</p>	<p>1.1.2 The CB shall implement all applicable requirements of SBP Standard 3. The CB shall hold accreditation for SBP Standards 4 and 5. The CB may choose to hold accreditation for SBP Standards 1, 2, and 6.</p>	<p>The wording of the indicator has been revised to improve clarity.</p>
<p>1.1.5 The Forest Management (FM) or Chain of Custody (CoC) scope of the CB's FSC® or PEFC accreditation shall be equivalent to the applicable scope for their SBP accreditation (feedstock sourcing or CoC respectively).</p>	<p>1.1.5 The Forest Management (FM) or Chain of Custody (CoC) scope of the CB's FSC®, PEFC or SFI accreditation shall be equivalent to the applicable scope for their SBP accreditation (feedstock sourcing or CoC, respectively).</p>	<p>SFI accreditation added.</p>
<p>1.1.7 The geographical scope of the CB's FSC® or PEFC accreditation shall match the applicable scope for their SBP accreditation and shall cover the Supply Base of the Client.</p>	<p>1.1.7 The geographical scope of SBP accreditation shall match the geographical scope of FSC and/or PEFC Chain of Custody and/or SFI accreditations and shall cover the Supply Base of the Client.</p>	<p>To clarify that the requirement about geographical scope of a proxy accreditation shall correspond to CoC accreditation and not to FM accreditation, as CoC accreditation is relevant for a sourcing standard.</p>

SBP Standard 3 v2.0	SBP Standard 3 v2.1	Comments
<p>4.1 The CB shall ensure that auditors are qualified and maintain their qualification for conducting evaluations according to at least one of the following:</p> <ul style="list-style-type: none"> a. for evaluations against SBP Standards 1 and 2, and related documents: FSC Forest Management, or any PEFC endorsed Forest Management standard; b. for all other SBP Standards: FSC or PEFC endorsed CoC standards. 	<p>4.1 The CB shall ensure that auditors are qualified and maintain their qualification for conducting evaluations according to at least one of the following:</p> <ul style="list-style-type: none"> a. Except in the cases mentioned in b., for evaluations against SBP Standards 1 and 2, and related documents: FSC Forest Management, or any PEFC endorsed Forest Management standard; b. FSC or PEFC endorsed CoC standards, for all other SBP Standards and in the following cases where the: <ul style="list-style-type: none"> – BP only sells SBP-controlled biomass; – EU RED Level A risk assessment for the BP's Supply Base has rated all indicators as low risk; – SBP Regional Risk Assessment for the BP's Supply Base rated all indicators as low risk; – BP only sources Processing Residues feedstock with a claim from an SBP-recognised certification scheme (i.e., FSC or PEFC). 	<p>Allowance to reduce the unnecessary administrative burden for the cases where FM auditor qualification is not essential.</p>

SBP Standard 3 v2.0	SBP Standard 3 v2.1	Comments
<p>4.2 For qualification to evaluate conformance against SBP Standards 1 and 2, and related documents, auditors shall have a:</p> <p>a. tertiary education in a relevant discipline (e.g., forest or other natural resource management, and/or labour/social issues) and three (3) years of professional experience relevant to the scope of the evaluation, or;</p> <p>b. secondary education in a relevant discipline (e.g., forest and/or other natural resource management, and/or labour/social issues) and five (5) years of professional experience relevant to the scope of the evaluation and to their role (e.g., legislation, regulations or other forest certification standards).</p> <p>Note to 4.2 a and 4.2 b: auditors shall be qualified for specific geographical scopes they have experience for. See clause 6.4 for requirements related to composition of evaluation teams to ensure their overall geographical qualification.</p>	<p>4.2 For qualification to evaluate conformance against SBP Standards 1 and 2, and related documents, auditors and quality reviewers shall have a:</p> <p>a. tertiary education in a relevant discipline (e.g., forest or other natural resource management, and/or labour/social issues) and three (3) years of professional experience relevant to the scope of the evaluation, or;</p> <p>b. secondary education in a relevant discipline (e.g., forest and/or other natural resource management, and/or labour/social issues) and five (5) years of professional experience relevant to the scope of the evaluation and to their role (e.g., legislation, regulations or other forest certification standards).</p> <p>Note to 4.2 a and 4.2 b: auditors shall be qualified for specific geographical scopes they have experience for. See clause 6.4 for requirements related to composition of evaluation teams to ensure their overall geographical qualification.</p>	<p>Clarification regarding the qualification requirements for Quality reviewer.</p>
<p>4.3 For qualification to evaluate conformance against SBP Standard 6, auditors shall have a minimum of two (2) years' experience in biomass or biofuel life-cycle assessment calculation of energy and carbon balances and be knowledgeable of the methodology relevant to the scope of the evaluation.</p>	<p>4.3 For qualification to evaluate conformance against SBP Standard 6, auditors and quality reviewers shall have a minimum of two (2) years' experience in biomass or biofuel life-cycle assessment calculation of energy and carbon balances and be knowledgeable of the methodology relevant to the scope of the evaluation.</p>	<p>Clarification regarding the qualification requirements for a Quality reviewer.</p>
<p>4.6 The CB shall ensure that auditors have successfully passed the initial auditor training course(s) approved by SBP.</p>	<p>4.6 The CB shall ensure that auditors and quality reviewers have successfully passed the initial auditor training course(s) approved by SBP.</p>	<p>Clarification regarding the qualification requirements for a Quality reviewer.</p>

SBP Standard 3 v2.0	SBP Standard 3 v2.1	Comments
<p>4.7 The CB shall ensure that active auditors have successfully passed any SBP-approved auditor training courses that are required to maintain competence (e.g., after an SBP Standard revision).</p> <p>Note: details about training courses, e.g., timelines for completion, will be provided in a separate training schedule document upon availability.</p>	<p>4.7 The CB shall ensure that active auditors and quality reviewers have successfully passed any SBP-approved auditor training courses required to maintain competence (e.g., following an SBP Standard revision).</p>	<p>Clarification regarding the qualification requirements for a Quality reviewer.</p>
<p>4.8 The CB shall ensure that active auditors maintain their competence regarding SBP interpretations, CB procedures and best audit practice through regular training events.</p>	<p>4.8 The CB shall ensure that active auditors and quality reviewers maintain their competence regarding SBP interpretations, CB procedures and best audit practice through regular training events.</p>	<p>Clarification regarding the qualification requirements for a Quality reviewer.</p>
<p>6.3 The CB shall inform the Applicant prior to the evaluation of the applicable normative requirements.</p>	<p>6.3 Prior to the evaluation, the CB shall inform the Applicant of the applicable normative requirements and that the SBP certificate can only be issued if the Instruction Document EU RED is included in the scope of the audit.</p>	<p>Clarification regarding the applicability of ID EU RED.</p>
<p>New</p>	<p>6.5 The CB shall classify the activity of the Certificate Holders as Biomass Producers, Traders or End Users. The CB shall classify the Certificate Holder as End-Users if they ultimately consume SBP-certified biomass, regardless of whether Standard 6 is included in their scope. If the End-User also engages in trade activities, these shall be recorded as secondary activities, with the End-User remaining the primary Certificate Type classification.</p>	<p>Clarification that entities consuming SBP-certified biomass will always be registered as End-Users and therefore will need to be audited onsite.</p>

