



SBP Q&A for Standards v2.1

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The promise of good biomass





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For further information on the SBP Framework and to view the full set of documentation see www.sbp-cert.org

Document history

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Q&As: SBP Standards v2.1

Questions on the SBP Standards v2.1 submitted by stakeholders are collated below along with our answers.

We encourage you to continue to submit any questions you may have, please email info@sbp-cert.org.

The latest additions are highlighted in a box.



Benchmarking

Q: What does SBP certification achieve that cannot be achieved through existing certification schemes, such as, FSC and PEFC?

A: SBP does not intend to compete with or replicate existing certification schemes, such as, FSC and PEFC. Those schemes do not cover all the key requirements necessary to demonstrate the legality and sustainability aspects and attributes of feedstock used in biomass production and use. SBP will publish its procedure for benchmarking and recognition of other certification schemes, which will allow FSC and PEFC to be evaluated against the SBP certification scheme.

Q: How will FSC-certified material be treated under the SBP Standards v2.1?

A: The SBP procedure for benchmarking and recognition of other certification schemes will set out how other certification schemes may be benchmarked or recognised with respect to the SBP certification scheme. For example, in the case of FSC, the procedure will allow identification of any gaps between FSC and SBP requirements. Where there is a gap, and where a specified risk has been identified in the supply base, operators are required to develop and implement mitigation measures.

Q: Can the Benchmarking and Recognition Framework be used for surveillance where the Supply Base Evaluation for the main audit covered all principles and indicators (e.g. 42 indicators)?

A: Yes. If the Supply Base Evaluation (SBE) carried out for the main audit covered all applicable principles and indicators, the Benchmarking and Recognition Framework can be used for surveillance. Even if the Organisation did not apply the Framework during the main assessment, it may update its procedures and present the Benchmarking and Recognition Framework as part of the surveillance audit, subject to Certification Body review.

Q: Is SBP planning to benchmark SBP Standard1 against the new FSC Risk Framework (FSC-PRO-60-006b V2-0)?

A: Yes. SBP is planning to benchmark SBP Standard1 against the new FSC Risk Framework (FSC-PRO-60-006b V2-0). This work is being taken forward as part of SBP's ongoing alignment activities linked to the implementation of SBP v2.1. The updated v2.1 evaluations are targeted for release on 29 July, in line with the date when the v2.1 Standards become effective.



Claims

Q: Will there still be an SBP-controlled biomass claim?

A: The SBP-controlled biomass claim continues to exist. It is available to feedstock that is certified against a recognised controlled claim, for example, FSC Controlled Wood.

Q: Is biomass certified against SBP Standards v2.0 only entitled to carry the SBP claim until the end of the applicable transition period?

A: No. As long as the biomass was certified under SBP Standards v2.0 before the transition deadline, the SBP claim remains valid beyond the transition period, subject to the applicable certification requirements.

Q: Is there a difference between SBP-certified claims under v2.0 and v2.1?

A: No, there is no difference.



Chain of Custody (CoC)

Q: Could a mobile chipper use the mass balance system and mix different feedstock groups if accumulated in storage yards?

A: One condition for the mass balance system is to have a fixed site. If mixing occurs at a fixed storage site (e.g., a storage yard), it is possible to mix different feedstocks and apply the mass balance system following the requirements set out in Standard 4.

Q: In SBP Standard 4, section 4.8 what is the definition of 'material status'? What type of material needs to be kept separate?

A: Material status refers to the certification status of the material. Compliant/controlled material or material with no claim need to be segregated.



Data Transfer System (DTS)

Q: If a Certificate Holder wants to create more than nine Product Group IDs, can the system support a three-digit Product Group?

A: Yes, you can use a three-digit Product Group ID (for example, 111, 112).

Q: How should bark removed from trees at a sawmill be categorised?

A: Bark should be categorised as processing residues if the processing takes place at the sawmill.

