



Supporting Document

Stakeholder comments SBP Standard 5: Collection and Communication of Data

April 2026

Sustainable Biomass Program

sbp-cert.org



No.	SBP Standard 5 v2.0	Revision	SBP Standard 5 v2.1	Rationale for change
1. General Principles				
1.1	All data submissions shall be supported by appropriate evidence.	No change	All data submissions shall be supported by appropriate evidence.	N/A
The SBP Data Transfer System (DTS)				
1.2	The Organisation shall provide all necessary data according to this Standard to the accuracy required using the online SBP DTS, to enable GHG calculations.	No change	The Organisation shall provide all necessary data according to this Standard to the accuracy required using the online SBP DTS, to enable GHG calculations.	N/A
1.3	The Organisation shall record any changes in carbon, energy or feedstock data that occur during the period of ownership, in accordance with SBP Instruction Document 5E: Collection and Communication of Energy and Carbon Data.	No change	The Organisation shall record any changes in carbon, energy or feedstock data that occur during the period of ownership, in accordance with SBP Instruction Document 5E: Collection and Communication of Energy and Carbon Data.	N/A
Product groups and batch specific data				
1.4	The Organisation shall categorise the feedstock into one or more product groups, in accordance with Standard 4.	No change	The Organisation shall categorise the feedstock into one or more product groups, in accordance with Standard 4.	N/A
1.5	The Organisation shall provide accurate carbon and energy data, pertaining to each batch of biomass supplied, to the next legal owner in accordance with Instruction Document 5E:	No change	The Organisation shall provide accurate carbon and energy data, pertaining to each batch of biomass supplied, to the next legal owner in accordance with Instruction Document 5E:	N/A

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	Collection and Communication of Energy and Carbon Data.		Collection and Communication of Energy and Carbon Data.	
1.6	Feedstock shall retain its original characteristics as processed and characteristics shall not be transferred between transaction batches.	No change	Feedstock shall retain its original characteristics as processed and characteristics shall not be transferred between transaction batches.	N/A
2. Data Collection and Reporting Requirements				
2.1	All legal owners shall collect and record data relevant to each batch of biomass along the supply chain, including the feedstock description, energy and carbon data as defined in SBP Instruction ID 5E: Collection and Communication of Energy and Carbon Data.	No change	All legal owners shall collect and record data relevant to each batch of biomass along the supply chain, including the feedstock description, energy and carbon data as defined in SBP Instruction ID 5E: Collection and Communication of Energy and Carbon Data.	N/A
2.2	When the actual data are not available, the Organisation shall provide data with verifiable evidence from theoretical calculation provided by recognised technical expert using recognised methodology.	No change	When the actual data are not available, the Organisation shall provide data with verifiable evidence from theoretical calculation provided by recognised technical expert using recognised methodology.	N/A
2.3	Each Biomass Producer (BP) shall record the data in one of the three 'SBP Audit Report (SAR) for Energy and Carbon data' templates, where production and transportation of feedstock or biomass contributes to energy or carbon balance during the period of legal ownership by the BP.	Revised	Each BP shall record all data in the 'SBP Audit Report (SAR) for Energy and Carbon Data' (SAR) templates, where production and transportation of feedstock or biomass contribute to energy or carbon balance during the period of legal ownership by the BP. Detailed requirements are provided in Instruction Document 5E.	Reference to ID5E added for clarification.
2.3.1	BPs producing wood pellets shall complete the 'SBP Audit Report (SAR) for Energy and Carbon data for pellets'.	Removed	N/A	Indicator covered by ID5E – removed to avoid duplication

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2.3.2	<p>BPs producing only woodchips and energy logs and no other biomass with an SBP Claim shall complete one of the following templates:</p> <p>'SBP Audit Report on Energy and Carbon Data (SAR) for pellets' if both stationary chipping and thermal treatment are carried out on a separate processing site. Any specific reference to pelletisation in the document may be ignored;</p> <p>'SBP Audit Report (SAR) for Energy and Carbon Data for woodchips with stationary chipping' if only stationary chipping is carried out on a separate processing site, with or without phytosanitary treatment (see definition in section 2 of ID5E); or</p> <p>'SBP Audit Report (SAR) for Energy and Carbon Data for woodchips with mobile chipping' if there is no separate processing site with chipping or thermal treatment, other than a standard phytosanitary treatment (see definition in section 2 of ID5E).</p>	Removed	N/A	Indicator covered by ID5E – removed to avoid duplication
2.4	The Organisation shall complete an SBP Report on Energy and Carbon for Supplied Biomass (SREG) (when the transport scheme is changed during its validity period due to unforeseen reasons such as new load port, new distribution port) for supplied biomass for inland transport' when it supplies biomass using inland transport outside the scope of a Downstream Transport Route ID (DTR) or when it supplies biomass by sea transport and the relevant data is not included in the SAR.	No change	The Organisation shall complete an SBP Report on Energy and Carbon for Supplied Biomass (SREG) (when the transport scheme is changed during its validity period due to unforeseen reasons such as new load port, new distribution port) for supplied biomass for inland transport' when it supplies biomass using inland transport outside the scope of a Downstream Transport Route ID (DTR) or when it supplies biomass by sea transport and the relevant data is not included in the SAR.	N/A
2.5	The Organisation shall make all necessary data available using the DTS and using the	No change	The Organisation shall make all necessary data available using the DTS and using the templates	N/A