SBP Standard 3 v2.0	SBP Standard 3 v2.1	Comments
<p>6.6 The CB shall ensure that the evaluation team undertaking an evaluation against any SBP Standard has the combined necessary knowledge and experience to evaluate the Client against the applicable Standard(s), for the given scope of the evaluation and/or certificate and the geographical location, including the following:</p> <p>a. For evaluating against SBP Standards 1 and 2: knowledge and experience in land use criteria, such as ecology, natural science, forestry, silviculture, social science or similar.</p> <p>b. For evaluating against SBP Standard 6: knowledge and experience in GHG criteria (GHG emissions calculation at the End-user level), including demonstrated experience in life-cycle assessment, and specific experience in evaluating GHG emissions calculations following the calculation methodologies which are accepted by the relevant regulatory authorities (e.g., REDII or any other requirements from European member states), and relevant experience depending on the type of evaluations to be conducted by the individual auditor.</p> <p>c. For evaluating against SBP Standard 4: knowledge and experience in CoC criteria: Experience in mass balance, supply chain logistics, bookkeeping, traceability, data handling or similar.</p>	<p>6.7 The CB shall ensure that the evaluation team undertaking an evaluation against any SBP Standard has the combined necessary knowledge and experience to evaluate the Client against the applicable Standard(s), for the given scope of the evaluation and/or certificate and the geographical location, including the following:</p> <p>a. For evaluating against SBP Standards 1 and 2: knowledge and experience in land use criteria, such as ecology, natural science, forestry, silviculture, social science or similar.</p> <p>b. For evaluating against SBP Standard 6: knowledge and experience in GHG criteria (GHG emissions calculation at the End-user level), including demonstrated experience in life-cycle assessment, and specific experience in evaluating GHG emissions calculations following the calculation methodologies which are accepted by the relevant regulatory authorities (e.g., REDIII or any other requirements from European member states), and relevant experience depending on the type of evaluations to be conducted by the individual auditor.</p> <p>c. For evaluating against SBP Standard 4: knowledge and experience in CoC criteria: Experience in mass balance, supply chain logistics, bookkeeping, traceability, data handling or similar.</p>	<p>REDII reference updated.</p>

SBP Standard 3 v2.0	SBP Standard 3 v2.1	Comments
<p>6.22 When an evaluation of risk ratings and/or RMMs needs to take place at the FMU and/or supplier level, the CB shall calculate the sample to be evaluated using the following formula: $Y = 0.8 \text{ SQR } X$ (initial and re-evaluations) or $Y = 0.6 \text{ SQR } X$ (surveillance evaluations) where X = number of sourcing areas or suppliers. If both are applicable, the larger number prevails.</p> <p>Note: Example calculation: If two sawmills supply a pellet mill, and each of the two sawmills buys from 100 sourcing areas, the sample should be calculated from 200 sourcing areas, not from two sawmills.</p>	<p>6.23 If RMMs are implemented at the feedstock-producing level (e.g. forest) and/or supplier level, the CB must conduct its evaluation of RMMs at the corresponding level. The CB is required to calculate the sample for evaluation using the following formula: $Y = 0.8 \text{ SQR } X$ (initial and re-evaluations) or $Y = 0.6 \text{ SQR } X$ (surveillance evaluations)</p> <p>Where X = a supply unit (Forest Management Unit (FMU), farm, (TOF) suppliers, etc.) where a BP's RMM are implemented.</p> <p>CB may develop a sampling methodology to use an alternative coefficient. This shall be properly justified and documented in the PSR (e.g., a large number of small forest owners).</p>	<p>More flexibility with sampling for situations where a very high number of supply units would result in a disproportionately large sample. At the same time, any deviation and use of alternative methodology needs to be justified and documented in the public reports.</p>

SBP Standard 3 v2.0	SBP Standard 3 v2.1	Comments
<p>7.7 When evaluating processing residues or post-consumer feedstock, the auditor shall check at least the following:</p> <ul style="list-style-type: none"> a. documentation to confirm the origin of the feedstock, i.e., the supply area for primary residues and the processing facility for post-consumer; b. classification of the feedstock as processing residues or post-consumer feedstock; c. information on feedstock suppliers; and d. the systems used by BPs for accuracy, reliability, and protection against fraud, including verification that materials are not intentionally modified or discarded so that the consignment or part thereof could become a waste or residue. 	<p>7.7 When evaluating processing residues or post-consumer feedstock sourcing, the auditor shall check compliance with Annex 1 of Standard 2.</p>	<p>Improvement to avoid misinterpretation regarding the requirements.</p>
<p>8.9 Timelines for corrective action requests shall commence from the day of the certification decision.</p>	<p>8.9 Timelines for corrective action requests shall commence from the day of the certification decision, except for major corrective action requests, which shall commence from the date when the major corrective action request was formally communicated in writing to the Certificate Holder, which shall be no later than 30 days from the day of the audit closing meeting.</p>	<p>The requirement was revised to align with the timeline for writing a public summary report (90 days). It also defines a special rule where, in case of major non-conformances, the decision has to be taken faster to avoid longer timelines for major non-conformances.</p>
<p>8.14 CBs shall follow additional non-conformance and corrective action request handling procedures when specified in normative SBP documents (e.g., in SBP Framework Instruction Document REDII: Bridging requirements for meeting REDII).</p>	<p>8.14 CBs shall follow additional non-conformance and corrective action request handling procedures when specified in normative SBP documents (e.g., in SBP Framework Instruction Document EU RED: Bridging Requirements for Meeting the Renewable Energy Directive (EU/2023/2413)).</p>	<p>REDII reference updated.</p>

SBP Standard 3 v2.0	SBP Standard 3 v2.1	Comments
New	<p>8.15 Where a non-conformance (NCR) is identified when auditing a Biomass Producer's Supply Base Evaluation process (Standard 2), that NCR shall be categorised as a major NCR under the following circumstances:</p> <ul style="list-style-type: none"> a) Failure to develop a Supply Base Evaluation process; b) Absence of credible and verifiable information that demonstrates the origin of feedstock; c) Failure of the organisation to demonstrate that its risk assessment (CRA) has been conducted in accordance with the applicable SBP requirements; d) Failure to use an SBP-endorsed Regional Risk Assessment, if such exists; e) Use of feedstock originating from unevaluated sourcing areas, in other words, without the Certification Body's approval of a revised SBE scope for the organisation (new sourcing areas may only be added through a scope change audit); f) Failure to establish and implement control or mitigation measures; or g) Failure to provide information required to be made publicly available in the Supply Base Report. 	<p>This requirement was introduced to safeguard the robustness of the SBP certification process and guide auditors with regard to non-conformance grading.</p>

SBP Standard 3 v2.0	SBP Standard 3 v2.1	Comments
<p>10.1 Prior to making a certification decision, the CB shall submit the draft evaluation report to a formal peer review process, for the following evaluation scopes:</p> <ul style="list-style-type: none"> a. initial and re-evaluations that include an SBE, b. any evaluation that includes an extension of scope of the SBE, and c. any evaluation of a suspended certificate (for consideration of re-instatement of certification) that includes an SBE. <p>Note: A CB may apply to SBP to waive the peer review where this would not affect the quality of the evaluation or reporting, e.g., where suspension has resulted from non-payment of CB fees.</p>	<p>10.1 Prior to making a certification decision, the CB shall submit the draft evaluation report to a formal peer review process for the following evaluation scopes:</p> <ul style="list-style-type: none"> a. initial and re-evaluations that include CRA and/or EU RED Level B, b. initial and re-evaluations that include RRA with Specified Risks and/or EU RED Level B, c. any evaluation that includes the following changes: adding a sub-scope, adding RRA with Specified Risks, adding CRA, or EU RED Level B, and d. any evaluation of a suspended certificate (for consideration of re-instatement of certification) that includes CRA or RRA with Specified Risks and/or EU RED Level B. <p>Note: A CB may apply to SBP to waive the peer review where this would not affect the quality of the evaluation or reporting, e.g., where suspension has resulted from non-payment of CB fees.</p>	<p>Clarification on when the peer review is needed for various cases of SBEs.</p>
<p>11.6 CBs shall take certification decisions no later than one month after the date of the closing meeting of the evaluation.</p>	<p>11.6 CBs shall make certification decisions no later than three months after the closing meeting of the evaluation audit.</p>	<p>The requirement was revised to align it with a 90-day timeline for report writing.</p>
<p>Annex 1, 1.10 The period of validity of an SBP certificate shall not exceed five (5) years. As such, a transferred certificate shall retain the same expiry date as the previous certificate unless a full re-evaluation was conducted.</p>	<p>12.12 The period of validity of an SBP certificate shall not exceed five (5) years. As such, a transferred certificate shall retain the same expiry date as the previous certificate unless a full re-evaluation was conducted.</p>	<p>No change, indicator moved to section 12 from Annex 1 (1.10).</p>

SBP Standard 3 v2.0	SBP Standard 3 v2.1	Comments
New	<p>12.13 The period of validity of an SBP-certificate may be extended for up to six (6) months to permit re-evaluation to be completed, when justified by circumstances beyond the control of the Certification Body and its client. Once the Certification Body has satisfied itself that its client will maintain its conformity with the applicable SBP requirements until the new expiry date, the Certification Body shall take the following steps:</p> <ul style="list-style-type: none"> a. record such circumstances; b. inform SBP Secretariat and provide: <ul style="list-style-type: none"> – the rationale for requesting an extension to the validity date, and – a new validity date (not more than six (6) months beyond the original expiry date). <p>SBP will review the request and if approved shall update the entry on the SBP Audit Portal. SBP will consider each extension on a case-by-case basis, and none shall be taken as forming any precedent.</p>	New clause to allow exceptional extension of certificate validity to accommodate circumstances which are out of the Certificate Holder and Certification Body's control.
New	<p>14.5 In the event that SBP suspends or terminates the Trademark License Agreement (TMLA) with a Certificate Holder, the Certification Body shall suspend or terminate the corresponding SBP certificate issued to that Certificate Holder.</p>	SBP provide clarity on what TMLA suspension or termination means to the certificate validity.
<p>Annex 1: Certificate Transfers 1.10 Moved to Section 12 (Indicator 12.12)</p>	<p>12.12</p>	No changes, but the indicator was moved.

