



Supporting Document

Stakeholder comments SBP Standard 4: Chain of Custody

April 2026

Sustainable Biomass Program

sbp-cert.org



No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
1. Management System requirements				
General requirements				
1.1	There shall be demonstrated and documented commitment from senior management for maintaining certification and meeting all applicable requirements. The commitment of the Organisation shall be made available to its personnel, suppliers and customers, and to other stakeholders upon request.	No change	There shall be demonstrated and documented commitment from senior management for maintaining certification and meeting all applicable requirements. The commitment of the Organisation shall be made available to its personnel, suppliers and customers, and to other stakeholders upon request.	N/A
1.2	The Organisation shall have all necessary infrastructure and operating procedures in place to effectively operate the Chain of Custody (CoC) system and ensure that feedstock / biomass can be tracked continuously without interruption through all internal processing steps from acquisition to transfer of material (or release for sale).	No change	The Organisation shall have all necessary infrastructure and operating procedures in place to effectively operate the Chain of Custody (CoC) system and ensure that feedstock / biomass can be tracked continuously without interruption through all internal processing steps from acquisition to transfer of material (or release for sale).	N/A
1.3	The Organisation shall appoint a management representative who has overall responsibility and authority for the Organisation's conformance with all applicable certification requirements. The management representative shall have the required qualifications (competences, knowledge and experience) and/or training and sufficient resources to be effective.	No change	The Organisation shall appoint a management representative who has overall responsibility and authority for the Organisation's conformance with all applicable certification requirements. The management representative shall have the required qualifications (competences, knowledge and experience) and/or training and sufficient resources to be effective.	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
1.4	The Organisation shall identify stakeholders, develop, implement, monitor, evaluate and adapt as necessary, a Stakeholder Engagement Plan (SEP) appropriate for their business operations and scope of certification.	Revised	The scope of the Organisation’s CoC certification shall define the product types (see ID 5E 1.2.1 Product Type nomenclature), the processes applied to these products (including subcontracting), the accounting methodology, and applicable SBP Standards.	SBP has extended the list of product types, and it is now referenced in this indicator.
Feedback 1 – Feedback 4 the same	1.4, 1.14-1.18: This belongs to standard 2. For traders, SEP seems to be overkill. A trader that buys ships from all over the world; how must he engage stakeholders, related to biomass harvesting, which is the intention here? The result seems to be a proforma statement, wasting everybody’s time. Consider moving these over to Standard 2.		SBP: Thank you for your comment and for highlighting the distinction between the responsibilities of Organisations under Standard 4 and the requirements associated with biomass harvesting under Standard 2. Indicators in Sections 1.14–1.18 are intentionally placed within Standard 4 because they relate to the Organisation’s own management system and its ability to address the Organisation’s own stakeholder concerns about its activities, rather than engagement on forest management or harvesting practices. This is a core expectation for any certified Organisation, including traders, and aligns with good practice in chain-of-custody assurance systems across sectors. To further support Certificate Holder, SBP will publish a SEP Guidance document.	
Feedback 2	There is no table under under 1.2.1 in ID5E. If it is table 3.3.3 that is being referenced, it should include forest residues without stumps as it is currently missing. If it is product group table 2.1.1 that is being referenced, then the product group definition for 2A needs to be changed as it states that the feedstock cannot originate from agricultural land.		SBP: Thank you for your comment. We acknowledge that ID5E v2.1 does not currently include a table in Section 1.2.1 that provides the Product Type nomenclature. SBP published the Product Type nomenclature as a Normative Interpretation to ensure consistent application across certificate holders. This table has now been incorporated directly into the revised version of ID5E, which will be released together with SBP Standards v2.1.	

