

Living Document



Better Certification and Regulation for Biomass

A certification scheme's perspective

Sustainable Biomass Program
sbp-cert.org

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For further information on the SBP certification scheme and to view the full set of documentation see [www.sbp-certification.com](#)

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In the case of inconsistency between translations, the official English language version shall always take precedence.

SBP welcomes comments and suggestions for changes, revisions and/or clarifications on all of its Standards documentation. Please contact [redacted]

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About SBP

SBP is a certification scheme to assure legal and sustainable woody biomass used in industrial, large-scale energy production, with the following key themes:

Governance and scope

- **Multi-stakeholder governance** underpins the certification scheme and its operation
- **SBP's scope is clearly defined** and is solely concerned with assuring legal and sustainable sourcing of biomass and the transmission of sustainability and energy data
- **SBP is aligned with leading regulatory regimes** on sustainable biomass practice
- **Standardisation** delivers fungibility and facilitates international trade

Evaluation and verification

- **Criteria and indicators** define legality and sustainability and set performance requirements
- **Evaluation and evidence** of how each of the indicators is met is directly linked to forest management and harvesting practice
- **Evaluation of all feedstock** is a requirement
- **Objective evidence** is a clear requirement in the identification and mitigation of risk; stakeholder engagement is an important and integral part of the process
- **Verification of evidence** is required in all cases

Independent scrutiny

- **Third-party independent audits** of Certificate Holders must be carried out by Certification Bodies before any claims can be made, and every 12 months thereafter to assure conformance to the SBP standards
- **Third-party independent accreditation** of Certification Bodies before they can offer SBP certification services

Transparency

- **Data collection and communication** gives complete visibility on supply chains
- **Transparency** of all Certificate Holders' reports and Certification Body audits through publication on the SBP website

Overview

SBP is an independent, not-for-profit voluntary certification scheme assuring the legality and sustainability of woody biomass used in large-scale energy production. The SBP certification scheme provides assurance that woody biomass is sourced from legal and sustainable sources and provides verified data along the entire supply chain.

With over five years' experience of operating a voluntary certification scheme for woody biomass, SBP shares its perspective on the principles that underpin a credible certification scheme and inform better regulation for biomass. This paper is a **living document**, that will be continually edited and updated as SBP explores its perspective with key stakeholders and reflects on the discussions and considerations that arise.

Today, SBP has over 300 Certificate Holders across 31 countries. In 2019, around one-quarter of biomass pellet production worldwide was SBP-certified. In the EU-28, 61% of the industrial pellets consumed in 2019 were SBP-certified.

SBP is positioning itself as the certification scheme of choice for woody biomass used in energy production – it is the only scheme that can be used to demonstrate compliance in the four key biomass markets of geographical Europe (Belgium, Denmark, the Netherlands and the UK). As such, SBP sees itself as an honest broker between policy makers/regulators and the practitioners in the woody biomass to energy sector. SBP is in the beneficial position of being able to look from one side to the other and comment on what works and what does not as policy intent is transposed from the written word of legislation and regulations through certification standards to practical implementation by practitioners in the field.

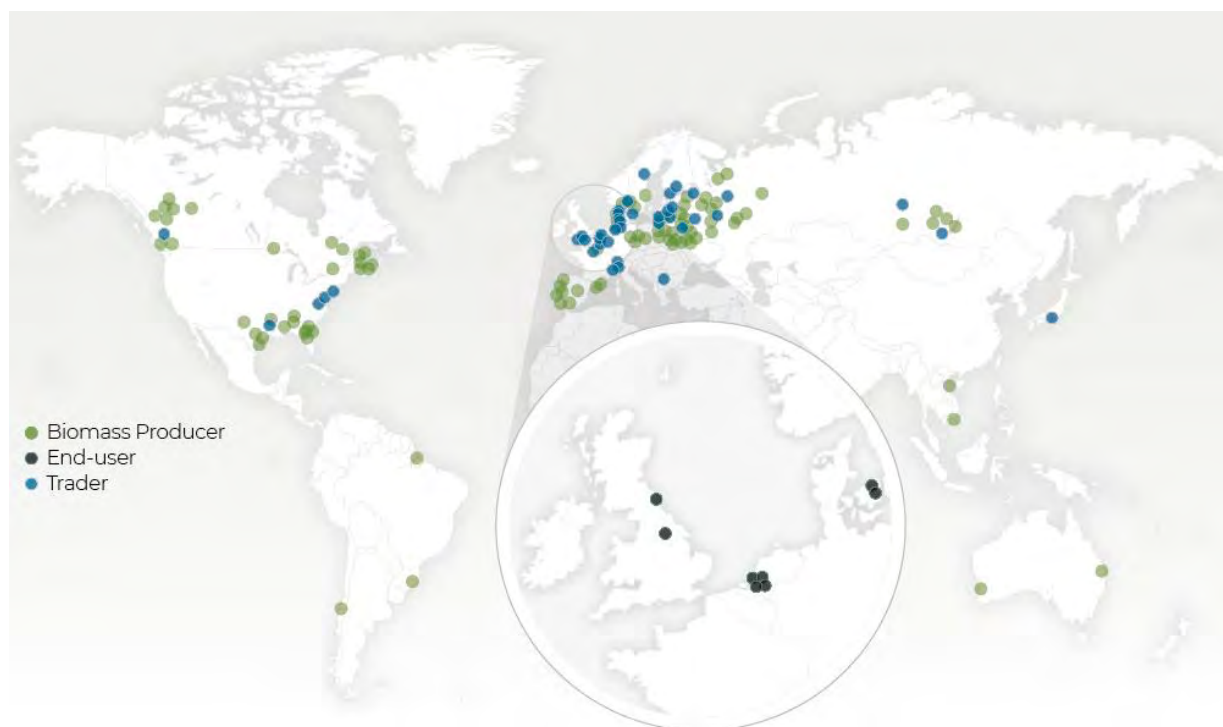


Figure 1 SBP Certificate Holders map

Introduction

Respected scientific advisory bodies and policy makers worldwide recognise biomass to energy as a renewable technology with a significant role to play in reducing carbon emissions and meeting challenging, long term climate goals. With energy policy focused on reducing carbon emissions, the uptake of renewable energy has significantly increased over recent years.

Without biomass, climate goals cannot be met. Woody biomass is a valuable resource, and as with most things in life there is good and bad, right and wrong. Only sustainably sourced biomass is good biomass and the right and only way to deliver a carbon benefit and contribute to achieving climate goals.

Over the last three decades, voluntary social and environmental certification schemes have gained in popularity as market-based mechanisms for demonstrating the sustainable and ethical sourcing and production of a range of commodities and products.

Through its credible and robust certification scheme, assuring responsible practice throughout the biomass supply chain, SBP is the promise of good biomass and is an integral part of the solution for tackling climate change. SBP not only serves the needs of supply chain actors, from producers, through traders to end-users, but equally important, serves wider society.