1 Certification Body eligibility requirements

- 1.1** To carry out evaluations against SBP Standards, the following requirements shall be met, as applicable based on the scope of SBP accreditation:
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- 1.1.1** The Certification Body (CB) is required to maintain SBP accreditation in accordance with ISO 17065 and to meet all requirements specified in this standard and other normative documents. If the CB conducts audits under Standard 6, it must also maintain ISO 14065 accreditation.
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- 1.1.2** The CB shall implement all applicable requirements of SBP Standard 3. The CB shall hold accreditation for SBP Standards 4 and 5. The CB may choose to hold accreditation for SBP Standards 1, 2, and 6.
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- 1.1.3** The CB shall hold at least one of the following accreditations: Forest Stewardship Council® (FSC®), and/or Programme for the Endorsement of Forest Certification (PEFC), and/or Sustainable Forest Initiative® (SFI®).
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- 1.1.4** In case the FSC, PEFC or SFI accredited legal entity is different from the SBP accredited office, the CB shall demonstrate that the FSC®, PEFC or SFI accredited systems and procedures are effectively implemented at the SBP accredited office.
-
- 1.1.5** The Forest Management (FM) or Chain of Custody (CoC) scope of the CB's FSC, PEFC or SFI accreditation shall be equivalent to the applicable scope for their SBP accreditation (feedstock sourcing or CoC, respectively).
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- 1.1.6** For the certification of SBP Traders and End-users, the FSC® or PEFC accreditation scope for CoC is sufficient for the CB.
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- 1.1.7** The geographical scope of SBP accreditation shall match the geographical scope of FSC and/or PEFC Chain of Custody and/or SFI accreditations and shall cover the Supply Base of the Client.

2 Certification agreement

- 2.1** The CB certification agreement shall require that the Client complies at least with the following:
- a. The Client provides the CB and SBP, and their respective authorised personal or entities, access to the Client's premises at any reasonable time (or to arrange for such authorised representatives to have access to other relevant premises owned or controlled by the Client or its group companies) for the purpose of inspecting and taking copies of any information, documentation, goods, books and records deemed necessary by the CB or SBP.
 - b. The Client promptly provides to the CB and SBP, and their respective authorised agents, all such information, documentation books and records deemed necessary by the CB or SBP.
 - c. The Client complies and continues to comply with all the CB's and SBP requirements, arrangements and licences regarding claims, logos, certification marks, trademarks or any other intellectual property rights of the CB and SBP, including maintaining a valid Trademark Licensing Agreement with SBP.

- d. The Client informs its CB within 15 calendar days about changes within its Supply Base, operations, management and/or subcontractors that may affect the validity and/or scope of their certification, or the timing of their next evaluation.
- e. The Client complies and continues to comply with all the CB's conditions and terms for maintaining, renewing and re-issuing of the certificate, including but not limited to the full implementation of corrective actions to resolve all non-conformances that were identified prior to the issue of the certificate, where applicable.
- f. The Client undergoes surveillance as determined by the CB.
- g. The Client corrects any non-conformances with the applicable Standard(s) identified during surveillance evaluations within the period specified by the CB.
- h. The Client complies and continues to comply with all agreements and arrangements between the Client and SBP and all SBP requirements.
- i. Upon suspension, withdrawal, or termination of certification, the Client shall:
 - i. immediately, at its own expense, remove SBP's name (in any form), initials, logo, certification mark, trademarks and intellectual property from its products, information, website, documents, advertising or marketing or any other materials;
 - ii. immediately cease and desist from using SBP's name (in any form), initials, logo, certification mark, trademarks and intellectual property;
 - iii. immediately cease to sell any products with SBP claims or references or SBP name or any SBP marks or any intellectual property relating to SBP or make any claims or representation (oral or written) that imply that it complies with the requirements of the certificate, CB or SBP.
- iv. Where a product (including biomass) has been supplied with an SBP claim or representation or mark, immediately identify all relevant customers/purchasers who are in receipt of, or have ordered such product, and notify each of such customers/purchasers of the suspension, withdrawal or termination (as the case may be) in writing within three (3) business days of the suspension, withdrawal or termination and maintain records of such notification.
- v. provide such co-operation and information as may be required by CB or SBP to enable CB or SBP to verify that the Client is in conformance with all its obligations to CB and SBP.
- j. The Client destroys the original CB-issued certificate, and any copies (electronic or printed) in its possession or control, upon withdrawal or termination of its certificate.
- k. The Client authorises the CB and/or SBP to use and process any information relating to the Client, or otherwise provided by or through the Client, including but not limited to any Supply Base Report (SBR); Public Summary Reports (PSR); data required by SBP for GHG calculations and regulatory reporting; any data required by SBP to be supplied to the Client's purchaser/customer with each Transaction Batch of biomass supplied or sold.
- l. The Client entitles and authorises both the CB and SBP to process the Client's personal data and business data (so far as is necessary for the purpose of performance obligations to CB and/or SBP) in accordance with legislation regarding the processing of personal data and on the free movement of such data, and any other applicable data protection legislation.

3 Resource Requirements

- 3.1** The CB shall employ, or have access to, sufficient human and technical resources to manage all certification activities necessary to consistently meet requirements of this Standard, including prescribed timelines, and provide prompt and effective service for all Clients.
- 3.2** The CB shall require auditors and technical experts to sign a written agreement by which they commit themselves to comply with applicable policies and implement processes as defined by the CB and SBP. The agreement shall address aspects relating to confidentiality and impartiality and shall require the auditors and technical experts to notify the CB of any existing or prior relationship with any Organisation they may be assigned to evaluate.
- 3.3** The CB shall ensure, and be able to demonstrate that, personnel have appropriate competencies relevant to their assigned certification activities (such as application review, auditing, granting of certification, monitoring of auditors).
- 3.4** The CB shall identify training needs and shall offer or provide access to specific training to ensure its auditors, technical experts and other personnel involved in certification activities are competent for the functions they perform.
- 3.5** The CB shall ensure that each person involved clearly understands their duties, responsibilities and authorities.

4 Auditors

Qualification

- 4.1** The CB shall ensure that auditors are qualified and maintain their qualification for conducting evaluations according to at least one of the following:
- a. Except in the cases mentioned in b., for evaluations against SBP Standards 1 and 2, and related documents: FSC Forest Management, or any PEFC endorsed Forest Management standard;
 - b. FSC or PEFC endorsed CoC standards, for all other SBP Standards and in the following cases where the:
 - BP only sells SBP-controlled biomass;
 - EU RED Level A risk assessment for the BP's Supply Base has rated all indicators as low risk;
 - SBP Regional Risk Assessment for the BP's Supply Base rated all indicators as low risk;
 - BP only sources Processing Residues feedstock with a claim from an SBP-recognised certification scheme (i.e., FSC or PEFC).