Documented procedures

1.5	The Organisation shall maintain documented procedures (i.e., work instructions or equivalent documentation), covering all relevant requirements within the scope of the certificate and reflecting current Organisational activities. Documented procedures shall include at a minimum: <ul style="list-style-type: none"> – training, – internal audits, – record-keeping, 	No change	The Organisation shall maintain documented procedures (i.e., work instructions or equivalent documentation), covering all relevant requirements within the scope of the certificate and reflecting current Organisational activities. Documented procedures shall include at a minimum: <ul style="list-style-type: none"> – training, – internal audits, – record-keeping, 	N/A
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No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
	<ul style="list-style-type: none"> - stakeholder engagement, including management of comments and complaints, - handling non-conforming products and non-appropriate documentation, - material receipt: input/purchasing, - material accounting, - sales transactions: output/sales, - claims, - business integrity, social, and health and safety requirements, - subcontracting activities/subcontractors (where applicable), and - collection and communication of data for energy and carbon balance calculations. 		<ul style="list-style-type: none"> - stakeholder engagement, including management of comments and complaints, - handling non-conforming products and non-appropriate documentation, - material receipt: input/purchasing, - material accounting, - sales transactions: output/sales, - claims, - business integrity, social, and health and safety requirements, - subcontracting activities/subcontractors (where applicable), and - collection and communication of data for energy and carbon balance calculations. 	
1.6	Documented procedures shall be reviewed at least annually for completeness and effectiveness.	No change	Documented procedures shall be reviewed at least annually for completeness and effectiveness.	N/A
Training and qualifications				
1.7	The Organisation shall have a training plan which is reviewed at least annually to ensure its effectiveness.	No change	The Organisation shall have a training plan which is reviewed at least annually to ensure its effectiveness.	N/A
1.8	The Organisation shall provide appropriate training for personnel carrying out tasks critical to the effective implementation of applicable requirements. Training shall be specific and relevant to the task(s) performed.	No change	The Organisation shall provide appropriate training for personnel carrying out tasks critical to the effective implementation of applicable requirements. Training shall be specific and relevant to the task(s) performed.	N/A
1.9	Records of training participants and content shall be maintained.	No change	Records of training participants and content shall be maintained.	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
Internal audits				
1.10	<p>The Organisation shall conduct an internal audit, not later than 12 months after the preceding audit (internal or external) for the purpose of evaluating the Organisation’s conformance with SBP requirements, considering the size and scope of the Organisation and certificate.</p> <p>Note: An internal audit is not required to be conducted before the external initial certification audit by the CB.</p>	No change	<p>The Organisation shall conduct an internal audit, not later than 12 months after the preceding audit (internal or external) for the purpose of evaluating the Organisation’s conformance with SBP requirements, considering the size and scope of the Organisation and certificate.</p> <p>Note: An internal audit is not required to be conducted before the external initial certification audit by the CB.</p>	N/A
Feedback 3	In the EU RED BD it is not mentioned. So there is a conflict of requirements where one document requires internal audits without any condition and another have an exemption of the rule.		SBP: Thank you for your comment. SBP clarifies that, for the EU RED framework, an internal audit is not required prior to the initial certification audit. The indicator therefore remains unchanged, and the note correctly reflects this interpretation.	
1.11	<p>The Organisation shall ensure that:</p> <ul style="list-style-type: none"> a. internal audits are conducted by personnel knowledgeable of the requirements of the Standard(s); b. internal auditors do not audit their own work; c. internal audit documentation includes at minimum the scope of the internal audit; names of the internal auditor(s), date, conclusion of the evaluation of the Organisation’s conformance with SBP requirements, and any corrective actions and associated deadlines; and d. any non-conformances found during internal audits are recorded as corrective actions, and actions are taken in a timely and appropriate manner. 	No change	<p>The Organisation shall ensure that:</p> <ul style="list-style-type: none"> a. internal audits are conducted by personnel knowledgeable of the requirements of the Standard(s); b. internal auditors do not audit their own work; c. internal audit documentation includes at minimum the scope of the internal audit; names of the internal auditor(s), date, conclusion of the evaluation of the Organisation’s conformance with SBP requirements, and any corrective actions and associated deadlines; and d. any non-conformances found during internal audits are recorded as corrective actions, and actions are taken in a timely and appropriate manner. 	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
Record keeping				
1.12	<p>The Organisation shall maintain accurate, complete, up to date and accessible records and reports covering all applicable SBP requirements applicable to the certificate scope, including at least the following:</p> <ul style="list-style-type: none"> - training records, - subcontractors, - suppliers, - purchases, - determination of conversion rates, - sales, - material accounting including an annual summary, - stakeholder comments, feedback and complaints, - handling of non-conforming products, - record to support Standard 5 requirements, and - internal audit reports. <p>Note: the DTS can be referenced for available records where applicable.</p>	No change	<p>The Organisation shall maintain accurate, complete, up to date and accessible records and reports covering all applicable SBP requirements applicable to the certificate scope, including at least the following:</p> <ul style="list-style-type: none"> - training records, - subcontractors, - suppliers, - purchases, - determination of conversion rates, - sales, - material accounting including an annual summary, - stakeholder comments, feedback and complaints, - handling of non-conforming products, - record to support Standard 5 requirements, and - internal audit reports. <p>Note: the DTS can be referenced for available records where applicable.</p>	N/A
1.13	Records shall be retained for a minimum of five (5) years and comply with legal and regulatory requirements.	No change	Records shall be retained for a minimum of five (5) years and comply with legal and regulatory requirements.	N/A
Stakeholder engagement				
1.14	The Organisation shall identify stakeholders, develop, implement, monitor, evaluate and adapt as necessary, a Stakeholder Engagement	No change	The Organisation shall identify stakeholders, develop, implement, monitor, evaluate and adapt as necessary, a Stakeholder Engagement	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
	Plan (SEP) appropriate for their business operations and scope of certification.		Plan (SEP) appropriate for their business operations and scope of certification.	
Feedback 4	1.4, 1.14-1.18: This belongs to standard 2. For traders, SEP seems to be overkill. A trader that buys ships from all over the world; how must he engage stakeholders, related to biomass harvesting, which is the intention here? The result seems to be a proforma statement, wasting everybody's time. Consider moving these over to Standard 2.		<p>SBP: Thank you for your comment and for highlighting the distinction between the responsibilities of Organisations under Standard 4 and the requirements associated with biomass harvesting under Standard 2.</p> <p>Indicators in Sections 1.14–1.18 are intentionally placed within Standard 4 because they relate to the Organisation's own management system and its ability to address the Organisation's own stakeholder concerns about its activities, rather than engagement on forest management or harvesting practices. This is a core expectation for any certified Organisation, including traders, and aligns with good practice in chain-of-custody assurance systems across sectors. To further support Certificate Holder, SBP will publish a SEP Guidance document.</p>	
1.15	<p>The Organisation shall implement a documented complaint procedure, which is available upon request and part of its SEP. The procedure shall clarify that the complaints must be applicable to the scope of the Organisation's certificate, and include at least the following:</p> <ul style="list-style-type: none"> – the person(s) or position(s) responsible for managing complaints; – a timeline for confirming receipt, not to exceed 10 calendar days; – provision for reviewing the complaint, determining the appropriate actions and responding to the complainant; and – provision for monitoring the effectiveness of actions taken. 	No change	<p>The Organisation shall implement a documented complaint procedure, which is available upon request and part of its SEP. The procedure shall clarify that the complaints must be applicable to the scope of the Organisation's certificate, and include at least the following:</p> <ul style="list-style-type: none"> – the person(s) or position(s) responsible for managing complaints; – a timeline for confirming receipt, not to exceed 10 calendar days; – provision for reviewing the complaint, determining the appropriate actions and responding to the complainant; and – provision for monitoring the effectiveness of actions taken. 	N/A
1.16	Evidence of effective implementation of the SEP shall be available for verification, such as meeting notes, email communications, records of participation in regional multi-stakeholder processes, responses to comments/feedback/complaints, etc.	No change	Evidence of effective implementation of the SEP shall be available for verification, such as meeting notes, email communications, records of participation in regional multi-stakeholder processes, responses to comments/feedback/complaints, etc.	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
1.17	The SEP shall be evaluated at least every five (5) years and adapted as necessary to ensure its effectiveness.	No change	The SEP shall be evaluated at least every five (5) years and adapted as necessary to ensure its effectiveness.	N/A
1.18	The SEP shall be available upon request in a language(s) that is/are accessible for the identified affected stakeholders.	No change	The SEP shall be available upon request in a language(s) that is/are accessible for the identified affected stakeholders.	N/A
Non-conforming products				
1.19	The Organisation shall have documented procedures for identifying and ensuring that non-conforming products and/or associated claims are identified and controlled, and shall implement them as necessary.	No change	The Organisation shall have documented procedures for identifying and ensuring that non-conforming products and/or associated claims are identified and controlled, and shall implement them as necessary.	N/A
Feedback 5	Would like to add that in that case also non eligible/no SBP claim should be mentioned as you can downgrade to that as well.		<p>SBP: Thank you for your comment. We acknowledge the suggestion to explicitly reference “non-eligible/no SBP claim” as a possible outcome when managing non-conforming products or associated claims. However, we consider that the current indicator already fully covers this situation. The requirement that “non-conforming products and/or associated claims are identified and controlled” is broad and sufficiently comprehensive to include all types of non-conformities, including the downgrading of material to a non-eligible or no-claim status where appropriate.</p> <p>See Glossary, Non-conforming product: A non-conforming product is any product within the SBP Chain of Custody that fails to meet SBP requirements, and therefore must be identified, controlled, and prevented from sale or delivery with an SBP claim (with post-delivery detections triggering notification to the CB and affected direct customers, cause analysis, and corrective action).</p>	
1.20	Where non-conforming products and/or associated claims are detected after they have been delivered, the Organisation shall undertake the following activities: a. notify its CB and all affected direct customers in writing within five (5) business days of the non-conforming product claim and maintain records of that notice;	No change	Where non-conforming products and/or associated claims are detected after they have been delivered, the Organisation shall undertake the following activities: a. notify its CB and all affected direct customers in writing within five (5) business days of the non-conforming product claim and maintain records of that notice;	N/A