SBP is fit-for-purpose to demonstrate compliance with regulatory requirements. Already recognised by the competent authorities in Belgium (Flanders), Denmark, the Netherlands and the UK, SBP has applied for recognition under the re-cast EU Renewable Energy Directive (RED II). Use of a common certification scheme brings efficiency benefits and facilitates consistency across our Certificate Holder base.

This paper explores some of the lessons learned during the lifetime of SBP, both in terms of the fundamental principles that underpin a biomass certification scheme and principles that are advocated for better regulation of biomass.

Better Certification Principles

Since SBP first launched its standards in 2015, the organisation has undergone significant transformation in both its operational and governance arrangements. At the core of that transformation has been the desire to implement independence in key decision-making, such as standards-setting, accreditation and certification, and the aspiration to engage fully with the biomass sector's wide range of stakeholders.

SBP has secured a firm foothold in the international market for sustainable biomass used in industrial scale energy production. Five years on from the launch of version 1 of our standards, we embarked on a process to take stock and ensure that our standards are fit-for-purpose, not only for the markets they already serve, but as an off-the-shelf system of standards for emerging biomass markets.

Our Standards Development Process will be informed by the experience we have gained over the past five years, changes in the external environment, such as new or revised legislation, advances in best practice, and ideas and suggestions from our many stakeholders.

In this section SBP reflects on the key principles that underpin its governance and operations success and support our endeavour to be the biomass certification system of choice.

Certification Principle 1: An independent, multi-stakeholder governed organisation

- Committed to transparency in governance, standards-setting and operations
- Third-party accreditation and certification decision-making

SBP recognises the value of good governance and independent decision-making. Our governance arrangements bring together stakeholder groups representing civil society interests, biomass producer interests and those of biomass end-users. The involvement of a range of interest groups at Board and Committee level fosters dialogue, decision-making and implementation of solutions to common goals.

Through the involvement of a wide range of stakeholders, decisions have greater legitimacy and better reflect a set of perspectives rather than a narrow view.

The SBP standards were developed through consultation with stakeholders. The process of reviewing and updating the standards is built on extensive stakeholder consultation with all relevant topics and issues open for discussion. Thus, the development process will enable our standards to be revised in the light of regulatory changes and advances in thinking around key topics such as biodiversity, carbon and social safeguards.

Critical to the success of the SBP certification scheme, and specifically certification decision-making, is independent scrutiny. The use of international accreditation body, Assurance Services International, for managing our assurance program aligns us with other, well-recognised certification schemes and adds an important level of independent scrutiny to the certification decision-making process.

Certification Bodies must become accredited if they wish to offer SBP certification services. Once accredited, Certification Bodies are subject to regular assessment by our accreditation body. With accreditation in place, certification decisions are the sole responsibility of the Certification Body.

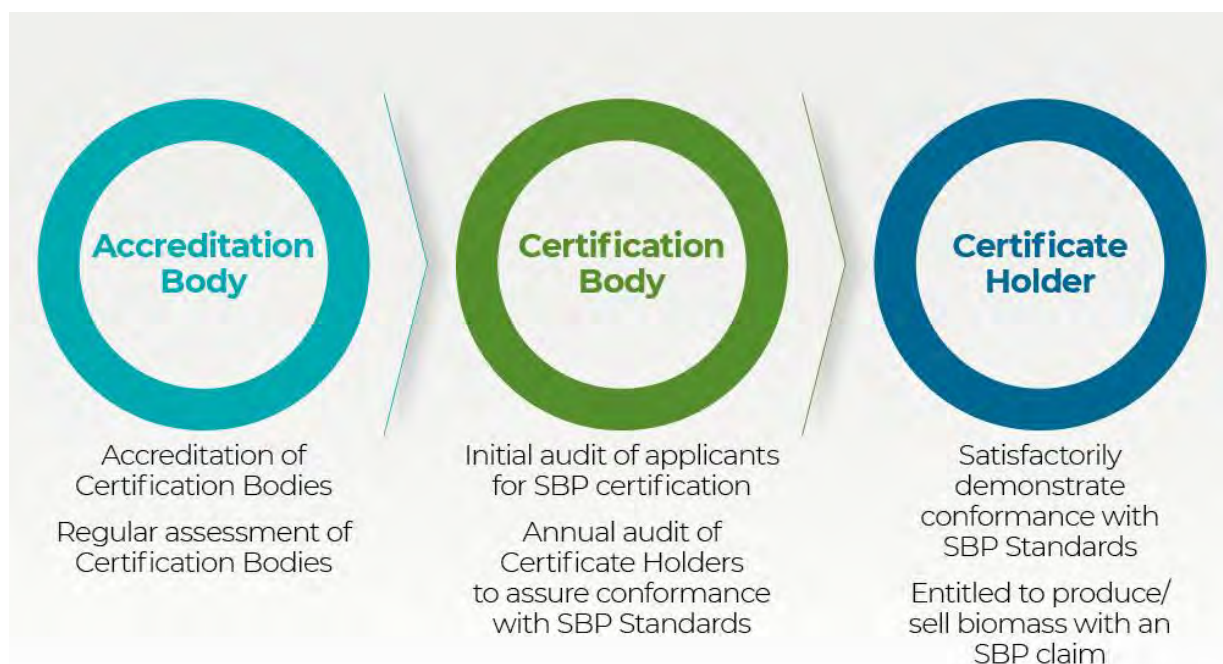


Figure 2 SBP assurance program illustrating Independent scrutiny in certification decision-making

Certification Principle 2: Robust requirements with which Certificate Holders must comply

- Standards cover biodiversity, high conservation value areas as well as social safeguards
- Standards guarantee that feedstock comes from forests managed on a sustained yield basis and does not come from converted natural forest

The SBP certification scheme is founded on the two principles of legality and sustainability. Those principles are broken down into criteria and again into indicators covering a range of requirements, including ensuring compliance with local laws, protecting biodiversity and high conservation value areas, as well as social measures and guarantees the material comes from growing forests. See Annex 1 for the full list of criteria and indicators.

The standards also cover how to evaluate the sustainability of the feedstock material, including requirements for stakeholder consultation and public reporting, how third-party Certification Bodies are to undertake verification, the requirements for chain of custody, and data transfer.

The certification scheme also includes other processes, such as those for dealing with appeals from Certificate Holders and complaints from any interested party.

Certification Principle 3: Demonstration of legally and sustainably sourced biomass

- Demonstration of compliance with voluntary and regulatory requirements
- A credible, effective and internationally-recognised biomass certification scheme

Certification schemes provide a practical approach to support the work of policy makers and regulators. For example, conformance to the SBP certification scheme enables demonstration of legal and sustainable sourcing of biomass and compliance with regulatory requirements for biomass used in energy production.

With multi-stakeholder governance, independent decision-making and robust standards, processes and procedures in place, SBP offers a credible and effective certification scheme that is globally applicable and recognised in key biomass markets.