- 4.2** For qualification to evaluate conformance against SBP Standards 1 and 2, and related documents, auditors and quality reviewers shall have a:
- a. tertiary education in a relevant discipline (e.g., forest or other natural resource management, and/or labour/social issues) and three (3) years of professional experience relevant to the scope of the evaluation, or;
 - b. secondary education in a relevant discipline (e.g., forest and/or other natural resource management, and/or labour/social issues) and five (5) years of professional experience relevant to the scope of the evaluation and to their role (e.g., legislation, regulations or other forest certification standards).

Note to 4.2 a and 4.2 b: Auditors shall be qualified for specific geographical scopes they have experience for. See clause 6.4 for requirements related to composition of evaluation teams to ensure their overall geographical qualification.

- 4.3** For qualification to evaluate conformance against SBP Standard 6, auditors and quality reviewers shall have a minimum of two (2) years experience in biomass or biofuel life-cycle assessment calculation of energy and carbon balances and be knowledgeable of the methodology relevant to the scope of the evaluation.

- 4.4** Auditors shall be registered by the CB in the SBP Audit Portal.

- 4.5** For maintaining their qualification, the CB shall ensure that the auditor has performed a minimum of three (3) SBP external audits in the previous 12 months. This refers to evaluations of any type in any country.

Training

- 4.6** The CB shall ensure that auditors and quality reviewers have successfully passed the initial auditor training course(s) approved by SBP.

- 4.7** The CB shall ensure that active auditors and quality reviewers have successfully passed any SBP-approved auditor training courses required to maintain competence (e.g., following an SBP Standard revision).

- 4.8** The CB shall ensure that active auditors and quality reviewers maintain their competence regarding SBP interpretations, CB procedures and best audit practice through regular training events.

Selection and authorisation

- 4.9** The CB shall have processes for selecting, training, and formally authorising auditors, and for selecting technical experts used in certification activities. The initial competence evaluation of an auditor shall include assessment of their ability to apply required knowledge and skills during evaluations, as determined by a competent evaluator observing the auditor conducting an evaluation.

4.10 The CB shall ensure that auditors (and, where needed, technical experts) are knowledgeable of its evaluation processes, certification requirements and other relevant requirements. The CB shall give auditors and technical experts access to an up-to-date set of documented procedures giving evaluation instructions and all relevant information on the certification activities.

4.11 The CB shall ensure that the group or individual that makes the decision on granting, refusing, maintaining, renewing, suspending, restoring, or withdrawing certification, or on expanding or reducing the scope of certification, understands the applicable Standard(s) and certification requirements, and has demonstrated competence to evaluate the outcomes of the evaluation processes including related recommendations of the evaluation team.

Performance evaluation

4.12 The CB shall ensure the satisfactory performance of all personnel involved in the evaluation and other certification activities. There shall be a documented process for monitoring competence and performance of all persons involved.

4.13 The CB shall monitor each auditor considering each scope the auditor is deemed competent for (i.e., for all SBP Standards, or only for a sub-set of these). The documented monitoring process for auditors shall include a combination of on-site evaluation, review of evaluation reports and feedback from Clients or from the market.

Note: This monitoring should be designed in such a way as to minimise disturbance to the normal processes of certification, especially from the Client's viewpoint.

4.14 The CB shall periodically evaluate the performance of each auditor on-site at an evaluation relevant to the scope of their authorisation. The frequency of on-site evaluations shall be based on need determined from all monitoring information available but shall not exceed three (3) years.

Note: On-site evaluations can be combined with witness audits for other certification schemes if the scope is relevant for evaluating their performance for their full scope of SBP evaluation authorisation.

5 Subcontracting

5.1 The CB shall have a process which describes the conditions under which subcontracting to another organisation, to provide part of the certification activities on behalf of the CB, may take place.

5.2 The CB shall have a legally enforceable agreement for the arrangement(s) it has with each body that provides subcontracted services, which shall include at minimum confidentiality requirements and the identification and avoidance of conflicts of interests.

- 5.2.1** The legally enforceable agreement shall include that the subcontracted organisation shall:
- a. not make any claims which imply that it is accredited,
 - b. describe their services as being 'in association with' [name of CB],
 - c. include a link to the CB's website on its website (where available).

5.3 The CB shall not subcontract key activities. Key activities include: policy formulation and approval, process and/or procedure development and approval, initial assessment of competence, and approval of technical personnel and subcontractors, control of the monitoring process of competence of personnel and subcontractors and its outcomes, contract review including technical review of applications and determining the technical requirements for certification activity in new technical areas or areas of limited sporadic activity, decision on certification including technical review of evaluation tasks.

5.4 The CB shall have a process for the approval and monitoring of all bodies that provide subcontracted services used for certification activities and shall ensure that records of the competence of all personnel involved in certification activities are maintained.

Note: Where the CB engages individuals or employees of other organisations to provide additional resources or expertise, these individuals do not constitute subcontracting provided they are individually contracted to operate under the CB's management system.

6 Planning evaluations

6.1 The CB shall provide Applicants with all the necessary information on the certification process and the SBP certification requirements.

6.2 When receiving an application for certification, the CB shall obtain all the necessary information to plan and conduct the certification process in accordance with applicable SBP certification requirements.

6.3 Prior to the evaluation, the CB shall inform the Applicant of the applicable normative requirements and that the SBP certificate can only be issued if the Instruction Document EU RED is included in the scope of the audit.

6.4 The Applicant shall be evaluated against the applicable requirements specified in the SBP normative documents.

6.5 The CB shall classify the activity of the Certificate Holders as Biomass Producers, Traders or End-Users. The CB shall classify the Certificate Holder as End-Users if they ultimately consume SBP-certified biomass, regardless of whether Standard 6 is included in their scope. If the End-User also engages in trade activities, these shall be recorded as secondary activities, with the End-User remaining the primary Certificate Type classification.

Evaluation team selection and assignments

6.6 The CB shall have a process for selecting and appointing an evaluation team, including an evaluation team leader and technical expert(s) as necessary, considering the competence needed to achieve the objectives of the evaluation and requirements for impartiality. The process shall follow the relevant requirements of ISO 19011.

6.7 The CB shall ensure that the evaluation team undertaking an evaluation against any SBP Standard has the combined necessary knowledge and experience to evaluate the Client against the applicable Standard(s), for the given scope of the evaluation and/or certificate and the geographical location, including the following:

- a. For evaluating against SBP Standards 1 and 2: knowledge and experience in land use criteria, such as ecology, natural science, forestry, silviculture, social science or similar.
- b. For evaluating against SBP Standard 6: knowledge and experience in GHG criteria (GHG emissions calculation at the End-user level), including demonstrated experience in life-cycle assessment, and specific experience in evaluating GHG emissions calculations following the calculation methodologies which are accepted by the relevant regulatory authorities (e.g., REDIII or any other requirements from European member states), and relevant experience depending on the type of evaluations to be conducted by the individual auditor.
- c. For evaluating against SBP Standard 4: knowledge and experience in CoC criteria: Experience in mass balance, supply chain logistics, bookkeeping, traceability, data handling or similar.

6.8 The CB shall ensure that the evaluation team undertaking an evaluation against SBP Standards 1 and 2, and/or related documents has the combined necessary knowledge and experience to evaluate the local context of the Supply Base, including:

- knowledge of ecological and social values associated with the SB;
- knowledge of applicable laws and regulations;
- knowledge of business management practices;
- knowledge of operation of suppliers, including management systems and products;
- knowledge of the local forest resource; and
- language skills appropriate to all stakeholders.

6.9 The CB shall ensure that, for evaluations against SBP Standards 1 and 2, and/or related documents, the evaluation team includes a team member with a minimum of three (3) years' full-time experience in the forestry sector in the Supply Base region. In case of on-site visits, the local expert shall join the on-site visits.

6.10 If there is only one auditor, they shall have the totality of the competences identified by the CB for the evaluation.

6.11 In deciding the size and composition of the evaluation team, the CB shall consider evaluation objectives, scope, criteria and estimated evaluation time, and the overall competence of the evaluation team needed to achieve the objectives of the evaluation as per 7.1 – 7.11.

6.12 The necessary knowledge and skills of the evaluation team leader and auditors may be supplemented by technical experts, translators and interpreters who shall operate under the direction of an auditor. A technical expert shall not act as an auditor in the evaluation team. The technical experts shall be accompanied by an auditor.