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	b. analysis of causes of the occurrence of non-conforming products claims, and implement measures to prevent their re-occurrence; and c. cooperate with its CB in order to allow them to confirm that appropriate actions were taken to correct the non-conformance.		b. analysis of causes of the occurrence of non-conforming products claims, and implement measures to prevent their re-occurrence; and c. cooperate with its CB in order to allow them to confirm that appropriate actions were taken to correct the non-conformance.	

Business integrity

Feedback 6	Please consider incorporating a concept similar to FSCA's Policy of Association into the Business Integrity criteria		SBP: Thank you for your suggestion which has been recorded for further analysis and might be considered in future revision.	
1.21	The Organisation shall determine and implement effective measures to comply with all applicable laws, rules and regulations in countries where it conducts business activities.	No change	The Organisation shall determine and implement effective measures to comply with all applicable laws, rules and regulations in countries where it conducts business activities.	N/A
1.22	The Organisation shall determine and implement effective arrangements against corruption proportionate to the nature and the scale of the Organisation.	No change	The Organisation shall determine and implement effective arrangements against corruption proportionate to the nature and the scale of the Organisation.	N/A
1.23	The Organisation shall implement effective Occupational Health And Safety (OHAS) measures, including at minimum: – an OHAS responsible person (representative), – OHAS procedures and processes which are appropriate to the complexity and operations of the Organisation, and – training of staff.	No change	The Organisation shall implement effective Occupational Health And Safety (OHAS) measures, including at minimum: – an OHAS responsible person (representative), – OHAS procedures and processes which are appropriate to the complexity and operations of the Organisation, and – training of staff.	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
1.24	The Organisation shall maintain an up-to-date self-assessment covering the implementation of 1.21, 1.22 and 1.23.	No change	The Organisation shall maintain an up-to-date self-assessment covering the implementation of 1.21, 1.22 and 1.23.	N/A
1.25	The Organisation shall maintain an up-to-date self-assessment and create a statement that is available to its staff in which it describes how it applies SBP Standard 1 – Feedstock Sourcing, Criterion 4.1 “Decent working conditions are provided, and labour rights are safeguarded” to its operations. Note: Level of effort required for documentation of conformance with criteria 1.21-1.25 should be proportionate to the activities and the scale of the Organisation.	No change	The Organisation shall maintain an up-to-date self-assessment and create a statement that is available to its staff in which it describes how it applies SBP Standard 1 – Feedstock Sourcing, Criterion 4.1 “Decent working conditions are provided, and labour rights are safeguarded” to its operations. Note: Level of effort required for documentation of conformance with criteria 1.21-1.25 should be proportionate to the activities and the scale of the Organisation.	N/A
Outsourcing				
1.26	In cases where an Organisation outsources activities to independent third parties, hereafter referred to as ‘subcontractors’, the Organisation shall ensure that they comply with applicable requirements of the SBP Standards within the scope of the certificate.	Revised	In cases where an organisation uses third parties, the organisation shall ensure that these third parties follow the Organisation’s documented procedures to the extent necessary to ensure compliance with all applicable SBP Standard requirements within the scope of the certificate.	Clarification on the procedure needed when outsourcing.
Feedback 7	Please clarify what activities are considered "sub-contracting".		SBP: Thank you for your comment and suggestion. Further clarification on the scope of “outsourcing”, including illustrative examples of typical arrangements (e.g. purchase, processing, storage, labelling, invoicing), will be provided in the SBP Guidance. Please also refer to the existing definition of “subcontractor” in the Glossary.	
Feedback 8	The responsibility for compliance with SBP requirements ultimately lies with the certificate holder. Therefore, we see no justification for increasing the bureaucratic documentation burden on subcontractors. Such a requirement appears disproportionate and creates an unnecessary administrative burden for both the		SBP: Thank you for your comment. We recognise the Organisation’s responsibility in establishing these procedures and ensure subcontractor compliance. To reflect this, we have revised the indicator to make the Organisation’s obligations explicit.	