Q: How can Certificate Holders demonstrate proof of sustainability, and when will this be available?
A: Currently SBP provides a proof of sustainability template for trading EU RED-only biomass. The process is described in SBP EU RED Bridging ID section 3. Additionally, SBP is developing a dedicated process to generate a Proof of Sustainability document for SBP-certified sales. This will provide a more standardised way to demonstrate sustainability credentials. The new Proof of Sustainability process is expected to be released in Q3 2026.
Q: With the 30-day DTS deadline for accepting or rejecting transactions, what happens if the receiver does not respond within 30 days?
A: If the receiver does not accept or reject the DTS transaction within 30 days, nothing happens to the claim—it remains pending in the system. However, Certification Bodies are expected to check the timeliness of DTS transactions during audits, and repeated delays or missing responses may be raised as an audit finding. Responsibility therefore remains with Certificate Holders to manage DTS transactions promptly and in line with the deadline.
Q: Is biomass sold to a non-certified buyer and recorded as such in DTS still considered as having an SBP claim when evidence of SBP compliance is supplied to the buyer?
A: Yes. Biomass sold to a non-certified buyer still carries the SBP claim even if sold to a non-certified buyer, provided it is recorded correctly in DTS. Evidence of the formal SBP claim may be shared with a non-certified buyer outside the DTS system, for example by email, using an extract downloaded from DTS. For details on how to download and share transaction confirmation documentation, please refer to the DTS User Guide .
Q: Does biomass sold by a Producer or Trader that does not carry an SBP claim need to be submitted in the DTS and recorded as non-certified?
A: Yes. If a Producer or Trader has an incoming balance in their DTS account and the biomass is sold without an SBP claim, the volume still needs to be reflected in DTS. In this case, the user shall record the volumes by using the "sold as non-certified" option. This ensures that the DTS inventory balances correctly reflect real-life trades.
Q: Radix has historically maintained a mass balance overview. With the introduction of SBP Standards v2.1, the removal of non-SBP re-sales (re-sales of biomass without an SBP claim) from the DTS has become mandatory. This can lead to a substantial SBP balance that is not



supported by physical product. Should these volumes be retrospectively adjusted and recorded as non-SBP sales out of Radix?

A: For v2.0 claims, non-SBP sales must be recorded retrospectively by recording volumes sold using the “sold as non-certified” option in DTS. This ensures that historical DTS balances accurately reflect real-life inventory and do not overstate available SBP material.



EU RED

Q: In situations where there is an official SBP RRA or REDIII Level A risk assessment and ALL Indicators are designated Low Risk, is a Biomass Producer required to consult with stakeholders?

A: No. The purpose of stakeholder consultation is to collect feedback on Supply Base Verifiers, Risk Ratings and the Risk Management Plan developed by the Biomass Producer (Standard 2 v2.1, Indicator 8.1). Where there is an SBP RRA or REDIII Level A risk assessment, and Low Risk designations for ALL Indicators, there is no need for further stakeholder consultation. Stakeholders may contact SBP directly if they have any comments regarding the contents or risk designations of SBP RRAs or REDIII Level A risk assessments.

Q: Which of the SBP Standards should End-users be certified against if they wish to be SBP EU RED-compliant?

A: End-users seeking compliance with SBP EU RED shall be certified against Standard 4, Standard 5 and Instruction Document EU RED. Certification against Standard 6 remains optional.

Q: Is compliance with SBP EU RED required across all SBP-certified biomass or just for biomass that is destined for a REDIII market?

A: SBP EU RED compliance is mandatory for all Certificate Holders irrespective of the market destination of the biomass they produce.

Q: Is compliance with SBP EU RED obligatory at all times?

A: Yes, compliance with the SBP EU RED requirements is mandatory for all Certificate Holders.

Q: Is the EU RED mass balance reporting period still under discussion?

A: No, the European Commission has clarified the rule for the mass balance period. Only Biomass Producers that use EXCLUSIVELY primary feedstock can use a mass balance period of up to a maximum of 12 months, others must use up to a maximum of three months. See Indicator 4.14 from SBP Standard 4 v2.1.

Q: Can the SBP EU RED-compliant claim be passed on to organisations that are not SBP Certificate Holders?

A: Yes, an SBP-certified Certificate Holder can register a DTS transaction as sold to non-SBP-certified company and extract the PDF confirmation document from the DTS to share evidence of compliance with that company via other channels (e.g., e-mail).

Q: Do the SBP Standards v2.1 incorporate the REDIII requirements, effectively doing away with the Instruction Document EU RED?

A: No, the revised SBP Standards v2.1 do not replace Instruction Document EU RED. Certificate Holders must comply with the requirements of the SBP Standards v2.1 and Instruction Document EU RED.



Q: EU RED requires that certification schemes must accept claims from other approved certification schemes. How does SBP address this?

A: SBP is required to accept EU RED claims from peer certification schemes. In SBP system we call these claims “EU RED-only” claims. When receiving biomass with an EU RED-only claim, the Organisation shall verify the current certification status of its suppliers by checking the relevant certification scheme database and shall obtain documented evidence of a formal EU RED compliance (e.g., a reference to the compliance with the sustainability criteria under the Renewable Energy Directive EU/2023/2413 in purchase invoice). Additionally, when receiving biomass as EU RED-only, the Organisation shall obtain a Proof of Sustainability (POS) document from supplying certified organisation.