Note: Technical experts are particularly useful for providing geographical competence. The criteria for the selection of technical experts are determined on a case-by-case basis by the needs of the evaluation team and the scope of the evaluation.

Determining evaluation time

6.13 The CB shall have documented procedures for determining evaluation time. For each Client the CB shall determine the time needed to accomplish a complete and effective evaluation of the Client's entire scope of certification.

6.14 In determining the evaluation time, the CB shall consider at least the following:

- the requirements of the relevant SBP Standard(s) (e.g., how many SBP Standards and Instructions Documents apply),
- complexity of the Client and its management system,
- technological context (e.g., producing chips vs pellets),
- any subcontracting of any activities included in the scope of the management system,
- the results of any prior evaluations,
- size and number of sites, and their geographical locations,
- the risks associated with the products, processes or activities of the Organisation.

Note: Time spent travelling to and from audited sites shall not be included in the calculation of the duration of the evaluation time.

6.15 The on-site duration of an evaluation of a Biomass Producer (BP) shall depend on:

- the applicability of SBP Standard 1;
- the area and diversity of the Supply Base for which a Supply Base Evaluation (SBE) has been carried out;
- the existence of an SBP-endorsed Regional Risk Assessment (RRA);
- the results of the SBE (i.e., number of Indicators evaluated as specified risk);
- the type of feedstock (primary, processing residues and/or post-consumer);
- the number of Forest Management Units (FMU) and/or active suppliers in the BP's supply chain; and
- the number of Risk Management Measures (RMM) and where these are enforced (e.g., at mill gate, in the FMU).

6.16 The duration of an evaluation of a BP shall be a minimum of eight (8) auditing hours, and of a Trader shall be a minimum of four (4) auditing hours, not including time spent travelling between audited sites.

6.16.1 In case the duration of an evaluation of a BP is less than eight (8) hours, the CB shall justify this reduction.

6.17 The evaluation duration shall be sufficient to evaluate the effectiveness of any Risk Management Measures (RMM) that have been defined, in conformance with the sampling requirements defined below.

6.18 The CB shall ensure that planning for evaluations against multiple certification schemes (e.g., SBP, FSC, PEFC), and/or for different legal entities under common ownership, includes sufficient evaluation time to provide confidence in the certification decision for each certification scheme and/or each entity.

Note: The same evidence may be relevant for more than one certification scheme or legal entity.

Sampling

6.19 If the evaluation includes assessment against multiple certification schemes, or assessment of different legal entities under common ownership that are being evaluated simultaneously, the evaluation planning shall ensure sufficient time on-site for evaluation of each legal entity and each system's requirements to provide confidence in the SBP certification.

Note 1: Although the same evidence may be relevant for more than one legal entity (e.g., the SBE is identical for all legal entities), planning shall ensure adequate on-site evaluation to provide confidence in the certification decision for each legal entity.

6.20 The CB shall consider logistics sites as temporary sites, and thus these sites do not need to be included in the sample pool, according to the IAF MDI rules.

6.21 The CB shall consider storage sites as permanent sites, and thus these sites shall be included in the sample pool, according to the IAF MDI rules, unless the storage site has not been used in the previous year to the evaluation.

6.22 When the SBP scope includes storage, logistics and/or port facilities, the CB shall categorise the sites and, where relevant, justify the sampling methodology in the Public Summary Report.

6.23 If RMMs are implemented at the feedstock-producing level (e.g. forest) and/or supplier level, the CB must conduct its evaluation of RMMs at the corresponding level. The CB is required to calculate the sample for evaluation using the following formula:

$$Y = 0.8 \text{ SQR } X \text{ (initial and re-evaluations) or } Y = 0.6 \text{ SQR } X \text{ (surveillance evaluations)}$$

Where X = a supply unit (Forest Management Unit (FMU), farm, (TOF) suppliers, etc.) where a BP's RMM are implemented.

CB may develop a sampling methodology to use an alternative coefficient. This shall be properly justified and documented in the PSR (e.g., a large number of small forest owners).

6.24 The CB shall have a documented sampling procedure taking into account intensity, scale and risk.

7 Initial and re-evaluation evaluations

7.1 When registering new Applicants in the Audit Portal, the CB shall:

- a. request Applicants to disclose whether they are a current or previous participant of another certification scheme, and also whether they had a different legal form or name in the past 12 months;
- b. check other certification scheme certificate lists for the name of the Applicant, or former name, within the past 12 months; and

- c. perform a Customer Due Diligence/Know Your Customer check, in particular for companies with a limited trading history, to bring to the attention of SBP any Applicants seeking re-certification who were previously found to be in non-conformance with the requirement to inform SBP about participation in another certification scheme.

- 7.2** For new Applicants, the CB shall conduct an initial evaluation before issuing a certificate to the Organisation.
- 7.3** Initial evaluations shall always be conducted on-site.
- 7.4** The CB shall ensure that a full re-evaluation is conducted prior to the expiration date of the certification for any Organisation seeking to maintain their certification status beyond the expiration date.
- 7.5** The CB shall make a certification decision within 12 months from the initial evaluation, otherwise, the CB shall perform a full on-site re-evaluation.
- 7.6** For an initial evaluation, the auditor shall check the existence and set-up of key monitoring systems, and in particular the mass balance system.
- 7.7** When evaluating processing residues or post-consumer feedstock sourcing, the auditor shall check compliance with Annex 1 of Standard 2.

Stakeholder engagement verification

- 7.8** Irrespective of the presence of an SBE and for initial evaluations and re-evaluations, the CB shall provide the following information to SBP, at least one month prior to the start of the evaluation, for posting to the SBP website:
- the name(s) and location of the entity (or entities) to be assessed,
 - the scheduled date(s) of the evaluation, and
 - contact details for both the company and the CB (to facilitate comments from stakeholders to the CB).
- 7.8.1** The required information shall be provided to SBP in English, and other relevant languages where appropriate.
- 7.9** The CB shall review available stakeholder comments for evidence of conformance or potential non-conformance with relevant requirements before the evaluation takes place, in addition to other available sources of information.
- 7.10** Information gathering shall include any information provided by SBP, the Stakeholder Engagement Plan from the Client, and actively collected stakeholder comments linked to specific questions and risks identified in the SBE.
- 7.11** The results of the information gathering shall inform the evaluation topics, intensity and sample sites.

8 Non-conformances

- 8.1** The CB shall make certification decisions based on their evaluation of the Organisation's conformance with each applicable requirement, as specified in the relevant SBP certification Standard(s).
- 8.2** The CB shall record in the evaluation report or associated checklists all non-conformances with the applicable requirements of the relevant SBP Standard(s) that it identified.
- 8.3** The CB shall identify and evaluate each non-conformance to determine whether it constitutes a minor or major non-conformance.
- 8.4** The CB shall ensure that each non-conformance results in an effective corrective action.
- 8.5** The CB may identify emerging issues, which, if not addressed by the Client, may lead to future non-conformances. Such issues, when identified, shall be recorded in the evaluation report as 'opportunities for improvement' for the benefit of the Client.
- 8.6** The CB shall consider a non-conformance as major if, either alone or in combination with further non-conformances, it results in, or is likely to result in, a fundamental failure to meet the relevant requirement(s) for operation(s) within the scope of the evaluation.
- 8.6.1** Such failure may be indicated by a non-conformance which:
- continues over a long period of time,
 - is repeated or systematic,
 - affects a wide range of the production,
 - demonstrates failure of management systems ('systemic' failure),
 - threatens the integrity of the affected SBP-certified products and the credibility of the SBP trade marks, or was not corrected or adequately addressed by the responsible manager(s) after it had been identified.
- 8.7** Corrective Action Requests (CARs) shall adhere to the following timeframes:
- a. Minor non-conformances shall be corrected within one year.
 - b. Major non-conformance shall be corrected within three months.
- 8.8** In the case that action(s) to correct a major non-conformance take more than three months to complete, sufficient action shall be taken within the specified timeframe, such that new instances of non-conformance within the scope of the certification are prevented.
- 8.9** Timelines for corrective action requests shall commence from the day of the certification decision, except for major corrective action requests, which shall commence from the date when the major corrective action request was formally communicated in writing to the Certificate Holder, which shall be no later than 30 days from the day of the audit closing meeting.