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	certificate holder and external service providers, especially in cases where the subcontractor performs limited or straightforward activities.			
Feedback 9 – same as 7	<p>The limits and definition for “outsourcing” could do with further clarification. Examples of typical arrangements that are included and excluded would help. Either here or in the glossary.</p> <p>Subcontractors are not responsible for developing SBP compliant procedures. The BP must do this and ensure compliance with the subcontractors.</p>		SBP: Thank you for your comment and suggestion. Further clarification on the scope of “outsourcing”, including illustrative examples of typical arrangements (e.g. purchase, processing, storage, labelling, invoicing), will be provided in the SBP Guidance. Please also refer to the existing definition of “subcontractor” in the Glossary.	
Feedback 10 – same as 8	I do not agree that subcontractors must develop documented procedures. The organization shall ensure that subcontractors are informed/oriented and comply with the applicable requirements.		SBP: Thank you for your comment. We recognise the Organisation’s responsibility in establishing these procedures and ensure subcontractor compliance. To reflect this, we have revised the indicator to make the Organisation’s obligations explicit.	
1.27	Outsourcing shall be included in the scope of the certificate.	No change	Outsourcing shall be included in the scope of the certificate.	N/A
1.28	The Organisation shall retain legal ownership of material while in physical possession/ under control of subcontractors.	No change	The Organisation shall retain legal ownership of material while in physical possession/ under control of subcontractors.	N/A
1.29	A signed and enforceable agreement shall exist between Organisation and subcontractors.	No change	A signed and enforceable agreement shall exist between Organisation and subcontractors.	N/A
1.30	The agreement shall be established prior to the actual starting of the outsourced activities.	No change	The agreement shall be established prior to the actual starting of the outsourced activities.	N/A
1.31	<p>The agreement shall include at minimum:</p> <ul style="list-style-type: none"> – Name, business identity, and contact details of the subcontractor, outsourced activities; – Confirmation of the subcontractor that the subcontractor shall: – comply with the relevant requirements of the SBP Standards within the scope of the certificate; 	No change	<p>The agreement shall include at minimum:</p> <ul style="list-style-type: none"> – Name, business identity, and contact details of the subcontractor, outsourced activities; – Confirmation of the subcontractor that the subcontractor shall: – comply with the relevant requirements of the SBP Standards within the scope of the certificate; 	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
	<ul style="list-style-type: none"> - not make unauthorised claims and use of SBP trademarks; - not further outsource the activities; - allow the CB to audit the subcontractor; and - allow access of the CB to the subcontractor's operations, systems, documents and records as deemed necessary by CB. 		<ul style="list-style-type: none"> - not make unauthorised claims and use of SBP trademarks; - not further outsource the activities; - allow the CB to audit the subcontractor; and - allow access of the CB to the subcontractor's operations, systems, documents and records as deemed necessary by CB. 	
1.32	The Organisation and subcontractor shall have documented procedures for all outsourced activities.	No change	The Organisation and subcontractor shall have documented procedures for all outsourced activities.	N/A
1.33	Record of names and contact details of subcontractors with scope of activities shall be maintained and kept up to date by the Organisation.	No change	Record of names and contact details of subcontractors with scope of activities shall be maintained and kept up to date by the Organisation.	N/A

2. Feedstock Sourcing Requirements

2.1	The Organisation shall maintain up to date records about all suppliers who are supplying materials used for SBP product groups, including names, materials supplied, and certificate code where relevant.	No change	The Organisation shall maintain up to date records about all suppliers who are supplying materials used for SBP product groups, including names, materials supplied, and certificate code where relevant.	N/A
2.2	Feedstock inputs for production of SBP-certified biomass shall be categorised as follows: a. SBP-compliant: feedstock sourced in conformance with SBP Standard 1 and/or 2, and b. SBP-controlled: feedstock is sourced under an SBP-recognised controlled claim.	No change	Feedstock inputs for production of SBP-certified biomass shall be categorised as follows: a. SBP-compliant: feedstock sourced in conformance with SBP Standard 1 and/or 2, and b. SBP-controlled: feedstock is sourced under an SBP-recognised controlled claim.	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
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3. Material handling

<p>3.1</p>	<p>The Organisation shall ensure the accuracy of SBP claims made for biomass produced from a mixture of feedstock types per the table below.</p> <table border="1"> <thead> <tr> <th>Feedstock input combinations</th> <th>SBP-compliant</th> <th>SBP-controlled</th> <th>Non-eligible input</th> </tr> </thead> <tbody> <tr> <td>SBP-compliant</td> <td>SBP-compliant</td> <td>SBP-compliant and SBP-controlled (proportionate to the share of input)</td> <td>no SBP claim</td> </tr> <tr> <td>SBP-controlled</td> <td>SBP-compliant and SBP-controlled (proportionate to the share of input)</td> <td>SBP-controlled</td> <td>no SBP claim</td> </tr> <tr> <td>Non-eligible input</td> <td>no SBP claim</td> <td>no SBP claim</td> <td>no SBP claim</td> </tr> </tbody> </table>	Feedstock input combinations	SBP-compliant	SBP-controlled	Non-eligible input	SBP-compliant	SBP-compliant	SBP-compliant and SBP-controlled (proportionate to the share of input)	no SBP claim	SBP-controlled	SBP-compliant and SBP-controlled (proportionate to the share of input)	SBP-controlled	no SBP claim	Non-eligible input	no SBP claim	no SBP claim	no SBP claim	<p>Revised</p>	<p>The Organisation shall ensure the accuracy of SBP claims made for biomass produced from a mixture of feedstock types per the table below.</p> <table border="1"> <thead> <tr> <th>Feedstock input combinations</th> <th>SBP-compliant</th> <th>SBP-controlled</th> <th>Non-eligible input</th> </tr> </thead> <tbody> <tr> <td>SBP-compliant</td> <td>SBP-compliant or SBP-controlled</td> <td>SBP-compliant and SBP-controlled (proportionate to the share of input)</td> <td>no SBP claim</td> </tr> <tr> <td>SBP-controlled</td> <td>SBP-compliant and SBP-controlled (proportionate to the share of input)</td> <td>SBP-controlled</td> <td>no SBP claim</td> </tr> <tr> <td>Non-eligible input</td> <td>no SBP claim</td> <td>no SBP claim</td> <td>no SBP claim</td> </tr> </tbody> </table>	Feedstock input combinations	SBP-compliant	SBP-controlled	Non-eligible input	SBP-compliant	SBP-compliant or SBP-controlled	SBP-compliant and SBP-controlled (proportionate to the share of input)	no SBP claim	SBP-controlled	SBP-compliant and SBP-controlled (proportionate to the share of input)	SBP-controlled	no SBP claim	Non-eligible input	no SBP claim	no SBP claim	no SBP claim	<p>Including downgrading option for the SBP claim, allowing SBP-compliant to become SBP-controlled.</p>
Feedstock input combinations	SBP-compliant	SBP-controlled	Non-eligible input																																	
SBP-compliant	SBP-compliant	SBP-compliant and SBP-controlled (proportionate to the share of input)	no SBP claim																																	
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Non-eligible input	no SBP claim	no SBP claim	no SBP claim																																	
<p>Feedback 11</p>	<p>Table 3.1 needs correcting to say "SBP controlled + CRA/SBE/RRR (risk mitigation measures)" implemented to be considered as SBP-compliant.</p>	<p>SBP: Thank you for your comment and for highlighting the relationship between feedstock type, risk mitigation (CRA/SBE/RRR), and the resulting SBP claim.</p> <p>Table 3.1 is intended to only cross-reference the eligible SBP claims that may be made with biomass produced from mixed feedstock inputs. Its purpose is limited to identifying which output claims ("SBP-compliant", "SBP-controlled", or "no SBP claim") may be applied, depending on the combination of inputs.</p> <p>The table does not restate or redefine the underlying sustainability requirements for SBP-compliant feedstock. These requirements—including the completion of CRA/SBE/RRR and the implementation of any necessary risk-mitigation measures—are already specified in Standard 2 and are assessed before the feedstock is categorised as SBP-compliant or SBP-controlled.</p> <p>Because the table serves only as a claim eligibility matrix, adding references to CRA/SBE/RRR processes within it would conflate claim-eligibility rules with risk-assessment requirements and could reduce clarity.</p> <p>For these reasons, SBP considers the current structure of Table 3.1 appropriate and has not incorporated the proposed change.</p>																																		

