

# Stakeholder report

on external input provided by stakeholders  
for assessment of the

certification scheme SBP

(request for advice from April 2018)

against the Dutch legal sustainability criteria  
for solid biomass for energy applications

by the

Advisory Commission on Sustainability  
of Biomass for Energy Applications

September 2018



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## 1 Scope of this report

### 1.1 Introduction

This stakeholder report focusses on the external input as provided by stakeholders and on the commissions' response to that input. This report is part of the advice of the advisory commission on sustainability of biomass for energy purposes (ADBE) to the minister of Economic Affairs and Climate Policy (EZK) on the application for approval by certification scheme "Sustainable Biomass Programme" (SBP). Another part of the advice to the minister is the public assessment report on the assessment of SBP. In that public assessment report a general introduction is given, as well as a description of the commission's assessment procedure.

This stakeholder report will be published on the ADBE website after the minister has taken and published a decision on the SBP request for approval.

### 1.2 External input for the certification scheme SBP

On April 17, 2018 the advisory commission received a request for advice on SBP from the Dutch Ministry of EZK. Via its website and via a news message distributed by email the ADBE announced that external input could be submitted within four weeks (April 17 to May 15).

External input was received from the following stakeholders:

1. The US National Wildlife Federation, further referred to as "NWF";
2. Greenpeace Nederland in cooperation with Natural Resources Defense Council, further referred to as "Greenpeace and NRDC".

In the tables of this report, their input will be marked with colours against a light yellow background:

- |                                 |
|---------------------------------|
| 1. Input by the NWF             |
| 2. Input by Greenpeace and NRDC |

The tables in this report will also include the response of the ADBE to the external input. This will be marked red against a light-blue background:

Reaction by the advisory commission is marked by red-coloured text
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In the following chapters only those sustainability criteria and management criteria are listed for which external stakeholders have provided external input. The "toetsingsprotocol" (assessment protocol; available on the ADBE webpage "[Toetsingsprocedure](#)", in Dutch) as well as chapter 4 of the public assessment report give the full list of sustainability and management criteria.

### 1.3 Readers guide

The next four chapters in this report give the external input provided by the stakeholders plus a response by the ADBE. External input towards the sustainability criteria is given in chapters 2 and chapter 3, on general and more detailed external input, respectively. External input towards the management criteria is given in chapters 4 and 5, on general and more detailed external input, respectively. Chapter 6 lists the documents that were consulted by the commission when taking the external input into account. An annex lists the abbreviations that are used throughout this report.

## 2 General input towards sustainability criteria

The ADBE’s form for submitting external input gives in section B the possibility to make more general comments on sustainability criteria. Such general comments provided by the stakeholders are listed in the table below. Please note that this input can only be considered by the commission as part of the assessment in case this input applies to one or a number of individual sustainability criteria.

<u>Overarching subject (sustainability criteria)</u>	<u>External input</u>	<u>Commission’s reaction to the external input</u>
<p>GHG emissions, carbon sinks, carbon debt and land use change (sustainability criterion 1.1)</p>	<p>One of the critical flaws of the Sustainable Biomass Program certification is how it evaluates greenhouse gas emissions. SBP’s carbon accounting methodology fails to assess carbon stock changes or smokestack emissions. By not weighing these tradeoffs, SBP omits the main factors in evaluating GHGs. Bypassing key elements of the GHG life cycle opens the door to biomass that does not address climate change. Indeed, SBP’s insufficient standards actually provide a perverse incentive for biomass that is counterproductive for the climate, as we will show.</p> <p>Since SBP does not adequately differentiate between high- and low-pollution forms of biomass, the types of biomass that should be promoted for climate mitigation are likely to be left behind. We know the Netherlands is attuned to these distinctions and has incorporated sophisticated pro-climate measures into the Verification Protocol. Dutch standards like requiring a 40 year time horizon for paying off the carbon debt, efficiency minimums, and greenhouse gas reductions relative to fossil fuels all contribute to a robust climate policy that would be definitively undercut by SBP.</p>	<p>The questions “how to calculate GHG emissions” and “how to take carbon debt into account” have been answered when formulating the sustainability criteria as published in the Dutch legal regulation “conformiteitsbeoordeling vaste biomassa voor energietoepassingen” (which translates as “conformity assessment solid biomass for energy applications”). This regulation took effect as from January 1<sup>st</sup> 2018. The commission’s task is to assess whether certification schemes comply with these legal criteria. As a result, and although understanding the importance of the comments made by NWF, the commission cannot take into account other GHG accounting methodologies than the one defined in the Dutch regulation. The commission will thoroughly assess whether SBP meets these criteria which include criteria on GHG emissions and GHG emission calculation methodologies (Dutch sustainability criterion 1.1).</p>

