

SBP Theory of Change v3.0: Response to consultation

Sustainable Biomass Program
sbp-cert.org



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Foreword

SBP is committed to transparency, continuous improvement and meaningful collaboration with all interested and impacted parties. Following publication of our refreshed Strategy in January 2026, we undertook a comprehensive update of our Theory of Change to ensure full alignment with SBP's strategic direction for 2026-2030. Our Theory of Change outlines the pathways through which we aim to achieve our Purpose of expanding the contribution of good biomass to the global bioeconomy.

The draft Theory of Change was subject to public consultation for a one-month period ending on 6 March 2026, providing an opportunity for interested and impacted parties to submit feedback.

We gratefully acknowledge the time and care taken by all those who reviewed the consultation draft and provided thoughtful feedback. The insights shared have strengthened the clarity and coherence of the final Theory of Change and helped refine specific sections.

This response to consultation summarises the feedback received, the actions taken and how SBP will address matters that sit outside the scope of the Theory of Change through future workstreams.

1 Introduction

This response to consultation aims to transparently address feedback received on our draft Theory of Change v3.0 during the public consultation. Our Strategy 2026-2030, Theory of Change v3.0, and forthcoming Monitoring, Evaluation and Learning (MEL) system are essential components of our impact framework, together creating a coherent, aligned and adaptive framework that supports transparency, continuous learning and responsible decision-making across the SBP certification scheme and the global bioeconomy.

This document summarises the key themes raised during the consultation and the actions taken. All stakeholder identities have been anonymised, in keeping with SBP's consultation reporting practice.

1.1 Overview of the consultation process

We launched the consultation on 3 February 2026, and it remained open until 6 March 2026. We invited feedback from all interested and impacted parties on the clarity, coherence and completeness of our updated Theory of Change.

The public consultation was a crucial step in refining our approach, allowing us to validate our assumptions and desired outcomes with those who are directly impacted by and engaged in our work. Soliciting and integrating feedback ensures that our Theory of Change is not only theoretically sound but also practically relevant and effective.

We are grateful to all stakeholders who contributed their perspectives. The feedback received was constructive, thoughtful and valuable in strengthening the final version of our Theory of Change v3.0.

2 Consultation process

2.1 Methodology

Our objective was to ensure broad and inclusive participation from all interested and impacted parties. To achieve this, we employed a multi-channel approach to outreach and engagement.

2.2 Outreach methods

Direct Mail Campaign: A targeted direct mail campaign was initiated to invite stakeholders to participate in the consultation. Invitations were sent to key individuals and organisations, encouraging them to review the draft Theory of Change and provide feedback.

Social media promotion: In addition to direct mail, we leveraged social media platforms to promote the consultation widely. This strategy helped to ensure that the consultation was visible and accessible to a wider community.

Reminder campaign: One week before the consultation's closing date, we launched a reminder campaign using both direct mail and social media. This final push aimed to maximise participation by reminding stakeholders of the impending deadline and encouraging those who had not yet responded to share their feedback.

2.3 Stakeholder engagement

The consultation sought input from a diverse group of interested and impacted parties to capture a wide range of perspectives and insights. Some 800 stakeholders were invited to participate in the consultation, including Civil Society Organisations and those organisations with a commercial interest in the biomass sector.

3 Summary of feedback

The feedback received confirmed the clarity and coherence of the strategic logic presented in our updated Theory of Change v3.0. It also welcomed the expanded scope relating to new feedstocks, new end-use sectors and strengthened data infrastructure.

There was support for the integration of MEL as a core element of system improvement. Constructive recommendations regarding duplication, the articulation of evidence use, and the future development of indicators and system documentation were received.

As a result of the feedback, we have incorporated several improvements into the final Theory of Change v3.0. Other suggestions, mainly relating to operationalisation and implementation, will be taken forward through the MEL system framework, Standards development, assurance system updates and data system enhancements. No structural changes to the causal logic of the Theory of Change were required.

4 Key themes raised during the consultation

4.1 Strengthening the relationship between the Theory of Change and the MEL system

It was suggested that the Theory of Change should explicitly reference the evidence streams that inform its refinement (for example, internal metrics, monitoring results, external research, and feedback).

We agreed that a high-level reference to the role of evidence and learning would strengthen the Theory of Change. However, detailed procedural requirements do not belong within the Theory of Change, which is a strategic causal model rather than an operational governance document.