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Feedback 12	The intention to include this option is understood; however, from an implementation and auditing perspective, this introduces an additional layer of interpretation. The possibility to downgrade claims already appears to be addressed under Indicator 3.5, and it is therefore not fully clear why this mechanism needs to be explicitly reflected here as well.		<p>SBP: Thank you for your comment and for highlighting the relationship between Indicator 3.5 and the information presented in Table 3.1.</p> <p>We acknowledge that Indicator 3.5 already establishes the possibility of downgrading SBP-compliant biomass to SBP-controlled. The reference included within Table 3.1 is not intended to introduce an additional requirement or interpretation. Rather, it is included to ensure alignment and consistency between the indicator text and the claim-eligibility table, which is frequently used by Certificate Holders and Certification Bodies as a quick reference tool during implementation and auditing. Reflecting the downgrading option directly in the table helps to eliminate ambiguity and ensures that users reading the table in isolation can apply the correct interpretation of claim logic, consistent with Indicator 3.5.</p> <p>For this reason, the reference to downgrading appears in both places for clarity and user-friendliness, without altering the intent or requirements established under Indicator 3.5.</p>	
3.2	In cases where there is a risk of mixing SBP-compliant and/or SBP-controlled feedstock with non-eligible input, the Organisation shall segregate the SBP-certified feedstock physically and/or temporally to maintain eligibility for an SBP claim.	No change	In cases where there is a risk of mixing SBP-compliant and/or SBP-controlled feedstock with non-eligible input, the Organisation shall segregate the SBP-certified feedstock physically and/or temporally to maintain eligibility for an SBP claim.	N/A
3.3	SBP-certified biomass (SBP-compliant or SBP-controlled) shall not be mixed with non-SBP-certified woody biomass at any point after the biomass production (e.g., by Traders at the wood pellet storage facilities). Mixing of SBP-compliant and/or SBP-controlled biomass with woody biomass that is not SBP-certified (e.g., physically mixing of SBP-compliant and FSC-certified biomass in a harbour storage) shall result in losing the SBP claim for the whole mix.	No change	SBP-certified biomass (SBP-compliant or SBP-controlled) shall not be mixed with non-SBP-certified woody biomass at any point after the biomass production (e.g., by Traders at the wood pellet storage facilities). Mixing of SBP-compliant and/or SBP-controlled biomass with woody biomass that is not SBP-certified (e.g., physically mixing of SBP-compliant and FSC certified biomass in a harbour storage) shall result in losing SBP claim for the whole mix.	N/A
3.4	SBP-compliant and/or SBP-controlled biomass may be mixed with non-woody biomass. In this case the amount of SBP-certified biomass shall be proportionate to eligible input.	No change	SBP-compliant and/or SBP-controlled biomass may be mixed with non-woody biomass. In this case the amount of SBP-certified biomass shall be proportionate to eligible input.	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
3.5		New	Where a non-woody component is used for technical purpose (e.g., binder or additive) and it is less than 2% of the total weight of the biomass, then this may be included in the SBP claim. The non-woody component shall not be of fossil origin.	
3.6	SBP-compliant biomass may be downgraded to SBP-controlled.	No change	SBP-compliant biomass may be downgraded to SBP-controlled.	N/A
Feedback 13	Perhaps it is obvious that it may be downgraded to non-certified as well. It would not harm to write it.		SBP: Thank you for your comment. While the wording of Indicator 3.5 could be expanded to explicitly mention downgrading to non-certified biomass, SBP considers that the current formulation is sufficiently clear. Further expansion is likely to create confusion for Certificate Holders and Certification Bodies, therefore no change to the indicator has been made.	