### 3 External input on sustainability criteria

**Principle 1: The use of biomass leads to a substantial reduction in greenhouse gas emissions calculated across the entire chain in comparison with the use of fossil fuels**

<u>Sustainability criterion from Dutch legislation</u>	<u>External input provided by stakeholders</u>	<u>Commission’s reaction to the external input</u>
<p>1.1 a The reduction in CO<sub>2</sub>-eq emissions is calculated to be a minimum of 70% per year on average based on the EU reference value. The average emissions have a maximum of 56 g CO<sub>2</sub>-eq/MJ for electricity and 24 g CO<sub>2</sub>-eq/MJ for heat.</p>	<p><i>Please note that it is impossible to demonstrate compliance with this part a of the sustainability requirement by using a certification scheme, as compliance can only be demonstrated afterwards (looking back at all consignments of biomass used during a year) and by looking at consignments that were possibly delivered using multiple certification schemes.</i></p> <p><i>As a result, you are not asked to give external input for criterion 1.1a.</i></p> <p><i>Please also note that approval can only be given for criterion 1.1 (the sum of 1.1a and 1.1b) and that, as a result, it is not possible to fully comply with requirement 1.1 using certification.</i></p>	
<p>1.1 b No consignment of biomass shall result in emissions above 74 g CO<sub>2</sub>-eq/MJ for electricity and 32 g CO<sub>2</sub>-eq/MJ for heat. The calculated maximum CO<sub>2</sub>-eq emission levels are based on the most recent European Commission publication on sustainability criteria for biomass and on the reference values provided for fossil fuels.</p>	<p>SBP does not measure net emissions, only emissions from production and transportation. This overlooks key criteria--changes to carbon stocks and smokestack emissions. Although it is common for forest management schemes to overlook carbon accounting, SBP is different in that it misleadingly claims to consider carbon, but only evaluates a portion of the life cycle.</p> <p>Notably, SBP certified wood has been documented as being not only destructive to sensitive habitat but also harmful for the climate. Enviva, a pellet company that gets certified by SBP, was documented in the Washington Post and Wall Street Journal for its damaging practices. Enviva was not penalized by SBP for this—instead it openly continues the same practices under SBP certification. Enviva’s Track and Trace program publicly admits that it still collects wood from bottomland hardwood forests, a sensitive ecosystem that takes many years to generate.</p> <p>Research on the topic of biomass from the southeast US found that there is a 35-50 year window before biomass even shows an improvement relative to fossil fuels. Yet, SBP certifies this type of high-pollution biomass. SBP does not have adequate standards on emissions nor does it consider key variables to climate performance. This standard undercuts meaningful efforts to actually identify sustainable biomass.</p> <p>The Verification Protocol outlines in Appendix 1 that biomass emissions should cover cultivation, processing, transport and distribution, and combustion. SBP’s analysis methodology in Instruction Document 5B only covers the first three of those</p>	<p>In answer to the comments by NWF on the GHG emission calculation methodology the commission refers to the reaction given in chapter 2.</p> <p>In answer to the comments referring to Enviva and biomass from the southeast of the U.S.: please note that the current SBP request for approval is on sustainability criteria 1.1 and 12.1-12.6. SBP is – in the application for approval that the commission is evaluating – not requesting for approval of the sustainable forestry management criteria under principles 2 – 11. The current application is only for the CoC and for biomass category 5 (biogenic residues and waste). As a result, the commission will not give a reaction here on these comments.</p> <p>Last but not least NWF makes a comment on the GHG calculation methodology, stating that also combustion must be included. NWF refers to the verification protocol.</p> <p><i>(Please note that the verification protocol is not used by the commission as this is used for verification, not for certification. The point made by NWF is however also valid for the GHG methodology to be applied by certified companies).</i></p> <p>Dutch sustainability criteria 1.1 and 12.2 refer to “a methodology that is based on the most recent European Commission publication on sustainability criteria for solid biomass and the reference values provided for fossil fuels”. As long as the RED-II (second version of renewable energy directive) is not published and enforced, the most recent EC publication on sustainability criteria for solid biomass is Staff Working Document 259 from July 2014, which (for GHG emission methodologies) refers to COM(2010)11. COM(2010)11 Annex I point 12 reads “Emissions from the fuel in use, eu, shall be taken to be zero for solid and gaseous biomass”. To our understanding, the default values that were included in SWD(2014)259 do take into account the CH<sub>4</sub> and N<sub>2</sub>O emissions at the conversion of biomass into heat and/or electricity.</p>