Q: If a share of the feedstock used by a Biomass Producer is not EU RED-compliant, does that mean the Biomass Producer cannot be SBP-certified?

A: The Biomass Producer can be certified; however, the biomass produced from non-RED compliant feedstock cannot carry an SBP claim.

Q: If segregation of feedstock and/or biomass is ensured as per the Standards, can a Biomass Producer be SBP-certified and sell SBP/RED compliant biomass and non-certified biomass?

A: Yes.



Glossary

Q: Have the Glossary updates been aligned with EUDR definitions, particularly for “forest” and related terms?

A: Yes, to a large extent. The SBP v2.1 glossary has been updated to align key land-use and biodiversity terminology with EU policy frameworks, including EUDR. This includes clearer and more consistent definitions for forest and related terms, such as primary forest, old-growth forest, and other forest types. While SBP does not replicate EUDR legal definitions word-for-word, the alignment is intended to support a common understanding and practical application of sourcing and risk-assessment requirements.

Q: For primary and old growth forest definitions, RED largely refers to EU Member State legislation. Is this approach retained in v2.1?

A: Yes. SBP v2.1 retains the approach of recognising national or sub-national legislation for defining primary forest and old-growth forest, where such definitions exist, consistent with RED. At the same time, SBP v2.1 introduces clear, harmonised definitions and safeguards aligned with FAO concepts, ensuring a consistent baseline where national definitions are missing or less specific. This approach supports alignment with EU policy while allowing for practical and consistent application across jurisdictions.



Standards requirements

Q: Will Certification Bodies audit EUDR compliance for materials imported into the EU? Will SBP provide guidance for these audits? Can you explain in more detail the link between SBP v2.1 and EUDR?

A: No, Certification Bodies do not audit EUDR compliance, and SBP is not an EUDR certification scheme. SBP v2.1, Indicator 1.1.3 from the SBP Standard 1 is designed to be aligned with key EUDR legality concepts. However, responsibility for EUDR compliance remains with the operator placing the material on the EU market. In practice, implementing SBP standards can support EUDR due diligence, but an SBP certification does not demonstrate EUDR compliance, and Certification Bodies do not issue EUDR compliance statements. Where EUDR-related aspects are considered within an SBP audit, the focus is strictly limited to the specified risk conclusions identified under compliance with EUDR legal requirements. These relate to deforestation, forest degradation, levels of corruption, data falsification, armed conflict, applicable sanctions, and EUDR-relevant legislation, as defined under Article 2(40) of the Regulation. If any of these elements are identified as presenting a Specified Risk, the Certificate Holder is required to implement appropriate mitigation measures. In such cases, the auditor will assess conformity by reviewing evidence that demonstrates the risk has been effectively addressed. It is important to note that the EUDR-related scope within SBP audits is limited to these specific risk areas only. It does not cover other EUDR-related elements, as included in the SBP DTS EUDR Module, for example traceability requirements, geolocation data, or the communication and transmission of EUDR data.

Q: The webinar presentation mentioned that v2.1 is clearer or simpler for producers using only residues. Can you elaborate on this?

A: For producers using residues only, SBP v2.1 is clearer and simpler to apply because the requirements for residue feedstocks have been clarified, with a more explicit distinction between certified and non-certified residues. Auditor competence requirements have also been refined for residues-only supply chains, making audits more risk-proportionate and easier to apply where risks are lower.



Regional Risk Assessment (RRA)

Q: Are there plans to update the RRAs? If so, when are updates expected?

A: Yes. SBP is in the process of revising and updating all currently published Regional Risk Assessments (RRAs) to align with SBP v2.1. The updated v2.1 RRAs are targeted for release on 29 July, in line with the date when the v2.1 Standards become effective.



Trees Outside Forests (TOF)

Q: Harvest operations in a single area can often include different types of trees outside forests. Does SBP require classification according to the main type or each type?

A: It is required to subdivide for each type as per the Feedstock Group classification, especially as this has implications for mass balance reporting.



Training

Q: Will SBP provide an online training package for v2.1, similar to what was available for v2.0?

A: Yes. SBP has finalised the v2.1 training materials, following the approach used for v2.0. Updated online training resources are uploaded to the SBP Learning Management System (LMS) and shared on the [SBP YouTube](#) channel, to support Certificate Holders, Certification Bodies, and other stakeholders in applying the new requirements.



Transition to SBP Standards v2.1

Q: Should applicant Certificate Holders be certified against the revised SBP Standards v2.1?

A: From the effective date of the SBP Standards v2.1 (29 July 2026), applicant Certificate Holders can choose to become certified against them. The choice is dependent on the applicant’s own circumstances. Note that from 28 October 2027, all Certificate Holders must be compliant with the SBP Standards v2.1.