Certification Principle 4: Data collection and communication

- Tracks biomass produced and sold with an SBP claim throughout the supply chain
- All biomass with an SBP claim is accompanied by verified sustainability and energy data

The SBP Data Transfer System (DTS) is unique in its capability to track woody biomass transactions along the supply chain, from feedstock origin to end use. As certification scheme owner, SBP has complete visibility on all biomass produced and sold with an SBP claim.

Alongside biomass seller and buyer information, tonnages of wood pellets and chips are recorded and linked to energy and carbon data allowing greenhouse gas calculations to be made.

All SBP Certificate Holders must use the DTS if they wish to attach an SBP claim to the biomass they produce and/or sell. By tracking biomass in that way, the opportunity to make fraudulent claims is reduced. We, and our assurance partners, match production volumes with sales volumes, such that sales of biomass with an SBP claim cannot exceed that produced.

If the market or regulations demand it, we pride ourselves on having the ability to adapt our system to transfer the required information throughout the supply chain.

Certification Principle 5: Facilitation of international trade

- Stimulating a market for legally and sustainably harvested low-value wood
- Common requirements to aid fungibility

SBP supports a sector that is becoming increasingly commercialised. As an internationally traded commodity, fungibility and therefore standardisation of the traded product is a fundamental requirement of a certification system. SBP is based on the application of sustainability definitions and requirements for woody biomass used in energy production across the key biomass-using countries, thereby representing a meta-standard that serves the requirements of multiple jurisdictions.

The certification system works for all supply chain actors, from producers through traders to end-users, thereby facilitating trade across international markets and improving market efficiency and liquidity.

Through facilitating trade the use of biomass is supported, which in turn helps to preserve continuous and sustainable forest management practices, such as replanting, fire prevention and thinning, and ensure forests stay as forests and are not converted to other land uses.

Better Regulation Principles

Across geographical Europe, some countries have already implemented regulatory requirements that demand biomass feedstock to be sourced responsibly, that is, both legally and sustainably. The re-cast Renewable Energy Directive (RED II) must be transposed into national law across the European Union's Member States by 30 June 2021, and with it sustainability requirements for (solid) woody biomass.

Belgium, Denmark, the Netherlands and the United Kingdom were the first movers in the consideration and implementation of sustainability criteria for (solid) woody biomass. The approaches across the four countries, however, have not been consistent and that has proved problematic at the practical level and in some cases has paved the way to unintended consequences.

In this section SBP reflects on the lessons learned from the evolving regulatory landscape that frames the biomass to energy sector and draws out key principles that, if followed, would lead to better regulation for the use of biomass for energy.

Regulation Principle 1: Harmonisation and certainty of sustainability requirements

- Strong, consistent and equivalent sustainability criteria across all markets to deliver a harmonised market and a level playing field for all market participants
- Certainty of sustainability requirements as far as possible is necessary to promote a stable market
- Facilitation of international trade in a global marketplace

Harmonised sustainability requirements are pillars of a strong and impactful policy that is understandable, transparent, implementable, auditable and focused on desired outcomes.

From a certification scheme perspective, harmonisation of sustainability requirements for biomass is desirable in terms of the efficiency and effectiveness of ensuring sustainability and it is also in the interests of delivering certainty to the biomass market. In the absence of harmonisation, an attempt at delivering a 'one size fits all' certification scheme to service all markets will risk building-in redundancy as all markets' requirements are incorporated, but some may be unnecessary for certain of the markets or even contradictory. Continual change as new markets or revised sustainability requirements emerge creates uncertainty for supply chain actors and presents implementation issues and barriers to trade.

Under REDII, Member States are able to go beyond the biomass sustainability requirements of the Directive. That leeway presents the risk that the EU will be characterised by a patchwork of sustainability requirements for biomass. The potential for biomass to be considered sustainable in one Member State but not in another will act as a barrier to trade or simply lead to market inefficiency through the establishment of sub-markets, with flows of biomass from regions with stringent criteria to regions with less stringent criteria. REDII requires the Commission to assess the impact of any such additional sustainability criteria leading to a legislative proposal for harmonisation (as appropriate by 2026). Given its overview of many markets, SBP will support the Commission in this effort.

In a global marketplace, fungibility of the biomass product is highly desirable if the supply chain is to flourish and international trade ensue. Harmonisation drives fungibility and is consistent with a competitive, market-based approach. The EU is the global leader in sustainability criteria, a position that will be reinforced by consistency and clarity of a single set of sustainability criteria.

Regulation Principle 2: A regional/landscape approach

- Less bureaucracy brings efficiency gains
- Globally applicable
- Ability to define entire sourcing area

Article 2 (30) REDII defines ‘sourcing area’, which is entirely consistent with a regional/landscape approach, as the geographically defined area from which the forest biomass feedstock is sourced, and from which reliable and independent information is available and where conditions are sufficiently homogeneous to evaluate the risk of the sustainability and legality characteristics of the forest biomass. WWF’s [Landscape Sourcing Report: Sustainable Business Using the Landscape Approach](#) makes the case for the private sector to adopt landscape approaches to sustainably strengthen and increase cost effectiveness within their supply chains.

SBP’s experience confirms that forest level determination is not practicable, nor is it necessary. Frequently, the supply base of a biomass producer is larger than a single Forest Management Unit and requires a regional or landscape sourcing level approach. A region or landscape has much wider reach and is more meaningful when implementing measures to maintain and increase biodiversity and forest carbon.

A regional level approach provides a credible degree of compliance, where this is combined with the application of risk mitigation measures dependent on the local circumstances (see Regulation Principle 3). Such an approach defines an area from which all of the feedstock that goes into making solid biomass (for example, wood pellets and chips) is sourced. As a minimum it could be the supply base of the biomass producer (for example, a wood pellet mill), but might be described by an administrative area, such as a state, province or country.

Regulation Principle 3: A risk-based approach

- Allows a deeper look into the real risks of sourcing feedstock
- Demands appropriate risk mitigation measures to be taken in accordance with the level of identified risk
- Increasing recognition and widespread use

A risk-based approach allows a deeper look into the real risks of sourcing feedstock and identifies appropriate mitigation measures in accordance with the level of risk. The approach recognises both the

importance of assuring sustainability and the need for risk mitigation to provide proof of evidence of compliance, thereby making regulatory regimes workable.

Use of a risk-based approach brings efficiency gains and it is becoming widespread, not just amongst certification schemes. The approach is inclusive, opening up market opportunities for small forest owners that may otherwise be excluded due to the cost and administrative burden of forest level certification.

SBP's risk-based approach includes requirements for biomass producers to implement management systems to mitigate risks, such as depleting carbon sinks or adverse effects on biodiversity. Such actions equal those of forest level certification in terms of providing safeguards, and prove to be more effective and traceable through placing the burden on producers (not landowners) to comply.

The use of verifiable data and leveraging existing information sources, alongside risk-based approaches, will ensure biomass used by suppliers aligns to policy objectives and ultimately delivers genuine carbon benefits.