		<p>categories, leaving out the most important one. Moreover, SBP's standards do not provide a quantitative limit on emissions. Consequently, SBP cannot guarantee that the Verification Protocol criteria will be met.</p> <p>Sources 1.1 – 1.5</p> <p>We have reviewed the stakeholder input by NWF and support that comment</p>	<p>The commissions' preliminary judgement on Dutch sustainability criterion 1.1 reads as follows. This criterion consists of three parts:</p> <ul style="list-style-type: none"> <li>• <u>The reduction in CO2-eq emissions is calculated to be a minimum of 70% per year on average based on the EU reference value. The average emissions have a maximum of 56 g CO2-eq/MJ for electricity and 24 g CO2-eq/MJ for heat.</u> To the opinion of the commission it is impossible to demonstrate compliance with part (a) of the sustainability requirement by using a certification scheme, as compliance can only be demonstrated afterwards (looking back at all consignments of biomass used during a year) and by looking at consignments that were possibly delivered using multiple certification schemes. SBP does therefore not cover this part of the criterion.</li> <li>• <u>No consignment of biomass shall result in emissions above 74 g CO2-eq/MJ for electricity and 32 g CO2-eq/MJ for heat.</u> SBP does not specify maximum GHG emissions nor minimum percentage emission reduction levels for individual batches of biomass, and therefore does not cover this part of the criterion.</li> <li>• Part (b) second requirement: <u>The calculated maximum CO2-eq emission levels are based on the most recent European Commission publication on sustainability criteria for biomass and on the reference values provided for fossil fuels.</u> This part of the criterion is covered by SBP through Instruction document 6A section 2.2.</li> </ul> <p>The commission concludes that Dutch sustainability criterion 1.1 is partly addressed by SBP. This is a conclusion for biomass category 5, as SBP applied for approval of sustainability criterion 1.1 only for category 5.</p>
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**Principle 12: A chain of custody system is in place for the biomass, covering the entire chain from the first actor to the energy producer, that links the source to the material used in the product or product group, and provides greenhouse gas emission data of each individual link.**