- 8.10** The CB shall determine whether effective corrective action has been implemented within its timeframe.
- 8.10.1** If the action taken is not considered adequate to prevent re-occurrence/ensure conformance, then:
- a. Minor non-conformances shall be re-categorised as major non-conformances, which shall be corrected within a maximum period of three months starting from the end of the original timeline;
 - b. Major non-conformances shall lead to immediate suspension of the certificate;
 - c. Major non-conformances shall not be downgraded to minor non-conformances.
- 8.11** The CB may only issue or re-issue a certificate if all identified non-conformances (i.e., both major and minor non-conformances) are closed.
- 8.12** Five or more major non-conformances raised during a surveillance or re-evaluation will lead to immediate suspension of the certificate. In such cases, the CB shall take a decision to suspend the certificate within five calendar days starting from the first day after the closing meeting of the evaluation.
- 8.13** The CB shall consider the impact of individual non-conformances on the integrity of the affected SBP-certified products and the credibility of the SBP trade marks, when evaluating whether a non-conformance results in, or is likely to result in, a fundamental failure to meet the relevant requirement.
- 8.13.1** In case the CB concludes that a non-conformance results in, or is likely to result in, a fundamental failure the CB shall take a decision to suspend the certificate within five calendar days starting from the first day after the closing meeting of the evaluation.
- 8.14** CBs shall follow additional non-conformance and corrective action request handling procedures when specified in normative SBP documents (e.g., in SBP Framework Instruction Document EU RED: Bridging Requirements for Meeting the Renewable Energy Directive (EU/2023/2413)).
- 8.15** Where a non-conformance (NCR) is identified when auditing a Biomass Producer's Supply Base Evaluation process (Standard 2), that NCR shall be categorised as a major NCR under the following circumstances:
- a) Failure to develop a Supply Base Evaluation process;
 - b) Absence of credible and verifiable information that demonstrates the origin of feedstock;
 - c) Failure of the organisation to demonstrate that its risk assessment (CRA) has been conducted in accordance with the applicable SBP requirements;
 - d) Failure to use an SBP-endorsed Regional Risk Assessment, if such exists;
 - e) Use of feedstock originating from unevaluated sourcing areas, in other words, without the Certification Body's approval of a revised SBE scope for the organisation (new sourcing areas may only be added through a scope change audit);

- f) Failure to establish and implement control or mitigation measures; or
- g) Failure to provide information required to be made publicly available in the Supply Base Report.

9 Reporting requirements

- 9.1 The CB shall use the Audit Portal for preparing its evaluation reports.
- 9.2 The CB shall enter the evaluation closing meeting date into the Audit Portal no later than five (5) working days after the official closing meeting.
- 9.3 Public Summary Reports and updates shall be completed in the Audit Portal no later than ninety (90) days after the closing meeting of the evaluation.
- 9.4 The CB shall enter all required information in the Audit Portal and maintain it up to date as necessary.

10 Peer Review

General Requirements

- 10.1 Prior to making a certification decision, the CB shall submit the draft evaluation report to a formal peer review process, for the following evaluation scopes:
 - a. initial and re-evaluations that include CRA and/or EU RED Level B,
 - b. initial and re-evaluations that include RRA with Specified Risks and/or EU RED Level B,
 - c. any evaluation that includes the following changes: adding a sub-scope, adding RRA with Specified Risks, adding CRA, or EU RED Level B, and
 - d. any evaluation of a suspended certificate (for consideration of re-instatement of certification) that includes CRA or RRA with Specified Risks and/or EU RED Level B.

Note: A CB may apply to SBP to waive the peer review where this would not affect the quality of the evaluation or reporting, e.g., where suspension has resulted from non-payment of CB fees.
- 10.2 The peer review is to be conducted after the CB considers that a positive certification decision is warranted. As such, the peer review does not qualify as meeting the requirements of a technical review and is done in addition to and separate from that.
- 10.3 The CB shall maintain and implement documented policies and procedures for maintenance of confidentiality, including a written confidentiality agreement to be signed by all Peer Reviewers.
- 10.4 Peer Reviewers' confidentiality contracts with CBs shall not extend to providing information to SBP or the Accreditation Body; Peer Reviewers shall have the right to inform SBP and the Accreditation Body if they consider the CB has not met SBP's requirements in issuing the certificate.

Selecting and contracting a Peer Reviewer

- 10.5** The CB's evaluation report shall be reviewed by at least one (1) independent Peer Reviewer selected from the list of approved Peer Reviewers published on the SBP website.
- Note: The CB may engage additional reviewers (e.g., with specialist knowledge concerning Indigenous Peoples rights or high conservation values (HCV)) where necessary.
- 10.6** Selected Peer Reviewer shall not have been otherwise contracted by the CB during the last two (2) years.
- 10.7** The CB shall require that Peer Reviewer disclose any prior association with the Client, and be subject to the same requirements relating to conflict of interest and confidentiality as other CB personnel with influence on the certification decision.

Peer review process requirements

- 10.8** The CB shall provide the Peer Reviewer(s) with clear terms of reference, including at least the following:
- a. expected response times/timelines.
 - b. the requirement to comment explicitly on:
 - the adequacy of the field work as the basis for making a certification decision,
 - the clarity of presentation of the observations as the basis for a certification decision, and
 - whether the proposed certification decision is justified by the observations presented.
- 10.9** The Peer Reviewer may comment on any aspect of the certification decision process, including (but not limited to) resource requirements and process requirements.
- 10.10** The review shall encompass all areas of the evaluation and the certification decision processes such that the Peer Reviewer can consider the entire and complete certification decision process.
- 10.11** The CB shall provide the Peer Reviewer with all relevant information to enable them to provide adequately informed comment.
- 10.12** Upon request, the CB shall provide the Peer Reviewer with revised documentation or additional evidence as necessary to evaluate the CB's certification decision, or the CB shall provide written justification to the Peer Reviewer for declining to provide requested additional information.
- 10.13** The CB shall ensure that the Peer Reviewer has taken account of the local and national context with regards to the Supply Base, and has considered environmental, social and economic perspectives.
- 10.14** The CB shall ensure that the comments of the Peer Reviewer are attributed and documented.

- 10.15** The CB shall respond in writing to the Peer Reviewer's comments identifying what, if any, changes were made to address the comments, and provide the Peer Reviewer with a copy of its response.
- 10.16** The CB shall take a positive certification decision only after the Peer Reviewer has submitted a final report in support of the draft decision.
- 10.17** If the CB takes a diverging decision from that of the Peer Reviewer's, the CB shall record and justify the decision and include it in its evaluation report.

Note: In the event of a difference of opinion between the CB and the Peer Reviewer, SBP shall provide guidance.

Records and reporting

- 10.18** The CB shall maintain accurate and complete records including peer review comments and CB responses which shall be readily available, including for evaluation by the Accreditation Body.

11 Certification decision

- 11.1** The CB shall be responsible for, and shall retain authority for, its decisions relating to certification.
- 11.2** The CB shall assign a certification decision making entity to make the certification decision based on all information related to the evaluation, its review, and any other relevant information. The person(s) of the certification decision making entity shall not have been involved in the evaluation process.
- 11.3** The certification decision-making entity shall:
- a. have clear rules for membership, including requirements for qualification, experience and impartiality;
 - b. consist of one or more individuals, where none of these individuals have any conflicts of interest, in particular financial or other commercial interest in the outcome of the certification decision; and
 - c. not include individuals who have taken part in the evaluation as evaluation team leaders, auditors or technical experts.
- 11.4** The certification decision shall be based on the evidence presented in the evaluation report including corrective actions in response to non-conformances if any, the conclusions of the peer review and other relevant information and results related to the evaluation.
- 11.5** The person(s) of the certification decision-making entity shall be employed by, or shall be under contract with, the CB.
- 11.6** CBs shall make certification decisions no later than three months after the closing meeting of the evaluation audit.
- 11.7** The CB shall make and communicate certification decisions to the Client after the evaluation.