Regulation Principle 4: Use of clear and well-understood terms and definitions

- Ensuring requirements are implementable and impactful and have global application
- Should be applied to legislation and regulations to avoid the risk of unworkable requirements that fail to deliver the policy intent

Use of clear terms and definitions that are well understood in the global forest and woody (solid) biomass industry will ensure that regulatory regimes are workable. Avoiding confusion will aid the implementation of policy measures and ensure the policy intent is met.

Detailed regulations distinguishing feedstocks based on artificial requirements, such as, type and size, are blunt instruments that will not necessarily deliver on policy. Such definitions do not contribute to conservation of biodiversity or to delivering carbon benefit; there is no discernible link between definition and sustainability characteristic.

Attempting to micro-manage a harvest on such a basis goes against market fundamentals. Market forces (for example, pricing) ensure that high value wood does not enter the biomass supply chain – the separation of low-grade wood and high-grade wood is practical and common. Only low value feedstock is used for biomass production, feedstock that would be rejected by sawmills due to disease, discolouration, shape or simply because the economics of transportation to the sawmill don't stack up.

Further, some terms that find their way into common usage can often be misleading, for example, the term 'whole tree' is a poor definition. Thinnings may be considered to be whole trees, when in reality they are instrumental in delivering the economic, social and environmental benefits of sustainable forest management.

Regulation Principle 5: Focus on desired outcomes

- Focus on results
- Avoidance of unintended consequences

Prescriptive rules written into legislation and regulations limit the ability of biomass producers to comply due to the associated administrative burden, not because sustainability criteria cannot be met. Impacts, such as the exclusion of certain feedstocks that are otherwise good and the creation of artificial market barriers, may well arise with unintended consequences. For example, requirements to demonstrate the origin of secondary feedstock (that is, processing residues) may have the unintended consequence of increasing the use of primary feedstock (which comes directly from the forest) and decreasing the use of secondary feedstock, simply because it is easier to demonstrate the origin, and hence sustainability, of primary feedstock than it is for secondary feedstock.

Focusing on desired outcomes and facilitating the delivery of those outcomes through a management system approach of 'plan, do, check and act' lends itself to delivering social, environmental and economic benefits. For example, the implementation of mitigation measures to remove the risk of non-compliant feedstock from entering into the supply chain. Thus the need for overly prescriptive requirements is avoided.

Regulation Principle 6: Comparable and transparent claims

- Claims are all-important
- Integrity of biomass volumes produced and sold
- Claims backed by verified data
- Transparency of material flows through the supply chain

In the case of the biomass sector, a biomass producer that satisfactorily demonstrates compliance with the SBP standards requirements receives a certificate. As a certificate holder, the producer is entitled to produce and sell biomass with an SBP claim, provided the feedstock meets SBP requirements and the SBP-certified management system is implemented during production of the biomass.

It is, therefore, the claim that is all-important. Neither the certificate nor scheme documentation is proof of compliance, only the claim guarantees compliant biomass. Transparent communication and understanding of the material flows through the supply chain will prevent illegal and irresponsibly harvested wood entering the biomass markets.

Regulation Principle 7: Recognition of international accreditation bodies

- An international approach for implementing sustainability
- A global risk perspective contributes to greater consistency in certification decision-making

SBP, together with other well-established certification schemes (including FSC, RSPO, RSB), uses an international accreditation body for accreditation services¹. Importantly, that allows the international character of the scheme to be accommodated and is essential to ensure the credibility of voluntary certification schemes that operate across international markets.

Through conducting hundreds of assessments of Certification Bodies each year (including witness audits, compliance audits, office audits and desk audits), international accreditation bodies amass enormously valuable know-how for specific scheme requirements. The international character of the accreditation body allows for a global risk perspective to be applied to the performance of Certification Bodies, contributing to greater consistency in their performance and ultimately more consistent certification decision-making – a must have for schemes operating across international markets.


SBP will continue to share its experiences with the Commission in order to identify best practices, thus ensuring the legality and sustainability of woody biomass used in the EU.

¹ In the case of SBP, **accreditation** is the formal recognition by an accreditation body (Assurance Services International) of the competence of a third-party certification body to work to specified standards. **Certification**, on the other hand, represents assurance by a third-party certification body of the conformity of a certificate holder's management systems to specified requirements.

Feedback Welcome

This paper is a living document. It will be continually edited and updated as SBP explores its perspective with key stakeholders and reflects on the discussions and considerations that arise.

All stakeholders are invited to submit views, comments and/or questions to build on the lessons we have learned while operating a biomass certification scheme. In helping us to develop our thinking on what makes better certification and regulation for biomass, we hope to inform the development of biomass regulation.

Please send your thoughts to: 

Annex 1: Principles, criteria and indicators

Biomass feedstock is legally sourced (Principle 1)

Criterion 1.1: The Supply Base is defined

Reference	Indicator	Guidance
1.1.1	<p>The BP Supply Base is defined and mapped.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> Geographic and other boundaries to the Supply Base are defined and justified Maps to the appropriate scale are available Key personnel demonstrate an understanding of the Supply Base 	<p>The description of the Supply Base and accompanying maps should be appropriate to its size and any variation within it. Complex supply chains may require additional definition.</p> <p>The requirement relates to feedstock included in the SBE. Certain feedstocks from outside the SB may be used in SBP certified biomass so long as they meet all requirements (see CoC Standard).</p>
1.1.2	<p>Feedstock can be traced back to the defined Supply Base.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> Feedstock inputs, including species and volumes, are consistent with the defined Supply Base Transport documentation and goods-in records are consistent with the defined Supply Base 	<p>Feedstock claimed to have originated from the Supply Base can be traced back to that Supply Base.</p> <p>The requirement relates to feedstock included in the SBE. Other feedstock can be used in SBP certified biomass. See CoC Standard for requirements.</p>
1.1.3	<p>The feedstock input profile is described and categorised by the mix of inputs.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> Feedstock input records 	<p>Records of feedstock inputs should show the relative volumes of different input feedstock used. These should include identification of volumes of primary, secondary and tertiary feedstock used, and a description of the inputs, including species.</p>

Criterion 1.2: The forest owner and manager hold legal use rights to the forest (CPET L1)

Reference	Indicator	Guidance
1.2.1	<p>The BP has implemented appropriate control systems and procedures to ensure that legality of ownership and</p>	<p>Factors affecting the risks of compliance will include the effectiveness of the land tenure system in place in the Supply Base.</p>

land use can be demonstrated for the Supply Base.	Where there are, or have been, disputes, evidence should be available that fair compensation has been made to previous owners and occupants, and that this has been accepted with free, prior and informed consent (FPIC).
Examples of means of verification: <ul style="list-style-type: none"> • Existing legislation • Levels of enforcement • Documents demonstrating that the BP is a legally defined entity • Documentation showing legal ownership patterns in the region, level of enforcement, records of disputes over land tenure, etc. In situations where customary rights govern use and access, these rights are clearly identifiable • Long term unchallenged use 	

Criterion 1.3: There is compliance with the requirements of local, national and applicable international laws, and the laws applicable to Forest Management (CPET L2)