	<u>Sustainability criterion from Dutch legislation</u>	<u>External input provided by stakeholders</u>	<u>Commission's reaction to the external input</u>
12.2	<p>Each link in the chain of custody has the relevant greenhouse gas emissions information for its own organisation, which has been obtained using a methodology that is based on the most recent European Commission publication on sustainability criteria for solid biomass and the reference values provided for fossil fuels.</p>	<p>SBP does not require adequate information on GHG emissions.</p> <p>We have reviewed the stakeholder input by NWF and support that comment</p>	<p>The commission assesses this criterion taking the following considerations into account. It is the end user that will have to make the final calculation (for meeting Dutch sustainability criterion 1.1). This is also mentioned in instruction document 5A, section 2.1.1 of the SBP scheme.</p> <p>The end user can only make a GHG calculation (or pick the appropriate default value) if he has received the relevant information through the CoC.</p> <p>The commission concludes that SBP fully addresses Dutch criterion 12.2, as SBP requires to have and provide to the next owner of the biomass all necessary data to facilitate energy and GHG calculations (SBP instruction</p>

			<p>document 5A, indicator 2.1.1 and SBP Standard 5 section 5.2, and the complete SBP instruction document 5B). SBP instruction document 6A section 2.2 covers the second part of criterion 12.2 on the EU GHG calculation methodology.</p>
12.3	<p>Each link in the chain of custody keeps all necessary documentation for demonstrating compliance with the applicable sustainability requirements available for a minimum of 5 years.</p>	<p>SBP is not applying to qualify for sustainability criteria beyond GHG emissions (Criteria 1.1b). Criterion 12.3 should not be satisfied without first satisfying criteria in Principles in 4, 7, 8, 9, and 10.</p> <p>We have reviewed the stakeholder input by NWF and support that comment</p>	<p>The commission does not agree with the comment of the stakeholders. SBP has applied for approval of criteria 12.1-12.6 for categories 1, 2, 3, 4 and 5 to become approved as a chain-of-custody (CoC) system, which forwards sustainability information through the CoC and possibly complements it with information provided by other certification schemes. The commission is of opinion that it can assess whether the CoC criteria are complied with without assessing any other sustainability criterion. For this specific criterion it is relatively straightforward as the scheme shall require to keep documentation available for a minimum of 5 years.</p> <p>SBP standard 6 indicators 6.4.1 and 6.4.2 cover this criterion. The commission therefore concludes that Dutch criterion 12.3 is fully addressed by SBP.</p>
12.5	<p>Each link in the chain of custody applies a mass balance in case of mixing or splitting of materials with different sustainability characteristics.</p> <p>For the mixing the following applies:</p> <ul style="list-style-type: none"> <li>- The method shall be applied at least at the level of a location;</li> <li>- The organisation defines a period with a maximum of a year, during which incoming and outgoing consignments are measured and reports the results;</li> <li>- All sustainability characteristics of mixed biomass output can be traced back to the characteristics and quantities of the incoming consignments, taking account of the applicable conversion factors.</li> </ul>	<p>Again, SBP is not qualifying for the sustainability characteristics outlined in the Verification Protocol.</p> <p>We have reviewed the stakeholder input by NWF and support that comment</p>	<p>The commission would like to emphasize that it does not take into account the content of the Dutch verification protocol (as published on <a href="#">this web page</a>) other than chapter 8 of this verification protocol for making assessments for a regional risk based approach.</p> <p>The commission assesses whether certification schemes comply with the sustainability criteria that are published in Dutch legislation (in the "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"). Compliance with these Dutch legal sustainability criteria can also be demonstrated through verification, for which the verification protocol must be used.</p> <p>The commission has assessed whether SBP complies with the sustainability criteria 12.5 from the Dutch legislation as mentioned in the first column of this row. Dutch criterion 12.5 consists of 4 parts, which have been considered by the commission one by one (with numbers 2, 3 and 4 applying in case of mixing materials with different sustainability characteristics):</p> <ol style="list-style-type: none"> <li>1. <u>Each link in the chain of custody applies a mass balance in case of mixing or splitting of materials with different sustainability characteristics.</u> In instruction document 5D, SBP requires that, for each biomass category defined in the DTS (data transfer system) DBS (Dynamic Batch Sustainability) data, the organization shall set up and maintain a mass balance account according to which additions and deductions of credits shall be recorded. The commission therefore concludes that SBP covers the first part of the criterion.</li> <li>2. <u>The method shall be applied at least at the level of a location.</u> This part of the criterion is covered by SBP through Standard 4 indicator 5.3.3 in combination with the SBP Standard 4, Indicator</li> </ol>