4. Traceability Requirements

Input / purchasing				
4.1	The SBP-certified Organisation shall ensure that all transactions of material included in its SBP product group schedule can be traced at least one step upstream and one step downstream from itself, and that all material is accounted for whilst under its legal ownership.	No change	The SBP-certified Organisation shall ensure that all transactions of material included in its SBP product group schedule can be traced at least one step upstream and one step downstream from itself, and that all material is accounted for whilst under its legal ownership.	N/A
4.2	The Organisation shall ensure that the following minimum information is provided by the supplier in relation to the product received: a. a unique identification number for the document, b. date the document(s) is(are) issued, c. name and address of the buyer, d. name and address of the seller,	No change	The Organisation shall ensure that the following minimum information is provided by the supplier in relation to the product received: a. a unique identification number for the document, b. date the document(s) is(are) issued, c. name and address of the buyer, d. name and address of the seller,	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
	e. CoC certificate code and claim of the seller, if relevant, f. loading or shipment delivery date, g. description of product, h. quantity of product delivered, and i. reference to any related transport documentation.		e. CoC certificate code and claim of the seller, if relevant, f. loading or shipment delivery date, g. description of product, h. quantity of product delivered, and i. reference to any related transport documentation.	
4.3	The Organisation shall be responsible for verifying conformance of all feedstock categories with all relevant SBP requirements, including the requirements specific to sourcing.	No change	The Organisation shall be responsible for verifying conformance of all feedstock categories with all relevant SBP requirements, including the requirements specific to sourcing.	N/A
4.4	When receiving biomass with an SBP claim the Organisation shall ensure that documentation exchanged between itself and the seller, in particular reference sales and delivery documentation, includes a number which enables the delivery to be linked to the corresponding transaction in the DTS.	No change	When receiving biomass with an SBP claim the Organisation shall ensure that documentation exchanged between itself and the seller, in particular reference sales and delivery documentation, includes a number which enables the delivery to be linked to the corresponding transaction in the DTS.	N/A
Material accounting				
4.5	The Organisation shall ensure that the quantity of physical inputs and outputs are tracked and documented and that only eligible inputs are used in products sold with an SBP claim and within the scope of the certificate.	No change	The Organisation shall ensure that the quantity of physical inputs and outputs are tracked and documented and that only eligible inputs are used in products sold with an SBP claim and within the scope of the certificate.	N/A
4.6	The Organisation shall have a justified and consistent methodology for calculating conversion factors, based on the actual output of a specific product group, and shall keep its conversion factor up-to-date.	No change	The Organisation shall have a justified and consistent methodology for calculating conversion factors, based on the actual output of a specific product group, and shall keep its conversion factor up-to-date.	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
4.7	Organisations that are certified to additional certification schemes and that have inputs and outputs that simultaneously carry claims from these schemes shall demonstrate that the quantities of inputs/outputs are not counted multiple times.	No change	Organisations that are certified to additional certification schemes and that have inputs and outputs that simultaneously carry claims from these schemes shall demonstrate that the quantities of inputs/outputs are not counted multiple times.	N/A
4.8	Organisations not using a mass balance system shall keep feedstock and/or biomass with different material statuses physically separate and identifiable at all stages of the production and trading process.	No change	Organisations not using a mass balance system shall keep feedstock and/or biomass with different material statuses physically separate and identifiable at all stages of the production and trading process.	N/A
4.9	An Organisation trading biomass without physical possession and without mixing shall not utilise mass balance material accounting.	No change	An Organisation trading biomass without physical possession and without mixing shall not utilise mass balance material accounting.	N/A
Mass balance system				
4.10	<p>For Organisations opting to use a mass balance system for material accounting, the Organisation shall set up and maintain a mass balance account to which additions and deductions of eligible input for a single physical site shall be recorded.</p> <p>Note 1: A mass balance system allows consignments of feedstock or biomass with differing sustainability and greenhouse gas emissions savings characteristics to be mixed for instance in a container, processing or logistical facility, transmission and distribution infrastructure or site.</p> <p>Note 2: Site is a single functional unit of an Organisation situated at one physical location, which is geographically distinct from other units of the same Organisation. An Organisation's units with distinct</p>	Revised	<p>For Organisations opting to use a mass balance system for material accounting, the Organisation shall set up and maintain a mass balance account to which additions and deductions of eligible input for a single physical site shall be recorded.</p> <p>Note: A mass balance system allows consignments of feedstock or biomass with differing sustainability and greenhouse gas emissions savings characteristics to be mixed for instance in a container, processing or logistical facility, transmission and distribution infrastructure or site.</p>	Note 2 (definition of site) moved to the Glossary.

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
	<p>physical locations may, however, be regarded as part of a site if they are an extension of it with no purchasing, processing, or sales functions of their own (e.g., a remote stockholding). A site can never include more than one legal entity. Subcontractors that are used within the terms of outsourcing agreements (e.g., outsourced warehouse) are not considered sites. Typical examples for sites are processing or trading facilities such as manufacturing sites, sales offices, or company-owned warehouse.</p>			
Feedback 14	<p>Amendments in the proposed text appears to remove the flexibility to manage mass balancing across legal entities that store feedstock in "satellite" or "adjacent storage areas. Removing the Note 2 provision for the extension of the site in the original text will cause complications when operating and auditing mass balancing systems.</p>		<p>SBP: Thank you for your comment. Amending the requirements improves the alignment of Standard 4 with the ID EU RED, which has a more restrictive definition of "site".</p> <p>ID EU RED: The mass balance system shall operate at the level of a site (geographical location, logistical facilities, transmission or distribution infrastructures with precise boundaries within which products can be mixed, e.g., pellet mill, chipping mill, harbour storage)</p> <p>Aligning the indicator and the definition remove the risk of inconsistency and confusion.</p> <p>Glossary, Site - A single functional unit of the Organisation situated at one geographical location. It includes facilities with clearly defined boundaries where activities occur and where products can be processed or mixed (e.g., pellet mill, chipping mill, harbour storage, logistical facilities, transmission or distribution infrastructure), including third-party facilities that operate on behalf of the Organisation.</p>	
4.11	<p>The Organisation shall ensure for each site that the quantity of biomass sold with SBP claims does not exceed the quantity of inputs received that qualifies for said claims, within the defined balancing period.</p>	No change	<p>The Organisation shall ensure for each site that the quantity of biomass sold with SBP claims does not exceed the quantity of inputs received that qualifies for said claims, within the defined balancing period.</p>	N/A
4.12	<p>When the Organisation is a BP, the Organisation shall categorise product type (e.g., woodchips, pellets) into product groups for the purpose of mass balancing and controlling claims. Each product group may include one or more feedstock groups. As a minimum, the BP shall create separate product groups for each product type (e.g., pellets, wood chips) and</p>	Revised	<p>When the Organisation is a BP, the Organisation shall categorise product type (e.g., woodchips, pellets) into product groups for the purpose of mass balancing and controlling claims. Each product group may include one or more feedstock groups. As a minimum, the BP shall create separate product groups for each product type (e.g., pellets, wood chips) and assign a</p>	<p>Allowing the use of 3 digits for Product Group ID, instead of just 2.</p>