Reference	Indicator	Guidance
1.3.1	<p>The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Existing legislation • Level of enforcement • Reference to sources of information in guidance notes • Interviews with key staff show a good knowledge of relevant forestry legislation • BPs have an up-to-date forest legislation/regulations registry • BPs make use of public information on legal non-compliance, provided by regulatory authorities 	<p>Certification is not a legal compliance audit.</p> <p>There should be evidence that systems are in place to ensure forestry operations are legal.</p> <p>Applicable legislation includes that in force in the country of harvest, covering the following aspects:</p> <ul style="list-style-type: none"> • Rights to harvest timber within legally gazetted boundaries • Payments for harvest rights and timber, including duties related to timber harvesting • Timber harvesting, including forest management and silvicultural activities • Environmental impacts (water and soil protection) • Biodiversity conservation, (including rare, threatened and endangered species and ecosystems) • Third parties' legal rights concerning use and tenure that are affected by timber harvesting • Trade and customs, in so far as the forest sector is concerned <p>Reference sources include:</p>

- UK Department of Energy and Climate Change (DECC), Timber Standard for Heat and Electricity, 2014
- Reference: Article 2 of the EU Timber Regulation (EUTR). *Regulation (EU) No. 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market* (OJ L 295, 12.11.2010, p.23)

Risks of non-compliance are greater in areas with high levels of corruption relating to the granting of harvesting permits and other aspects of the harvesting and wood trade.

Sources of information may include Interviews with involved stakeholders.

Reference sources include:

- The Royal Institute of International Affairs: www.illegal-logging.org
- Environmental Investigation Agency: www.eia-international.org
- Global Witness: www.globalwitness.org
- Transparency international index: www.transparency.org

Criterion 1.4: All applicable royalties and taxes have been paid (CPET L3)

Reference	Indicator	Guidance
1.4.1	<p>The BP has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Records of payments and correspondence with revenue authorities show payments are complete and up to date 	

Criterion 1.5: There is compliance with the requirements of CITES (CPET L4)

Reference	Indicator	Guidance
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1.5.1	<p>The BP has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • List of species purchased by BP • Records of field inspections • Assessment of risk that CITES species may be mixed in with non-CITES species in the supply chain • Interviews demonstrate that the CITES requirements are understood • CITES species are known and identified • Where relevant, the operation possesses permits for harvest and trade in any CITES species 	<p>Where appropriate to the operation, CITES requirements are understood at planning and operational level, and the requirements are implemented.</p> <p>Lists of species purchased by BPs should be verified as being consistent with the species available in the SB.</p> <p>It should be verified that tree species purchased by BPs are not listed in CITES or have been purchased with the appropriate permits and approvals.</p>
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Criterion 1.6: Harvesting does not violate traditional or civil rights

Reference	Indicator	Guidance
1.6.1	<p>The BP has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Traditional and civil rights are identified • Procedures are in place to ensure rights are not violated 	<p>‘Traditional rights’ are rights expressed by social groups or peoples, who affirm those rights to their lands, forests and other resources, based on long established custom or traditional occupation and use.</p> <p>Useful sources of information may include interviews with involved stakeholders.</p> <p>Reference sources include:</p> <ul style="list-style-type: none"> • www.globalwitness.org

Biomass feedstock is sustainably sourced (Principle 2)

Criterion 2.1: Management of the forest ensures that features and species of outstanding or exceptional value are identified and protected (CPET S8a; S8c)

Reference	Indicator	Guidance
2.1.1	The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with	<p>Sources of information include:</p> <ul style="list-style-type: none"> • The High Conservation Value Network http://www.hcvnetwork.org/

	<p>high conservation value in the Supply Base are identified and mapped.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Internet research • GIS maps of HCV areas • Interviews • Regional, publicly available data from a credible third party • The existence of a strong legal framework in the region 	<ul style="list-style-type: none"> • IUCN http://www.iucnredlist.org/ • SFI Section 6: Guidance to SFI 2015-2019 Standard, January 6. 2014 Forests with Exceptional Conservation Value http://www.sfiprogram.org/files/pdf/draft-sfi-2015-2019-standard-section-6/ • NatureServe http://www.natureserve.org/ • The Global Forestry Risk Register http://www.globalforestregistry.org/
2.1.2	<p>The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Maps • Guidance provided by BPs to suppliers/forest operators, regarding threats to the identified forests and areas with high conservation values, and verification of conformance through field inspections • Regional Best Management Practices • Standard Operating Procedures • Codes of Practice • Records of BPs' field inspections • Monitoring records • Interviews with staff • Publicly available information on the protection of the values identified • Regional, publicly available data from credible third parties • Environmental Impact Statements or Environmental Risk Assessment Reports • The existence of a strong legal framework in the region 	<p>The potential impacts of management activities on forests and other areas with high conservation values and biodiversity should be evaluated, and BPs should have systems in place to verify that mitigation measures are implemented in the field.</p> <p>Forests and other areas with high conservation values include those habitats in which protected and endangered plant and animal species are found.</p> <p>There is communication with suppliers/forest operators, and they are provided with records of meetings, talks, workshops, etc.</p> <p>Impacts include those originating in the area of operation but impacting outside the area of operation, such as downstream.</p> <p>Sources of information include:</p> <ul style="list-style-type: none"> • The High Conservation Value Network http://www.hcvnetwork.org/ • SFI Section 6: Guidance to SFI 2015-2019 Standard, January 6. 2014 Forests with Exceptional Conservation Value http://www.sfiprogram.org/files/pdf/draft-sfi-2015-2019-standard-section-6/ • NatureServe http://www.natureserve.org/ • The Global Forestry Risk Register http://www.globalforestregistry.org/
2.1.3	<p>The BP has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.</p>	<p>Production plantation forests are forests of exotic species that have been planted or seeded by human intervention and that are under intensive stand management, are fast growing, and subject to short rotations.</p>

Examples of means of verification: <ul style="list-style-type: none"> • Historical maps and enquiries with stakeholders • Regional, publicly available data from a credible third party • The existence of a strong legal framework in the region 	<p>Example: Poplar, Acacia or Eucalyptus plantations</p> <p>Sources of information include:</p> <ul style="list-style-type: none"> • http://www.fao.org/docrep/007/ae347e/ae347e02.htm • Global Forest Watch http://www.globalforestwatch.org/
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Criterion 2.2: Management of the forest ensures that ecosystem function is assessed and maintained, through both the conservation/set-aside of key ecosystems or habitats in their natural state, and the maintenance of existing ecosystem functions throughout the forest (CPET S5; S5a; 8b)