			<p>5.1.2 which tells that in case of conflict SBP standards take precedence.</p> <p>3. <u>The organisation defines a period with a maximum of a year, during which incoming and outgoing consignments are measured and reports the results.</u> The commission concludes that this part of the criterion is covered as a period of 12 months is defined (SBP instruction document 5B, 3.2.1 and 3.2.4) and SBP allows to only slightly exceed the 12 month reporting period based on a number of defined criteria (SBP instruction document 5B, 3.2.5).</p> <p>4. <u>All sustainability characteristics of mixed biomass output can be traced back to the characteristics and quantities of the individual incoming consignments, taking account of the applicable conversion factors.</u> This part of the criterion is covered by instruction document 5D 2.4 and 2.5.</p> <p>The commission therefore concludes that Dutch criterion 12.5 is fully addressed by SBP.</p>
12.6	<p>When being mixed with other consignments category 1 and 2 consignments only complying with the requirements 1.1, 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, 5, 7.1 and 7.3 are distinguished as controlled biomass on a mass balance. For controlled biomass, the biomass producer is the first link in the chain of custody and the source is the forest management unit or a defined supply area.</p>	<p>SBP is not complying with any of these criteria except 1.1, which it does not adequately address, as outlined above.</p> <p>We have serious concerns with PEFC’s announcement that ‘The Sustainable Forestry Initiative (SFI) Fiber Sourcing Standard will now be recognized by the Programme for the Endorsement of Forest Certification (PEFC) as a tool that meets PEFC requirements for the avoidance of controversial sources in the PEFC Chain of Custody standard (link). Consequently, feedstock sourced in compliance with the SFI Fiber Sourcing Standard or supplied with the relevant SFI % Certified Sourcing claim may be considered to be SBP-compliant feedstock.’</p> <p>The SFI Chain-of-Custody and Fiber Sourcing standards do not require that the relevant greenhouse gas emissions information be collected or documented. An overarching concern with the SFI Certified Sourcing label and Fiber Sourcing Standard is that they do not require source forests to meet the SFI Forest Management Standard – or much of anything else – when consumers are likely to assume otherwise. The vast majority of the SFI Forest Management Standard’s requirements for forest management and conservation are not reflected in the Fiber Sourcing Standard. The Fiber Sourcing Standard does not even recognize that source forests should be logged at sustainable rates. The Fiber Sourcing Standard’s requirements for sourcing from outside North America are even more cursory, and still do not address some of the most crucial concerns in forestry in the tropics; including the conversion of forests to plantations, harm to threatened and endangered species that are not legally</p>	<p>The commission concludes that SBP does not contain - as part of the current application for approval - criteria or indicators allowing to demonstrate that controlled biomass complies with the Dutch sustainability criteria 1.1, 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, 5, 7.1 and 7.3.</p> <p><b>Further answer to the input by Greenpeace and NRDC</b> The commission has no opinion on the fact that SBP approves other schemes (such as FSC, PEFC and SFI). The commission notes that - through the CoC - SBP is able to bring forward information on the fact that the sustainability (forest management criteria) was demonstrated at the pellet mill by an SBP approved scheme (FSC, PEFC or SFI). To be fully clear on this: by doing so, compliance with forest management criteria at the forest management level hence is demonstrated by the other by SBP approved scheme (FSC, PEFC or SFI), not by SBP. Whether or not this proof is accepted in The Netherlands will depend on whether the SBP-approved scheme (FSC, PEFC or SFI) is approved for demonstrating compliance with these Dutch legal criteria by the Dutch Minister of EZK. A consequence of this is that the information on which certification scheme was used to demonstrate compliance with the SFM criteria, must be brought through the CoC to the end user.</p> <p>To be fully clear: If an SBP certified pellet mill receives feedstock with an SBP-approved Forest Management Scheme claim, then the certification scheme that was used to demonstrate compliance with the SFM criteria must be known by the end user of the pellets produced by this pellet mill. The information to be passed on through the CoC must be the name of the FSC-approved or PEFC-endorsed scheme, as (a) there are countries with more than one FSC-approved or PEFC-endorsed scheme and (b) these schemes might not be approved (in the Netherlands) for the same</p>