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	templates specified in the relevant Instruction Document. A SAR shall only be made available by the BP to other legal owners after the document has been uploaded to the DTS.		specified in the relevant Instruction Document. A SAR shall only be made available by the BP to other legal owners after the document has been uploaded to the DTS.	
2.6	The Organisation shall operate a management system to ensure that data recorded is supported by appropriate evidence and to the accuracy required to enable GHG calculations by other legal owners and the End-users.	No change	The Organisation shall operate a management system to ensure that data recorded is supported by appropriate evidence and to the accuracy required to enable GHG calculations by other legal owners and the End-users.	N/A
2.7	The Organisation shall retain records for at least five (5) years.	No change	The Organisation shall retain records for at least five (5) years.	N/A

3. Transaction Batch and associated Transaction Claim

3.1	<p>A production batch is a unit of production which is attributed with identical feedstock, energy and carbon data. Transaction batches are created by a BP. Once allocated, the feedstock, energy and carbon data of a transaction batch shall not be changed.</p> <p>Note: For example the BP may have a single production batch for each reporting period or may create separate production batches within a reporting period, in order to meet specific customer requirements.</p>	No change	<p>A production batch is a unit of production which is attributed with identical feedstock, energy and carbon data. Transaction batches are created by a BP. Once allocated, the feedstock, energy and carbon data of a transaction batch shall not be changed.</p> <p>Note: For example the BP may have a single production batch for each reporting period or may create separate production batches within a reporting period, in order to meet specific customer requirements.</p>	N/A
3.2	All transaction claims shall be recorded in the DTS. An SBP transaction claim is only valid if it is shared and accepted in the DTS.	No change	All transaction claims shall be recorded in the DTS. An SBP transaction claim is only valid if it is shared and accepted in the DTS.	N/A
Feedback 1	Suggesting that downgraded volumes are also recorded in DTS, so certified volumes are correctly tracked and avoid gaps and potential loopholes.		SBP: Thank you for your comment. To strengthen traceability and prevent gaps in mass-balance accounting, SBP has introduced a new indicator 3.2.3, which requires that when biomass is received with an SBP claim but sold	

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			without an SBP claim, the corresponding volume shall be recorded in the DTS as "Sold as non-certified." This enforces the existing DTS Guidance and ensures certified volumes are correctly tracked.	
3.2.1	N/A	New	DTS Transaction shall be registered and shared with the customer in the DTS within 30 calendar days after the actual sales date of the biomass.	Indicator moved from ID5E to Standard 5
Feedback 2	<p>Functionality not feasible for large organisations that have to use e.g. a three-month balancing period. Recommend extending to 90 days after the invoice date to accommodate for finalisation of volume data relating to transfer of fibre to plant and pellets to the port.</p> <p>For example: A company with 10 pellet mills delivering to two ports will have to estimate pellet stock that will be available at one of the two ports ahead of time before confirmation of delivery.</p> <p>If a sale is made in the 1st month of the quarter prior to finalisation of delivery the content of that sale will be estimated. If the transaction must be sent within 30 days it doesn't allow for flexibility to account for pellet production and pellet transportation disruptions at any one of the ten plants.</p>		SBP: Thank you for the detailed comment. The DTS timeline is designed for external claim visibility and chain-of-custody assurance, not for internal balancing cycles. Extending to 90 days would reduce the DTS's effectiveness in early detection of discrepancies and increase counterparty uncertainty. "Actual sales" should be interpreted in accordance with the definition of "Sales date (DTS)" = The date when the biomass was sold shall match the related invoice date, OR in case the invoice is not available at the time of creating a transaction, the date of the delivery document.	
Feedback 3	We suggest this time limit is decreased. Perhaps 10 days is more appropriate. Otherwise there is a very long time where there is no documentation of compliance.		SBP: Thank you for your comment. The 30-day timeframe was identified and agreed as an appropriate and proportionate period for registering and sharing transactions, balancing timely documentation with operational feasibility.	
3.2.2	N/A	New	DTS Transaction shall be accepted or rejected within 30 calendar days of receipt from the supplier.	Clarification to avoid long-pending transactions.
Feedback 4	Suggest consistency with recommendation above. I.e. 90 days for both acceptance and sharing of claims.		SBP: Thank you for the detailed comment. The DTS timeline is designed for external claim visibility and chain-of-custody assurance, not for internal balancing cycles. Extending to 90 days would reduce the DTS's effectiveness in early detection of discrepancies and increase counterparty uncertainty.	
Feedback 5	Addressing 'Data Dead-ends' for Non-SBP Buyers Regarding Standards 4 & 5, we highlight the 'Data Dead-end' issue: many end-consumers (e.g., heating plants) aren't SBP-registered, often utilizing SURE or REDcert instead. In v2.1, we request SBP to: 'End-of-Chain' Protocol: Formalize a methodology to 'close' DTS transactions for non-SBP buyers who still require RED III compliance data.		SBP: Thank you for your comment. SBP allows sales of SBP-certified biomass to non-certified customers. While such customers do not have access to the DTS, the DTS User Guide describes how Certificate Holders can generate an SBP Consolidated Report (PDF), which can be shared with non-SBP buyers. The validity of the transaction can be verified via the QR code included in the document.	