Reference	Indicator	Guidance
2.2.1	<p>The BP has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.</p> <p>Examples of Means of Verification:</p> <ul style="list-style-type: none"> • Regional Best Management Practices • Supply contracts • Assessment of potential impacts at operational level • Assessment of measures to minimise impacts • Monitoring results • Publicly available information on protecting the values identified • Level of enforcement • Regional, publicly available data from a credible third party • The existence of a strong legal framework in the region 	<p>Potential impacts of feedstock harvesting on ecosystems and biodiversity should be identified, with mitigation measures implemented in the field as necessary. Impacts should be monitored and there should be a mechanism to feed monitoring results back into operational practice.</p> <p>Impacts include those originating in the area of operation but impacting outside the area of operation, such as downstream.</p> <p>Assessment planning, implementation and monitoring should be based on scientific research and, if needed, information on comparable forests types.</p> <p>BPs may require suppliers and forest owners to adopt specific Best Management Practices and to be certified for certain tasks. These should be specified in purchasing or procurement policies.</p> <p>Feedstock sourced from stump material will require specific controls to minimise impact.</p> <p>Avoidable damage to the ecosystem is prevented by application of the most suitable and available methods and techniques for logging and road construction under the prevailing conditions.</p>
2.2.2	<p>The BP has implemented appropriate control systems and procedures for verifying that feedstock is sourced from</p>	<p>Potential impacts of feedstock harvesting on soil should be identified, with mitigation measures implemented in the field as</p>

	<p>forests where management maintains or improves soil quality (CPET S5b)</p> <p>Examples of Means of Verification:</p> <ul style="list-style-type: none"> • Regional Best Management Practices • Supply contracts • Records of BPs' field inspections • Assessment at an operational level of measures designed to minimise impacts on the values identified • Soil monitoring records • Interviews with staff • Publicly available information on the protection of soil • Level of enforcement • Regional, publicly available data from a credible third party • The existence of a strong legal framework in the region 	<p>necessary. Impacts should be monitored and there should be a mechanism to feed monitoring results back into operational practice.</p> <p>BPs may require suppliers and forest owners to adopt specific Best Management Practices and to be certified for certain tasks. These should be specified in purchasing or procurement policies.</p>
2.2.3	<p>The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Maps • Standard Operating Procedures, Codes of Practice and monitoring records indicate that appropriate safeguards are implemented 	<p>Key ecosystems or habitats include areas with statutory designations or high conservation value. Such conservation of set aside areas need to be of sufficient size or suitably connected with other similar areas to ensure their long-term viability.</p> <p>The BP should, in its procurement policies and practices, define the areas it considers to be key ecosystems or habitats and the reasons for its decisions.</p> <p>Reference sources include:</p> <ul style="list-style-type: none"> • RSB Conservation Impact Assessment Guidelines RSB-GUI-01-007-01 • IUCN http://www.iucnredlist.org/
2.2.4	<p>The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Regional Best Management Practices • Supply contracts • Assessment of potential impacts at operational level and of measures to minimise impacts • Monitoring results 	<p>BPs should evaluate the likely impacts of management practice and feedstock harvesting on ecosystems and biodiversity, and appropriate mitigation measures should be implemented. Impacts should be monitored and there should be a mechanism by which the monitoring results are fed back into operational practice.</p> <p>Impacts include those originating in the area of operation, but which may affect areas downstream or external to the area of operation.</p>

	<ul style="list-style-type: none"> Publicly available information on the protection of the identified values Level of enforcement Regional, publicly available data from a credible third party The existence of a strong legal framework in the region 	
2.2.5	<p>The BP has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> Regional Best Management Practices Supply contracts Records of BPs' field inspections Operational Assessment of measures designed to minimise impacts on the values identified Monitoring records Interviews with staff Publicly available information on the protection of ecosystems Level of enforcement Regional, publicly available data from a credible third party The existence of a strong legal framework in the region 	<p>'Residue' includes treetops and branches.</p> <p>Likely impacts of residue removal should be identified, and appropriate mitigation measures should be implemented. Impacts should be monitored and there should be a mechanism to feed monitoring results back into operational practice.</p> <p>Impacts include those originating in the area of operation, but which may affect areas downstream or external to the area of operation.</p> <p>BPs may require suppliers and forest owners to adopt specific Best Management Practices and to be certified for certain tasks. These should be specified in purchasing or procurement policies.</p>
2.2.6	<p>The BP has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> Regional Best Management Practices Supply contracts Records of BPs' field inspections Assessment at an operational level of measures designed to minimise impacts on the values identified Monitoring records Interviews with staff Publicly available information on the protection of ground and surface water Level of enforcement 	<p>This Indicator includes impacts outside the direct area of operation, such as runoff from harvesting operations, fertiliser or chemical application.</p> <p>Impacts on riparian zones are included in the evaluation of compliance with this Indicator.</p> <p>Likely impacts on water should be identified.</p> <p>Impacts include those originating in the area of operation, but which may affect areas downstream or external to the area of operation.</p> <p>BPs may require suppliers and forest owners to adopt specific Best Management Practices and to be certified for certain tasks. These should be specified in purchasing or procurement policies.</p>

	<ul style="list-style-type: none"> Regional, publicly available data from a credible third party The existence of a strong legal framework in the region 	
2.2.7	<p>The BP has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> Regional Best Management Practices Supply contracts Records of BPs' field inspections Assessment at an operational level of measures designed to minimise impacts on the values identified Monitoring records Interviews with staff Publicly available information on the protection of air quality Level of enforcement Regional, publicly available data from a credible third party The existence of a strong legal framework in the region 	<p>Potential impacts on air quality should be identified.</p> <p>Impacts include those originating in the area of operation, but which affect areas downwind or external to the area of operation.</p> <p>BPs may require suppliers and forest owners to adopt specific Best Management Practices and to be certified for certain tasks. These should be specified in purchasing or procurement policies.</p>
2.2.8	<p>The BP has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated pest management (IPM) is implemented wherever possible in forest management activities (CPET S5c).</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> Existing legislation Level of enforcement Regional Best Management Practices Supply contracts Records of BPs' field inspections Monitoring records Interviews with staff Regional, publicly available data from a credible third party The existence of a strong legal framework in the region 	<p>The requirement relates to current and ongoing use rather than historic use.</p> <p>If chemicals are used, proper equipment and training should be provided to minimise health and environmental risks.</p> <p>Chemical use should be justified, and there should be evidence that non-chemical alternatives have been considered.</p> <p>The use of class 1A and 1B pesticides, as drafted by the World Health Organisation, and of chlorinated hydrocarbons is not permitted.</p> <p>There should be evidence that the options for implementing IPM have been considered and, where appropriate, IPM is implemented.</p> <p>BPs may require suppliers and forest owners to adopt specific Best Management Practices and to be certified for certain tasks. These should be</p>

		specified in purchasing or procurement policies.
2.2.9	<p>The BP has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).</p> <p>Examples of Means of Verification:</p> <ul style="list-style-type: none"> • Regional Best Management Practices • Supply contracts • Operational Assessment of potential impacts and of measures to minimise impact • Monitoring results 	<p>Waste is defined as any substance or object that the holder discards or intends to discard, or is required to discard.</p> <p>References sources include:</p> <ul style="list-style-type: none"> • 2008 Waste Framework Directive (Directive 2008/98/EC)

Criterion 2.3: Management of the forest ensures that productivity is maintained (CPET S6; S6a; S6e)