A new sub-section, *How evidence informs our Strategy, Theory of Change and MEL system*, has been added to section 6, *Our impact framework*. This provides a clear, strategic statement of how MEL, stakeholder feedback, external analysis and other evidence sources contribute to system learning, whilst leaving procedural detail to the MEL system framework.

4.2 Removing duplication across Background, Introduction and Purpose sections

Several instances of duplication between the Background, Introduction and Purpose sections were highlighted.

We reviewed all three sections, identified overlapping content, and re-structured them to ensure each serves a distinct narrative purpose:

- The *Background* section now focuses on strategic rationale and the drivers for updating the Theory of Change.
- The *Introduction* section now provides the contextual framing for how the Theory of Change should be read.
- The *Purpose* section now presents our Purpose without repeating contextual content.

No substantive material was removed, only duplication.

4.3 Suggestions relating to KPIs, GHG indicators, dashboards and MEL responsibilities

It was proposed that:

- KPIs be included for each outcome and impact,
- SBP demonstrate explicitly how it contributes to GHG reductions,
- Aggregated data dashboards be published, and
- MEL roles and responsibilities be clarified.

All of these points relate to monitoring, indicator development, data presentation, and governance mechanics. As such, these elements fall under SBP's MEL system, not the Theory of Change. The Theory of Change intentionally does not define KPIs or operational responsibilities.

No changes were made to the Theory of Change. These suggestions will be considered and addressed in the development of the MEL system framework, GHG Calculator documentation and SBP's wider data-system improvements.

4.4 Requests for implementation-level detail, timelines, assurance implications and system capabilities

Further detail was sought on:

- Assurance processes for new feedstocks,
- How new biomass categories will be assessed,
- Implementation timelines and risk profiles,
- Capabilities and integration of digital systems (DTS, Audit Portal, GHG Calculator), and
- MEL governance and indicator development.

These matters relate to future implementation and operational procedures, which are intentionally not described in the Theory of Change. The Theory of Change provides strategic causal logic, whereas implementation details will be provided in normative documents, assurance procedures, the MEL system framework, and data system guidance.

No changes to the Theory of Change were required. All requested details will be addressed through subsequent documentation and engagement processes.

In addition, one respondent raised a broader concern regarding the extent to which Biomass Producers can influence long-term land or resource management decisions, and questioned whether sustainable biomass sourcing can be ensured without reliance on long-term land or forest management certification. The feedback suggested that recognition of existing management certification schemes should be the primary mechanism for demonstrating sustainable feedstock sourcing.

SBP acknowledges that different perspectives exist regarding the most effective mechanisms for assuring long-term sustainability outcomes. However, this feedback relates to the design and scope of certification models, rather than to the purpose of the Theory of Change itself. The Theory of Change does not claim direct control over land-use or post-harvest management decisions, but explains how SBP expects to contribute to sustainability outcomes through a risk-based, assurance-driven and learning-oriented system, consistent with SBP's Strategy 2026-2030. No changes to the Theory of Change were therefore required.

4.5 Overall outcome

The consultation confirmed strong support for the clarity and logic of the updated Theory of Change v3.0.

Where feedback related to the strategic nature of the Theory of Change, improvements were made.

Where feedback related to operationalisation, assurance processes, indicators, or technical systems, these points have been recorded and will be addressed through the MEL system framework, Standards development, assurance system updates, and data system enhancements, rather than the Theory of Change itself.

The final Theory of Change v3.0 therefore retains its role as a strategic, high level causal model, reflecting stakeholder suggestions where appropriate, avoiding procedural or operational detail, and fully aligned with SBP's Strategy 2026-2030.

By incorporating the feedback received, we have made revisions to our draft Theory of Change v3.0. These changes enhance clarity, strengthen our assumptions, and ensure a more balanced perspective that reflects the diverse views of interested and impacted parties. We believe these improvements will better support our objectives and commitments to sustainable biomass practices.

5 Conclusion

We would like to extend our thanks to all interested and impacted parties for their contributions to our updated Theory of Change v3.0. Your feedback has helped to refine our approach and ensure that our objectives are clear, our assumptions robust, and our perspectives balanced.

We encourage all interested and impacted parties to comment on the work of SBP at any time. We value ongoing dialogue and encourage continuous input to help us maintain and enhance the Standards we set for sustainable biomass practices. Reiterating our commitment to transparency and continuous improvement, we remain dedicated to working collaboratively with all interested and impacted parties to achieve our shared sustainability goals.