12 Requirements for certified Organisation certificates

12.1 The CB shall verify that the Organisation has a signed SBP Trade Mark Licence Agreement.

12.2 The CB shall provide the certified Organisation with formal certification documentation.

12.3 The formal certification documentation shall clearly convey or permit identification of the following:

- a. SBP logo;
- b. name and address of CB;
- c. CB certificate number (from the SBP approval certificate);
- d. name and address of certified Organisation;
- e. full name and version of the SBP Standards against which the certified Organisation has been assessed in the format: 'SBP Standard 1, Feedstock Compliance, Version 2.0, 10 May 2023' (as appropriate);
- f. reference to the suite of SBP documentation in the format: 'The Sustainable Biomass Program Framework of Standards can be found at: <https://sbp-cert.org/>
- g. Standards against which the CB's evaluation was conducted, including their date of publication, e.g., 'The evaluation was conducted in accordance with SBP Standard 3. Requirements for Certification Bodies, Version 2.0, 10 May 2023.';
- h. certification scope, for example, 'Production of wood pellets, for use in energy production, at [name of pellet mill] and transportation to [name of port facility].'
Also indicate any Standards which are not included in the certification scope, such as Standard 1 or Standard 5, for example, 'The scope of this certificate does not include Supply Base Evaluation/Collection and Communication of Data.';
- i. certificate number in the format: 'SBP-XX-YY', where: SBP does not change; XX - is a 2-digit number allocated to the CB by SBP; and YY- is a unique 2-digit integer specific to the Client.

Note: the CB may add additional '0' (zero) values in front of the 'XX' and 'YY' values where this facilitates integration with existing data systems;

- j. certificate version number in the format: 'XX', where: XX is a 2-digit sequential integer;
- k. date of issue of certificate;
- l. date of expiry of certificate; and
- m. CB signature, either company name or individual according to house style.

12.4 If not using the default certificate layout provided on the SBP website, the CB shall seek approval by SBP in writing before using its own certification documentation template.

12.5 Any changes made to the format or layout of the certificate template following initial approval by SBP shall be approved in writing by SBP before use by the CB.

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- 12.6** Formal certification documentation shall only be issued after the following:
- a. the decision to grant or extend the scope of certification has been made;
 - b. certification requirements have been fulfilled; and
 - c. the Client agreement has been completed/signed (per Section 2).
-
- 12.7** In the event of any changes to the certification, including changes to scope or if the CB suspends or withdraws a certificate, the CB shall ensure that SBP is informed of the changes within three (3) business days of the change in certification.
-
- 12.8** The CB shall issue a letter of notification to companies whose certificate has expired, or has been terminated, suspended or withdrawn.
- 12.8.1** The notification letter shall include:
- a. a clear statement about the invalid status of the certificate (expired, suspended, withdrawn or terminated);
 - b. the official date from which the certification becomes invalid;
 - c. the rationale for invalidating the certification which shall include, but is not limited to, an explanation for any breach of the certification agreement and the nature of the relevant non-conformance with SBP certification Standard(s) (including name, version number and date);
 - d. in case of expired certification, or certification having been terminated voluntarily, a reference to the voluntary decision of the company or the agreement between the company and the CB;
 - e. a requirement to refrain from using any and all SBP trademarks as per 2.1.i. and 2.1.h; and
 - f. a statement requiring the company to provide acknowledgment in writing of receipt of the letter of notification, its acceptance of its conditions and that it understands the invalidation of its certification.
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- 12.9** The CB shall keep records of all letters of notification sent to companies and any letters received in response.
-
- 12.10** Where a CB issues a SBP certificate to a new Client at any time after the withdrawal or termination of the Client's previous certificate with another CB, and the re-evaluation is conducted within twelve (12) months from the expiry or termination of the previous certificate, the new CB shall consider any major or minor non-conformances which had not been closed at the time of withdrawal or termination.
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- 12.11** At its sole discretion and upon request by the Client, the CB can determine whether biomass produced in conformance with applicable SBP requirements up to one month prior to an initial evaluation that resulted in a positive certification decision, is eligible or not for SBP claims.

- 12.12** The period of validity of an SBP certificate shall not exceed five (5) years. As such, a transferred certificate shall retain the same expiry date as the previous certificate unless a full re-evaluation was conducted.
- 12.13** The period of validity of an SBP-certificate may be extended for up to six (6) months to permit re-evaluation to be completed, when justified by circumstances beyond the control of the Certification Body and its client. Once the Certification Body has satisfied itself that its client will maintain its conformity with the applicable SBP requirements until the new expiry date, the Certification Body shall take the following steps:
- a. record such circumstances;
 - b. inform SBP Secretariat and provide:
 - the rationale for requesting an extension to the validity date, and
 - a new validity date (not more than 6 months beyond the original expiry date).
- SBP will review the request and if approved shall update the entry on the SBP Audit Portal. SBP will consider each extension on a case-by-case basis, and none shall be taken as forming any precedent.

13 General requirements for surveillance evaluations

- 13.1** The CB shall carry out a surveillance evaluation to monitor the Client's continued conformance with applicable certification requirements, at least annually (i.e., every 12 months). To ensure credibility of the certification, the CB shall have the contractual right to conduct additional surveillance evaluations more frequently, depending on factors such as:
- a. the scale of the operation (e.g., the area of the SB, the quantity of material manufactured, or the value and/or volume of material traded);
 - b. the intensity of resource management in the case of a Supply Base (e.g., the frequency and level of timber harvesting);
 - c. the complexity of the CoC control system;
 - d. the ecological sensitivity of the Supply Base to management intervention;
 - e. the experience and performance record of the personnel involved (e.g., managers, staff, contractors);
 - f. the number and nature of any non-conformances identified by the CB;
 - g. the number and nature of any complaints submitted by stakeholders;
 - h. changes to the Supply Base, operations, management and/or subcontractors since the previous evaluation.

13.2 The on-site element of surveillance evaluations shall be completed before the end of the anniversary month of the initial evaluation on-site closing meeting. To enable evaluation of operations across a range of seasonal variation and to maintain regular surveillance evaluations, surveillance evaluations should occur within six (6) months of this anniversary. CBs may request from the SBP Secretariat to use an alternative anniversary month for a specific Certificate Holder (CH), for example where this facilitates efficient evaluation scheduling.

13.3 Surveillance evaluations shall follow clear, documented procedures which address the elements specified in this Standard, and shall include in particular:

- a. evaluation of the Client's continued conformance with all conditions and subsequent corrective actions, on which certification is based;
- b. review of any complaints or allegations of non-conformance with any aspect of the applicable SBP Standards; and
- c. evaluation of an adequate and appropriate sample of sites and records, and interviews with a sufficient number of affected stakeholders, in order to verify that management systems (documented or undocumented) are working effectively and consistently, under the full range of conditions present in the area under evaluation.

13.4 During annual surveillance evaluations, the CB shall evaluate all SBP requirements applicable for the entire scope of its Client's certificate.

13.5 The CB shall review at a minimum:

- a. Changes to Client's certification scope,
- b. changes to the Client's management system,
- c. records of complaints and resolution procedures,
- d. training records, and
- e. use of the SBP trademarks (in transport and delivery documentation and promotional materials).

Standard 1 and/or 2 surveillance evaluations

13.6 At least four on-site surveillance evaluations shall take place before the certificate expires.

13.7 The CB shall review at a minimum:

- a. any changes to the area included in the scope of the SBE, including additions, exclusions, or Supply Base area changes;
- b. operational plan(s) for the next 12 months;
- c. feedstock supply records;
- d. records of sales of SBP-certified products (copies of invoices, bills, shipping documents);
- e. records of the Risk Assessment (RA), and monitoring carried out; and
- f. records of any RMMs and their subsequent monitoring.

13.8 The CB shall specifically assess the capacity of the Client's management system to manage any change in scope of the certificate, including any increase in the number of suppliers, and in the size, number or complexity of the SB within the scope of the certificate.

Standard 4, 5, and 6 surveillance evaluations

13.9 At least four surveillance evaluations shall take place before the certificate expires.

13.10 The auditor(s) shall visit the physical site(s) of each operation selected for evaluation to observe the applicable CoC system unless the conditions for a remote evaluation are met. (This is to verify that there has been conformance with the requirements of the specific SBP certification Standard(s) under evaluation at that site.)