Reference	Indicator	Guidance
2.3.1	<p>Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> ▪ Harvesting records, inventory and growth data and yield calculations demonstrate that biomass feedstock harvesting rates are not having significant negative impacts on forest productivity and long-term economic viability ▪ Documentation of Operational Practice 	<p>Evaluation must cover the entire Supply Base, and where appropriate, should be based on regional markers, such as growth/drain, inventory, mortality, and age class distribution.</p>
2.3.2	<p>Adequate training is provided for all personnel, including employees and contractors (CPET S6d).</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Existing legislation • Level of enforcement • Training course curricula • Records of BPs' field inspections • Training records • Interviews with staff 	<p>Adequate training provision should include assessment of training needs, and the delivery of training programmes.</p> <p>Training should be periodic and secure the level of required skills, including knowledge.</p>

	<ul style="list-style-type: none"> • Training plans, training records, and records of qualifications 	
2.3.3	<p>Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Analysis of contribution to the local economy • Description of: <ul style="list-style-type: none"> ○ The direct economic value that is created ○ Employment and personnel records ○ Policy, practice and the proportion of the budget spent on local suppliers ○ Procedures for appointment of local staff and their share of senior management. 	<p>Contributions to the local economy from feedstock harvesting and biomass production should be evaluated for positive and negative impacts.</p> <p>These should be calculated on the basis of economic performance indicators EC1, EC6, and EC7 of Global Reporting Initiative (GRI)</p> <p>Reference sources include:</p> <ul style="list-style-type: none"> • GRI (2013) G4 Sustainability Reporting Guidelines, Part 2: Implementation Manual. Global Reporting Initiative, p266 <p>Contribution to the local economy should include reasonable opportunities for employment to the local population, including indigenous peoples, as well as the local processing of timber and non-timber forest products.</p> <p>Contribution should be made to the development of local physical infrastructure and social services and programmes for the local population, including indigenous people, unless such infrastructure and social services are provided by government bodies. This contribution should be made in agreement with the local population.</p>

Criterion 2.4: Management of the forest ensures that forest ecosystem health and vitality is maintained (CPET S7)

Reference	Indicator	Guidance
2.4.1	<p>The BP has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Overall evaluation of potential impacts of operations on forest ecosystem health and vitality • Assessment of potential impacts at operational level and of measures to minimise impacts 	<p>Health and vitality of the forest ecosystem relate to the resilience of the ecosystem to withstand change. Indicators of health and vitality may include the level of disturbance observed, changes in biodiversity, or the presence or absence of key 'indicator' species.</p> <p>Relevant ecological functions and values may include:</p> <ul style="list-style-type: none"> • Forest regeneration and succession • Genetic, species and community diversity

	<ul style="list-style-type: none"> Regional Best Management Practices Supply contracts Monitoring results 	<ul style="list-style-type: none"> Natural cycles affecting productivity of the forest ecosystem <p>There are other forest services, not specifically covered elsewhere in this standard, which indicate forest health and vitality. These include functions that forests provide for people and/or the environment, such as:</p> <ul style="list-style-type: none"> Erosion control Flood control Adequate access for recreation, where possible. <p>There should be ongoing maintenance and improvement for other forest services provided, such as access for recreation.</p>
2.4.2	<p>The BP has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> Regional Best Management Practices Supply contracts Assessment of potential impacts at operational level and of measures to minimise impacts Monitoring results Regional, publicly available data from a credible third party The existence of a strong legal framework in the region 	<p>Appropriate management of such situations will depend upon the forest type, management objectives and local best practice and guidance.</p> <p>Fire, for example, may be an appropriate and necessary natural process in some forest types and seasons, and inappropriate in others. Where they are natural and necessary, the characteristics of any fire control interventions will be different to those taking place in forests where fire is not naturally part of their ecology.</p> <p>Pests and diseases also need to be managed appropriately, and this will vary according to management objectives. In conservation areas, for example, it may not always be appropriate to attempt eradication of certain pests and diseases. Where pesticides and other chemicals are used to address pests and diseases, regional and other best management practices must be adhered to.</p> <p>Control systems and procedures should, define appropriate management practice for the particular forest type and region.</p>
2.4.3	<p>The BP has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPET S7c).</p>	<p>Where the forest owner or management organisation is not legally able to protect the forest fully, there must be a system for working with appropriate regulatory bodies to identify, report, control and discourage unauthorised activity within the forest.</p>

Examples of means of verification:

- Maps
- Records of BPs' field inspections
- Monitoring records
- Interviews with staff
- Interviews with stakeholders
- Publicly available information

Where illegal/unauthorised activities are detected, appropriate action should be taken.

Control systems and procedures must firstly stipulate the adequate protection measures for the particular forest type and region, and secondly, verify that these are being implemented.

Criterion 2.5: Management of the forest ensures that legal, customary and traditional tenure and use rights of indigenous peoples and local communities related to the forest, are identified, documented and respected (CPET S9)

Reference	Indicator	Guidance
2.5.1	<p>The BP has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest, are identified, documented and respected (CPET S9).</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> ▪ Customary and traditional tenure and use rights are identified and documented ▪ Interviews with indigenous peoples, local communities and other stakeholders, indicate that their rights are being respected ▪ Appropriate mechanisms exist to resolve disputes ▪ Agreements exist regarding these rights 	<p>Indigenous peoples and local communities' legal rights concerning use and tenure, which are affected by timber harvesting, must be identified, and mechanisms put in place to ensure these rights are respected.</p> <p>In particular, rights should be identified, documented and respected in relation to:</p> <ul style="list-style-type: none"> • Trade and customs • Legal, customary and traditional tenure and use <p>The requirement includes ILO convention 169, which relates to the rights of indigenous and tribal peoples.</p> <p>Appropriate mechanisms should be in place to allow:</p> <ul style="list-style-type: none"> • Indigenous peoples and local communities to control and protect their rights and resources, unless they have chosen to delegate control with free and informed consent. • Indigenous peoples and local communities to be fully compensated for appropriation of traditional community knowledge or intellectual property. • Resolution of disputes over tenure claims and use rights <p>Substantial disputes involving multiple interests will normally prevent this Indicator from being considered low risk.</p>

2.5.2	<p>The BP has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfillment of basic needs.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> Interviews with local communities and other stakeholders indicate that subsistence needs are not endangered Agreements exist on resource rights, where these impact on the needs of communities 	<p>Any potential impacts on food, water and other basic needs should be identified.</p> <p>Reference sources include:</p> <ul style="list-style-type: none"> RSB <i>Food Security Guidelines</i>. RSB-GUI-01-006-01
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Criterion 2.6: Appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to Forest Management practices and to work conditions (CPET S10)

Reference	Indicator	Guidance
2.6.1	<p>The BP has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> Existing legal systems Level of enforcement Regional Best Management Practices Supply contracts Records of grievances and the outcomes from internal investigations Interviews with stakeholders and local community members Interviews with staff 	<p>Mechanisms for resolving complaints and grievances at the workplace level may be incorporated into existing legislation. Grievances related to tenure and use rights may require additional mechanisms where appropriate.</p> <p>Reference sources include:</p> <ul style="list-style-type: none"> RSB-GUI-01-005-01: <i>Social Impact Assessment Guidelines</i> RSB-GUI-01-012-01: <i>Land Rights Guidelines</i>