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
	assign a unique 2-digit product group ID under the following feedstock classifications' rules: <ul style="list-style-type: none"> - Forest feedstock (1A) - Trees Outside the Forest (TOF) - Urban and landscape feedstock (2A) - Trees Outside the Forest (TOF) - Agricultural land feedstock (3A) - Processing residues feedstock (4A) - Post-consumer feedstock (5A) 		unique 2-digit product group ID under the following feedstock classifications' rules: <ul style="list-style-type: none"> - Forest feedstock (1A) - Trees Outside the Forest (TOF) – Urban and landscape feedstock (2A) - Trees Outside the Forest (TOF) – Agricultural land feedstock (3A) - Processing residues feedstock (4A) - Post-consumer feedstock (5A) When assigning a Product Group ID, the BP may use three digits once A=9 has been reached, e.g., 101, 102, 103 etc.	
Feedback 15	Why is Trees outside the forest mentioned twice? I do not believe agricultural feedstock can always be put under trees outside of forest. Straw and hay for example of bagasse.		SBP: Thank you for your comment. We acknowledge the observation regarding the repeated reference to Trees Outside Forest (TOF). This duplication was unintentional and resulted from a formatting error in the table columns. At this stage, SBP covers only woody biomass, not agricultural biomass. Therefore, materials such as straw, hay, or bagasse are not within the scope of the Standard. The categorisation of Trees Outside Forest is described in the Instruction Document 1A (ID1A), which defines two TOF categories at the product-group level. These categories are intended to cover woody material originating outside forest land, but they do not extend to non-woody crops.	
4.12.1	The BP might categorise product type into additional product groups based on the following voluntary characteristics: <ul style="list-style-type: none"> - Feedstock from different countries - Feedstock of different descriptions or origins (e.g., thinning, final harvest, forest residues, etc.) - Feedstock with different GHG characteristics (e.g., moisture content, transportation distance, transportation type etc.) - Feedstock with different exclusions (e.g., forestry residues without stumps) 	No change	The BP might categorise product type into additional product groups based on the following voluntary characteristics: <ul style="list-style-type: none"> - Feedstock from different countries - Feedstock of different descriptions or origins (e.g., thinning, final harvest, forest residues, etc.) - Feedstock with different GHG characteristics (e.g., moisture content, transportation distance, transportation type etc.) - Feedstock with different exclusions (e.g., forestry residues without stumps) 	N/A
4.12.2	When categorising the product type, the BP shall follow the instructions defined in the	No change	When categorising the product type, the BP shall follow the instructions defined in the Product	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
	<p>Product Group ID section of SBP Instruction Document 5E.</p> <p>Note: Feedstock data is collected in a SBP Audit Report on Energy and Carbon Data (SAR) (Section 2 Feedstock Data). In the DTS, GHG data (not GHG intensity values) is transferred through the supply chain and GHG emissions calculations are carried out in the end by biomass End-users.</p>		<p>Group ID section of SBP Instruction Document 5E.</p> <p>Note: Feedstock data is collected in a SBP Audit Report on Energy and Carbon Data (SAR) (Section 2 Feedstock Data). In the DTS, GHG data (not GHG intensity values) is transferred through the supply chain and GHG emissions calculations are carried out in the end by biomass End-users.</p>	
4.13	<p>The Organisation shall set up and maintain a separate mass balance account for each product group.</p>	Revised	<p>The Organisation shall set up and maintain separate mass balance accounts for:</p> <ol style="list-style-type: none"> product type product group SBP claim (SBP-compliant and SBP-controlled). 	<p>Clarification on when the mass balance account must be created.</p>
Feedback 16	<p>This appears to force BPs into implementing a mass for every physical product received. This would be unfeasible to manage in a mass balance system.</p> <p>As an example: Currently, we have 2 "product groups" in our SAR - "10" (Forest Feedstock) & "40" (Processing Residues). This was using the standard's required grouping elements. The example for adding physical product would be something like us now needing to have a balance for every mill & then each port identifying "10" (Logs), "11" (In-woods Chips), "40" (sawdust), "41" (shavings), "42" (chips), "43" (hog), "44" (offcuts), "45" (yard grind), etc."</p>		<p>SBP: Thank you for your comment. The requirement does not require mass balance at the level of every physical product. A clear distinction is made between Product Type and Product Groups. Mass balance is required at the Product Group level, as defined in the Glossary. While Organisations may define additional Product Groups if useful, this is optional. The existing definitions and structure ensure practical and auditable mass-balance implementation without unnecessary complexity.</p> <p>Product type: The type of biomass as defined by SBP (e.g. wood chips, wood pellets, biochar, wood briquettes).</p> <p>Product group: SBP minimum product groups:</p> <ul style="list-style-type: none"> - Forest feedstock (1A) - Trees Outside the Forest (TOF) – Urban and landscape feedstock (2A) - Trees Outside the Forest (TOF) – Agricultural land feedstock (3A) - Processing residues feedstock (4A) - Post-consumer feedstock (5A) 	
4.14	<p>The Organisation shall define a fixed balancing period and it shall not exceed 12 months.</p>	Revised	<p>The organisation shall define a fixed balancing period at the organisation level.</p> <ul style="list-style-type: none"> - For Biomass Producers using only primary feedstock (forest and TOF), the fixed balancing period shall be a maximum of 12 months. 	<p>Complete alignment with EU RED mass balance requirements</p>

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
			<ul style="list-style-type: none"> - For Biomass Producers using only processing residues or post-consumer feedstock, the fixed balancing period shall be a maximum of 3 months. - For Biomass Producers using primary feedstock and processing residues or post-consumer feedstock, the fixed balancing period shall be a maximum of 3 months. - For Biomass Traders, the fixed balancing period shall be a maximum of 3 months. 	
Feedback 17	<p>Does this mean that for a BP that mostly handles primary feedstock but also a small amount of processing residues the period for all products will be 3 months? Or can the 3 months be limited to the individual site/supply base where processing residues are handled?</p>		<p>SBP: Thank you for the comment. The Indicator has been amended for further clarification. The condition that defines the mass balancing period is set at the level of the Organisation, not at the level of a specific feedstock stream or specific site. This means that: Yes — if a Biomass Producer uses any amount of processing residues or post-consumer feedstock, the fixed balancing period for all SBP-certified products becomes 3 months.</p> <p>In other word, as soon as a Biomass Producer handles any processing residues or post-consumer feedstock at any site within the scope of certification, the organisation must use the 3-month balancing period universally, regardless of the proportion handled.</p> <p>Allowing multiple balancing periods within one certificate (e.g., 12 months for primary feedstock and 3 months for residues) is not allowed. Please refer to the relevant EU RED requirement “The appropriate period of time for achieving the mass balance shall be 12 months for producers of agricultural biomass and forest biomass and first gathering points sourcing only agricultural biomass and forest biomass, and 3 months for all other economic operators. The start and end of the period shall be aligned with the calendar year or, where applicable, the four quarters of the calendar year. As alternatives to the calendar year, economic operators may also use either the economic year that they use for bookkeeping purposes or another starting point for the mass balance period, provided that the choice is clearly indicated and applied consistently. At the end of the mass balance period, the sustainability data carried forward should be equivalent to the physical stock in the container, processing or logistical facility, transmission and distribution infrastructure or site”;</p>	
Feedback 18	<p>In addition to the 12-month period, we strongly recommend that SBP include a detailed calculation methodology for mass balancing within the standard or as a dedicated technical annex. To ensure transparency and avoid inconsistent audit interpretations, this methodology should be aligned with established industry practices, specifically the 'SURE Technical Guidance for Mass Balancing'. It is</p>		<p>SBP: Thank for your comment which will be used to improve the Guidance Document.</p>	