Q: When will the SBP Standards v2.1 be ready for use by Certification Bodies?

A: The SBP Standards v2.1 will be ready for use from the effective date of 29 July 2026. Certification Bodies will need to have updated their internal systems and have their updated internal systems approved by the Accreditation Body. It is recommended that Certificate Holders liaise with their Certification Body to confirm timelines.

Q: Will the SBP Audit Portal and Data Transfer System (DTS) be affected by the switch to the revised SBP Standards v2.1?

A: The Audit Portal and DTS will be updated to meet the requirements of the revised SBP Standards v2.1. During the transition period all SBP systems will cater for both v2.0 and v2.1 of the Standards.

Q: Is it possible for Organisations to have major and minor non-conformities when audited against the SBP Standards v2.1 but still be considered to have transitioned to v2.1?

A: Yes, Organisations are allowed to have major and minor non-conformances during the transition audit. To meet the transition deadline of 28 October 2027, an audit shall be completed, and a Public Summary Report (PSR) shall be uploaded to SBP website. Any non-conformances shall be closed within their respective timelines.

<p>Q: Should Certificate Holders perform an internal audit against v2.1 before their external audit?</p>
<p>A: Yes. Certificate Holders are required to include preparedness for SBP v2.1 as part of their internal audit. This helps ensure that systems, procedures, and evidence are in place and ready ahead of the external audit against v2.1 requirements.</p>
<p>Q: What is the effective date for Certification Bodies? When must CB procedures be updated?</p>
<p>A: Certification Bodies must formally update their accreditation scope to include SBP v2.1 before conducting their first audit against v2.1. This includes updating relevant procedures and documentation as part of the accreditation process. There is no separate fixed effective date for CBs; readiness is linked to accreditation scope coverage for v2.1 prior to audit delivery.</p>
<p>Q: What is the cut-off date for mandatory use of v2.1? If an annual audit takes place in June 2026, can v2.0 still be used?</p>
<p>A: Yes. SBP v2.0 may still be used throughout the transition period. For an annual audit taking place in June 2026, Certificate Holders may therefore continue to apply v2.0. However, all Certificate Holders must have their certificates upgraded to v2.1 by the end of the transition period, after which v2.1 becomes mandatory.</p>



Q: Is the move from v2.0 to v2.1 considered a scope change?
A: Yes. The transition from SBP v2.0 to v2.1 is generally considered a scope change. However, it does not automatically require additional activities such as stakeholder engagement or peer review. Whether these are needed depends on the scale and nature of the changes being implemented. Certificate Holders should refer to the relevant SBP Standard to determine when such additional requirements apply.
Q: Will the transition to v2.1 require another stakeholder consultation?
A: Not automatically. Transitioning to SBP v2.1 does not, by itself, require a new stakeholder consultation. In general, stakeholder consultation is required when there are meaningful changes to the organisation's due-diligence system. This typically applies when a Company Risk Assessment (CRA) is prepared or updated with new risk conclusions or changes to Supply Base Verifiers (SBVs), or when a Risk Management Plan (RMP) is prepared or revised in a way that introduces changes to Risk Management Measures (RMMs). Where, under Indicators 8.1 and 8.2 of SBP Standard 2, the SBE is revised without changes to CRA risk conclusions, SBVs, or RMMs, a new stakeholder consultation is not required. It is also important to note that adopting new risk conclusions from an SBP-published Regional Risk Assessment (RRA) does not trigger stakeholder consultation, as RRAs have already been subject to a formal stakeholder consultation process at regional level. In these cases, consultation is required only where the organisation develops or revises risk management measures (RMMs) based on the RRA, as this reflects supply-base-level decisions made by the organisation. This differs from the use of a CRA. Where a CRA is prepared or revised by the organisation and results in new or revised risk conclusions, SBVs, or RMMs, stakeholder consultation is required. In short, Section 8 of SBP Standard 2 is designed to ensure stakeholder involvement when something new or substantively changed is introduced into (or removed from) the organisation's due-diligence system, rather than making consultation mandatory for every version update. Where stakeholder consultation is required, it should be targeted at the stakeholders who are relevant to the specific changes or issues being addressed.
Q: Would you confirm the timeline and whether an additional audit will be required as part of the transition?
A: By the end of the transition period, 28 October 2027, all certificates must be formally updated to SBP v2.1. There is no automatic requirement for an additional audit solely for the transition. The upgrade to v2.1 can normally be addressed as part of a scheduled audit, provided the Certificate Holder is ready, and the Certification Body is accredited for v2.1.