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	Interoperability: Ensure SBP claims and GHG data are fully transferable to the Union Database (UDB) and recognized by other schemes without requiring buyer SBP certification. Standalone SAR: Enable Sustainability Account Reports (SAR) as standalone validated documents for non-SBP buyers, ensuring GHG savings are legally recognized in national registries. Closing these gaps is critical for Producers to maintain mass balance integrity and market fluidity across the EU.		At present, and until further notice from the European Commission, EU RED III does not require biomass transactions to be recorded in the Union Database (UDB).	
Feedback 6	We suggest this time limit is decreased. Perhaps 10 days is more appropriate. Otherwise there is a very long time where there is no documentation of compliance.		SBP: Thank you for the detailed comment. The DTS timeline is designed for external claim visibility and chain-of-custody assurance, not for internal balancing cycles. Extending to 90 days would reduce the DTS's effectiveness in early detection of discrepancies and increase counterparty uncertainty.	
3.2.3	N/A	New	When biomass is received with an SBP claim but is sold without an SBP claim, the corresponding volume shall be recorded in the DTS as "Sold as non-certified."	Enforcement of SBP Guidance document: Data Transfer System User Guide for Certificate Holders requirement
Feedback 1	Suggesting that downgraded volumes are also recorded in DTS, so certified volumes are correctly tracked and avoid gaps and potential loopholes.		SBP: Thank you for your comment. To strengthen traceability and prevent gaps in mass-balance accounting, SBP has introduced a new indicator 3.2.3, which requires that when biomass is received with an SBP claim but sold without an SBP claim, the corresponding volume shall be recorded in the DTS as "Sold as non-certified." This enforces the existing DTS Guidance and ensures certified volumes are correctly tracked.	
3.3	A transaction batch may be split and supplied in more than one DTS transaction by the BP and by subsequent legal owners of the production batch.	No change	A transaction batch may be split and supplied in more than one DTS transaction by the BP and by subsequent legal owners of the production batch.	N/A
3.4	A single DTS transaction may include more than one transaction batch, including batches from more than one BP.	No change	A single DTS transaction may include more than one transaction batch, including batches from more than one BP.	N/A
3.5	A transaction claim describes the characteristics and quantities of the physical biomass associated with the transaction batch to which it relates. If the biomass is destroyed or is sold to a customer who is not a SBP Certificate Holder, the last legal owner shall mark the	No change	A transaction claim describes the characteristics and quantities of the physical biomass associated with the transaction batch to which it relates. If the biomass is destroyed or is sold to a customer who is not a SBP Certificate Holder, the last legal owner shall mark the claim as	N/A

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	claim as such in the DTS. A transaction claim may only be detached from the physical biomass to which it relates when the biomass is consumed by an End-user.		such in the DTS. A transaction claim may only be detached from the physical biomass to which it relates when the biomass is consumed by an End-user.	
3.6	Those characteristics and quantities of the physical biomass associated with the transaction claim shall be able to be traced back to the characteristics and quantities of incoming feedstock, taking into account the applicable conversion factors. Feedstock shall retain its original characteristics as processed. Characteristics shall not be transferred between transaction batches.	No change	Those characteristics and quantities of the physical biomass associated with the transaction claim shall be able to be traced back to the characteristics and quantities of incoming feedstock, taking into account the applicable conversion factors. Feedstock shall retain its original characteristics as processed. Characteristics shall not be transferred between transaction batches.	N/A
3.7	The Organisation shall be certified against Standard 4 and this Standard in order to make transaction claims.	No change	The Organisation shall be certified against Standard 4 and this Standard in order to make transaction claims.	N/A