Criterion 2.7: The basic labour rights of forest workers are safeguarded (CPET S11)

Reference	Indicator	Guidance
2.7.1	<p>The BP has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.</p>	<p>The following ILO conventions have not been ratified in all countries. The Indicator must also be met in countries where ILO conventions are not ratified.</p>

	<p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Existing legislation • Level of enforcement • Employment contracts • Company policies • Interviews with HR Interviews with staff 	<p>Sources of information include:</p> <ul style="list-style-type: none"> • ILO Declaration on Fundamental Principles and Rights at Work (1998) based on the eight ILO Core Labour Conventions • ILO Convention 98 (Right to Collective Bargaining) • ILO Convention 87 (Freedom of Association) • ILO Convention 135 (Workers Representatives Convention). <p>Reference sources include:</p> <ul style="list-style-type: none"> • http://www.sa-intl.org/index.cfm?fuseaction=Page.VIEWPage&PageID=937
2.7.2	<p>The BP has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Existing legislation • Level of enforcement • Supply contracts • Records of BPs field inspections • Monitoring records • Interviews with staff 	<p>‘Compulsory labour’ is defined as “All work or service that a person has not offered to do voluntarily and is made to do under the threat of punishment or retaliation, or is demanded as a means of repayment of debt”.</p> <p>The Indicator must be met in countries where ILO conventions have not been ratified.</p> <p>ILO Conventions 29 and 105 (Forced & Bonded Labour)</p> <p>Reference sources include:</p> <ul style="list-style-type: none"> • http://www.sa-intl.org/index.cfm?fuseaction=Page.VIEWPage&PageID=937
2.7.3	<p>The BP has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Existing legislation • Level of enforcement • Supply contracts • Records of field inspections • Operational assessment of measures designed to minimise impacts on the values identified • Monitoring records • Interviews with staff 	<p>Child labour is defined as any work performed by a child younger than the age stipulated below, except as provided for by ILO Recommendation 146.</p> <p>Definition of a child: any person less than 15 years of age, unless the minimum age for work or mandatory schooling is stipulated as being higher by local law, in which case the stipulated higher age applies in that locality.</p> <p>The Indicator must be met in countries where ILO conventions are not ratified.</p> <p>ILO Convention 138 & Recommendation 146 (Minimum Age and Recommendation).</p>

		Reference sources include: <ul style="list-style-type: none"> • http://www.sa-intl.org/index.cfm?fuseaction=Page.ViewPage&PageID=937
2.7.4	<p>The BP has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Existing legislation • Level of enforcement ▪ Supply contracts • Records of BPs' field inspections • Monitoring records • Interviews with staff • Payroll records • Company policies indicating that the requirements are met 	<p>The Indicator must be met in countries where ILO conventions are not ratified.</p> <p>Sources of information include:</p> <ul style="list-style-type: none"> • ILO Conventions 100 (Equal remuneration for male and female workers for work of equal value) and 111 (Discrimination) <p>Reference sources include:</p> <ul style="list-style-type: none"> • http://www.sa-intl.org/index.cfm?fuseaction=Page.ViewPage&PageID=937
2.7.5	<p>The BP has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Existing legislation • Level of enforcement ▪ Supply contracts • Records of BPs' field inspections • Monitoring records • Interviews with staff 	<p>Requirements for minimum pay and employment conditions are those that legally apply in the local, regional or national context. Minimum requirements should be based on local best practice (as defined and ratified by relevant employers' associations and trade unions) even if this exceeds legal minimum levels.</p> <p>Further guidance is available in the Social Accountability 8000 standard referenced below.</p> <p>Reference sources include:</p> <ul style="list-style-type: none"> • http://www.sa-intl.org/index.cfm?fuseaction=Page.ViewPage&PageID=937

Criterion 2.8: Appropriate safeguards are in place to protect the health and safety of forest workers (CPET S12)

Reference	Indicator	Guidance
2.8.1	<p>The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Existing legislation 	<p>Appropriate safeguards include the requirement to identify risks, to provide appropriate training courses, and to provide appropriate Personal Protective Equipment (PPE).</p>

- Course curricula from safety trainings
- Training records
- PPE available to workers at job sites
- Records of BPs' field inspections
- Safety risk assessments
- Interviews with staff

Criterion 2.9: Regional carbon stocks are maintained or increased over the medium to long term

Reference	Indicator	Guidance
2.9.1	<p>Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Maps • Procedures and records • Regional, publicly available data from a credible third party • The existence of a strong legal framework in the region 	<p>Examples of areas that may have high carbon stock:</p> <ul style="list-style-type: none"> • Wetlands: Land that is covered with or saturated by water, permanently or for a significant part of the year. These should remain as wetlands; that is biomass production should not result in drainage of previously undrained soil • Peatland: This should remain as peatland unless evidence is provided that the production of feedstock does not involve drainage of previously undrained soil
2.9.2	<p>Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> • Results of analysis of carbon stocks • Analysis of historic and present carbon uptake rates • Regional, publicly available data from a credible third party • The existence of a strong legal framework in the region 	<p>SBP recognises that at some times in some catchments, due to natural forest cycles that may be wholly unassociated with wood for energy, carbon stocks may decline for a period. These declines will be naturally recovered, and carbon stocks will be maintained or increased.</p> <p>Assessment of risks to the carbon stock may include:</p> <ul style="list-style-type: none"> • Collection of reliable data on current stocks, growth rates, age class distributions, and existing market requirements • Analysis of the data • Examination of various outcomes (changing species or productivity, disease, fire, other markets) • Consideration of risk over various spatial and temporal scales, with a minimum horizon of five to ten years • Awareness of pressures or opportunities from outside the supply area • Recognition that there may be periods of transition requiring management • Regular review

Where there is a direct land use change, the carbon emissions associated with this may need to be calculated.

Sources of information include:

- <https://www.ofgem.gov.uk/publications-and-updates/renewables-obligation-sustainability-criteria-guidance>
- http://ec.europa.eu/energy/renewables/biofuels/doc/2010_bsc_example_land_carbon_calculation.pdf

Criterion 2.10: Genetically modified trees are not used

Reference	Indicator	Guidance
2.10.1	<p>Genetically modified trees are not used.</p> <p>Examples of means of verification:</p> <ul style="list-style-type: none"> ▪ Reference sources, interviews and records concerning use of genetically modified trees ▪ Regional, publicly available data from a credible third party ▪ The existence of a strong legal framework in the region 	<p>Genetically modified trees are those in which the genetic material has been altered in a way that does not occur naturally by pollination and/or natural recombination, taking into account applicable legislation providing a specific definition of genetically modified organisms.</p> <p>Reference sources include:</p> <ul style="list-style-type: none"> • http://www.globalforestregistry.org/