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
	<p>essential that the standard provides clear, formula-based instructions on how to handle:</p> <ol style="list-style-type: none"> 1. Conversion factors between different units and feedstock types; 2. Feedstock categorization when mixing certified and non-certified materials; 3. Credit transfers across different production sites or periods. Implementing a standardized calculation model, similar to the SURE-EU framework, would significantly reduce the administrative burden on producers and ensure that SBP remains technically robust and harmonized with other RED III voluntary schemes. 			
Feedback 19 – same as 17	Good to add a note similar to footnote 24 from EU RED BD: If a Biomass Producer also uses secondary or tertiary feedstock (processing residues or post-consumer feedstock) then the mass balance period for all accounts shall be maximum three (3) months.		SBP: Thank you for your comment. The indicator has been amended accordingly.	
4.15	<p>By the end of the balancing period, the account balance shall always be neutral or positive. If a negative balance occurs at the end of a balancing period, the certified company must immediately and proactively inform the CB.</p> <p>Note: In case regulatory requirements for specific markets require different mass balance requirements (e.g., REDII), and SBP provides a related ID, the requirements in the ID supersede the requirements in this Standard.</p>	Revised	By the end of the balancing period, the account balance shall always be neutral or positive. If a negative balance occurs at the end of a balancing period, the Organisation must immediately and proactively inform the CB.	REDII reference updated, “Note” removed
Feedback 20	Should this note be relevant to the entire section?		SBP: Thank you for your comment. The note has been removed to ensure full alignment of the Standard with EU RED requirements	
4.16	The transfer of sustainability characteristics shall always be accompanied by a physical transfer of material.	No change	The transfer of sustainability characteristics shall always be accompanied by a physical transfer of material.	N/A
4.17	If more than one legal entity is operating at a single site (for example at a port), each legal entity shall operate its own mass balance	No change	If more than one legal entity is operating at a single site (for example at a port), each legal	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
	system at the site covering the material that they own.		entity shall operate its own mass balance system at the site covering the material that they own.	
4.18	A positive balance may be carried over in the account (into the next fixed balancing period) up to the total corresponding amount of physical material that is in stock at the end of the balancing period.	No change	A positive balance may be carried over in the account (into the next fixed balancing period) up to the total corresponding amount of physical material that is in stock at the end of the balancing period.	N/A
4.19	The Organisation shall make available to the CB all mass balance data in advance of the planned audit.	No change	The Organisation shall make available to the CB all mass balance data in advance of the planned audit.	N/A
Output/sales				
4.20	The Organisation shall register each transaction of SBP-certified biomass in the DTS. See SBP Guidance document: Data Transfer System 2.0 User Guide for Certificate Holders.	Revised	The Organisation shall register each transaction of SBP-certified biomass in the DTS as described in the SBP Guidance document: Data Transfer System User Guide for Certificate Holders.	Enforcing the SBP Guidance document: Data Transfer System User Guide for Certificate Holders requirements.
Feedback 21	As downgrading is not defined as a transaction, downgrading events are not required to be registered or otherwise documented in the DTS. This may create an unintended gap, where downgraded SBP-compliant biomass could be sold without a claim, and later be replaced by non-compliant biomass that could then be sold as compliant based on the recorded DTS balance. Clarification on the documentation and registration requirements related to downgrading would therefore be helpful. Ideally, the DTS could be further developed to allow both transactions and downgrading events to be recorded, thereby strengthening mass balance transparency and traceability for volumes.		SBP: Thank you for your comment. The DTS Guidance already provides instructions for recording transactions related to SBP-certified biomass, including non-certified transactions. The indicator has been improved to better reflect these existing requirements and to strengthen clarity on documentation and registration within the DTS.	
4.21	The supplying site of the Organisation shall ensure that sales and delivery documentation exchanged between itself and its customer includes a unique identification number which	No change	The supplying site of the Organisation shall ensure that sales and delivery documentation exchanged between itself and its customer includes a unique identification number which	N/A

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
	<p>enables the delivery to be linked to the corresponding DTS transaction.</p> <p>Note: Each DTS transaction has a unique ID. This is to ensure, that each sales invoice or delivery document could be linked to a DTS transaction. To ensure this, each DTS transaction must include an identification number that allows linking this to the sales invoice/delivery document.</p>		<p>enables the delivery to be linked to the corresponding DTS transaction.</p> <p>Note: Each DTS transaction has a unique ID. This is to ensure, that each sales invoice or delivery document could be linked to a DTS transaction. To ensure this, each DTS transaction must include an identification number that allows linking this to the sales invoice/delivery document.</p>	
Claims				
4.22	<p>The claim 'SBP-compliant' may be used on sales transactions related to biomass, only where it refers to products which are included in the Organisation's certificate scope and that meet the eligibility requirements for SBP-complaint claims.</p>	No change	<p>The claim 'SBP-compliant' may be used on sales transactions related to biomass, only where it refers to products which are included in the Organisation's certificate scope and that meet the eligibility requirements for SBP-compliant claims.</p>	N/A
4.23	<p>The claim 'SBP-controlled' may be used on sales transactions related to biomass produced from the feedstock category conforming with SBP-controlled or SBP-compliant definitions.</p>	No change	<p>The claim 'SBP-controlled' may be used on sales transactions related to biomass produced from the feedstock category conforming with SBP-controlled or SBP-compliant definitions.</p>	N/A
Feedback 22	<p>"May" should rather be "must" or "shall", as it has been clarified that it is mandatory</p>		<p>SBP: Thank you for your comment. While transactions must be recorded in the DTS, the use of an SBP claim on sales transactions is not mandatory. The wording of the requirement correctly reflects this and no change has been made.</p>	
4.24	N/A	New	<p>When an SBP-compliant or SBP-controlled claim is used on sales transactions, the SBP EU RED-compliant claim shall also be included.</p>	<p>Clarification for using the SBP EU RED-compliant claim</p>

No.	SBP Standard 4 v2.0	Revision	SBP Standard 4 v2.1	Rationale for change
Feedback 23	Now "may" conflicts with "mandatory". Allow me to propose different wording. When an SBP-compliant or SBP-controlled claim is used on sales transactions related to biomass, the SBP EU RED-compliant claim shall also be used on the relevant sales transactions		SBP: Thank you for your comment. The indicator has been strengthened to clearly confirm the intent that, where an SBP-compliant or SBP-controlled claim is used, the SBP EU RED-compliant claim shall also be applied on the relevant sales transactions.	
4.25		New	The Organisation shall use SBP trademarks in accordance with the SBP Trade Mark Licence Agreement (TMLA) and the SBP Mark Use: Guidance for Certificate Holders, including any approval requirements set out therein.	