13.11 The CB shall review at a minimum:

- a. any changes to the scope of the certificate, including new CoC procedures, operations, and changes in activities;
- b. inventory records;
- c. purchasing and sales documentation for feedstock and biomass (invoices, bills, transport documents, sales contracts);
- d. confirmation that inputs described as SBP-certified were covered by a valid SBP CoC certificate and supplied with the corresponding certification codes;
- e. calculations of mass balance for each product group within the scope of the certificate;
- f. a sample of records of certified outputs and use of SBP claims, and confirmation that these can be traced to eligible inputs; and
- g. sustainability characteristics of feedstock, inventories and data entered in the DTS.

13.12 The CB shall check at least the following with regards to mass balance systems:

- a. list of all inputs per site, including description of materials and details of all suppliers;
- b. list of all outputs per site, including description of materials and details of all customers;
- c. conversion factors applied (especially in the case of processing residues to ensure that the process is not being modified to produce more waste or residue material); and
- d. inputs, outputs and balances carried forward shall be in balance and shall be evaluated and checked against the bookkeeping system and the amount of physical stock available at the site.

13.13 The CB shall assign a person who is independent of the evaluation to conduct a quality review of the SBP Audit Report on Energy and Carbon Data (SAR) and grant formal approval.

Remote evaluations

13.14 Remote evaluations may be carried out, without the need for on-site visits, for operations that do not take physical possession of SBP-certified feedstock or biomass in their own or rented facilities, and do not label, alter, store or re-package the products (e.g., sales offices or agents).

Remote evaluations are only applicable for SBP Standards 4, 5 and 6 evaluations, not for evaluations of Standards 1 and 2.

13.15 The CB shall have a procedure for determining whether a surveillance evaluation against Standard 4, 5 and/or 6 is conducted remotely or conducted on-site.

Remote evaluations may have reduced duration for operations that have not produced, labelled or sold any biomass with an SBP-claim since the previous evaluation.

Waived surveillance evaluations

13.16 In case that no biomass has been produced, labelled or sold with an SBP-claim since the last evaluation, the CB may waive a surveillance evaluation.

13.17 To waive a surveillance evaluation, the CB shall require a signed declaration from the Client that no biomass has been produced, labelled or sold with an SBP-claim since the last evaluation.

- 13.17.1** The declaration shall contain a commitment by the Client to:
- a. contact the CB before commencing the production, labelling or sale of material with an SBP-claim; and
 - b. maintain their CoC system during the period in question.

13.18 The CB shall retain the contractual right to conduct a surveillance even when the Client submits a declaration described in 13.17.

- 13.19** Prior to waiving a surveillance evaluation, the CB shall:
- a. verify the information in Data Transfer System to confirm no sale of biomass with an SBP claim by the Client since the last evaluation;
 - b. inform the SBP Secretariat that the evaluation will be waived;
 - c. conduct a surveillance or re-evaluation within three (3) months from the date the Client notifies the CB that it has recommenced production, or sale of material with an SBP claim.

13.20 During the next surveillance evaluation, the CB shall review all records dating back to the previous on-site evaluation, to ensure that the CoC system has been maintained, and that no biomass has been produced, labelled or sold with an SBP claim since their last evaluation.

13.21 CBs shall not waive more than two consecutive surveillance evaluations.

14 Termination, scope revision, suspension or withdrawal of certification

- 14.1** The CB shall assign one or more persons who were independent of the evaluation to decide whether to continue, revise the scope, suspend or withdraw certification based on their review of surveillance activities.
- 14.2** If the CB suspends, terminates or withdraws a certificate, it shall promptly (and in any event within three (3) business days of the suspension, withdrawal or termination) notify SBP in writing of the same and such notification shall state the action taken and the effective date and reason for suspension, withdrawal or termination.
- 14.2.1** The CB shall include in its notification to the Client the requirement to immediately cease making SBP claims.
- 14.3** If the suspension is not lifted within 12 months, the CB shall terminate the certificate. (I.e., the period for which a suspension can be in effect shall not exceed 12 months.)
- 14.4** In the case the FSC, PEFC, or SFI certificate(s) of the Client is suspended, the CB shall determine if the suspension has an impact on SBP conformance and follow the requirements of this Standard.
- 14.5** In the event that SBP suspends or terminates the Trademark License Agreement (TMLA) with a Certificate Holder, the Certification Body shall suspend or terminate the corresponding SBP certificate issued to that Certificate Holder.

15 Complaints and appeals

- 15.1** The CB has the duty of seeking a timely resolution of complaints and appeals, in particular to:
- a. acknowledge receipt of a complaint or appeal. The SBP Secretariat shall be included in the correspondence;
 - b. provide an initial response, including an outline of the CB's proposed course of action to follow up on the complaint or appeal, within two (2) weeks of receiving a complaint or appeal;
 - c. keep the complainant(s)/ appellant(s) informed of progress in evaluating the complaint/ appeal;
 - d. investigate the allegations and specify all its proposed actions in conclusion to the complaint or appeal within three (3) months of receiving the complaint or appeal; and
 - e. notify the complainant when the complaint is considered to be closed, meaning that the CB has gathered and verified all necessary information, investigated the allegations, taken a decision on the complaint and responded to the complainant.
- 15.2** Complaints shall only be accepted where they relate directly to allegations of non-conformance with SBP requirements.

Annex 1: Certificate Transfers

General requirements of the transfer process

- 1.1** An SBP certificate cannot be transferred under the following circumstances:
- the SBP certificate is suspended;
 - all parties (new CB, previous CB, CH) are unable to agree a transfer date;
 - there are outstanding major non-conformances against the CH - these must be closed to the satisfaction of the previous CB before the transfer process may continue; or
 - relevant documentation about the CH (records, history of CARs) is not made available to the new CB.
- 1.2** A CH may request to transfer their certificate to a new CB. In such cases, the following process shall be applied:
- the CH informs their current CB that they are applying for a certificate transfer to a new CB;
 - the CH contacts the new CB and completes the application process with that CB.
- 1.3** The new CB shall request from the previous CB all relevant documentation about the CH (including history of non-conformances), including all outcomes from any Accreditation Body's surveillance assessment or compliance assessments regarding conformance of the CH to certification requirements.
- 1.4** The CH's previous CB shall send a record of non-conformances to the new CB within two (2) weeks of the request.
- 1.5** The new CB shall confirm there are no pending major non-conformances.
- 1.6** The new CB shall propose a transfer date to the previous CB and the CH, on which all rights and obligations shall be transferred. The previous CB shall not unreasonably reject the proposed transfer date.
- 1.7** The new CB shall inform SBP of all relevant information regarding the transfer, including transfer date.
- 1.8** The new CB shall conduct a transfer evaluation within three (3) months of the agreed transfer date according to the requirements for a surveillance evaluation. The evaluation shall include a review of all pending non-conformances which were issued by the previous CB.
- Note: CBs will need to terminate/create business relationships in the DTS as appropriate.
- 1.9** In case the accreditation of a CB is terminated, that CB's CHs must transfer their certificates to a CB with a valid accreditation within three months of the termination.

Status of the SBP certificate

- 1.10** The scope of the transferred SBP certificate shall be retained. Where a CH requests a revision to its scope, this shall be evaluated by the new CB in line with the relevant requirements after the date of transfer.

- 1.11** All minor non-conformances that are applicable to the previous certificate shall remain applicable to the succeeding certificate and shall be evaluated by the new CB according to the defined timelines.

Updates to the SBP website and SBP Data Transfer System (DTS)

- 1.12** The new CB shall undertake the following activities:
- a. 10 working days before the transfer date, the new CB shall submit to SBP an updated CH Information Form with the new certificate number for the transferred CH and other updates as necessary;
 - b. within three (3) days from the date of transfer the new CB shall send a copy of the new certificate to SBP; and
 - c. after the date of transfer the new CB shall check the SBP website entry to ensure it is correct and complete.

Informative:

SBP will undertake the following activities:

- a. on the date of transfer (or next available working day) the SBP website certificate information shall include the following changes, at minimum:
 - a change to the CB,
 - a change to the certificate number,
 - a reference to the previous certificate number, and.
 - a date of issue – which will be the agreed transfer date (to ensure that the five (5) year evaluation cycle is maintained).
- b. within three (3) days from the date of the transfer the DTS will be updated with the new SBP certificate number.