		<p>recognized/protected, destruction of high carbon stock forests, and road construction and logging in intact forest landscapes. Where the Fiber Sourcing Standard does address key issues both within and outside of North America (e.g., illegal logging, BMPs, biodiversity, and social issues), the provisions often have serious gaps, generally failing to require any particular outcomes or performance measures for the source forests.</p> <p>Sources 2.4 and 2.5</p>	<p>criteria.</p>
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#### 4 General input towards management criteria

The ADBE's form for submitting external input gives in section C the possibility to make more general comments on management criteria. No such general comments were received.

<u>Overarching subject (management criteria)</u>	<u>External input</u>	<u>Commission's reaction to the external input</u>
The scheme is managed in a thorough way (management criteria 5-8)		

## 5 External input on management criteria

The table below lists the external input on management criteria as provided by the stakeholders, and the reaction of the ADBE to that external input.

<u>Management criterion from Dutch legislation</u>	<u>External input provided by stakeholders</u>	<u>Commission's reaction to the external input</u>
<p>1 A widely supported need exists for the scheme and for the conformity assessments that are performed based on the scheme.</p>	<p>We recognize that the ADBE has changed its translation of this Dutch criterion. The previous translation was "A general need exists for the scheme and for the conformity assessments that are performed based on the scheme." This has now changed into "A widely supported need exists ..".</p> <p>This is relevant because this new translation shows that the Dutch criterion is actually tougher than</p> <p>It is a fact that SBP is supported by only one group of stakeholders, which are representatives from the industry. While we previously already doubted that this support by the industry addresses "a general need", it certainly does not show "a widely supported need". This would only be the case of more different types of stakeholders would have expressed this need. Therefore, we ask the Commission to reconsider its conclusion, as this criterion is not addressed by SBP.</p> <p>Sources:</p> <ul style="list-style-type: none"> <li>• SBP documents for the management of the scheme</li> <li>• 2.6 and 2.7</li> <li>• Please also take not of all the sources that are not in our hand, because there is a large number of civil society organizations that wanted to participate in the development of the SBP standard/scheme but learned that they were not taken seriously and therefore stopped producing constructive input.</li> </ul>	<p>Both the scheme manager as well as stakeholders that provided external input indicate that the scheme was developed due to a need amongst end-users of biomass ("the industry"). The commission observes that the need is broader than a need by end-users of biomass alone, as in certain pellet-producing regions such as North America the share of FSC/PEFC certified forests is still relatively low, and therefore also North American (in particular private) forest owners and pellet producers benefit from the existence of a scheme like SBP that includes a risk based approach. As a result, also the forestry sector and pellet mill owners can be considered to be stakeholders benefiting from the existence of this scheme.</p> <p>The question to be answered by the commission is whether a need from the above mentioned stakeholders alone can be considered to be "a widely supported need". The commission observes that "widely supported need" is not defined in the legislation under which this assessment is made. The commission is of opinion that "widely supported" does not mean "all different types of stakeholders", but rather means "a sufficient amount of stakeholders". As quite a large number of stakeholders (i.e. end-users converting biomass into energy, pellet mills, forest owners) have an interest in SBP, the commission concludes that there is a widely supported need for the scheme and for the conformity assessments based on the scheme, and hence considers SBP to fully address management criterion 1. The question whether other than the above mentioned stakeholders have had an influence on the development and decision-making of the scheme is discussed under management criteria 2 and 7.</p>
<p>2 The development of the scheme is transparent and participation in the process of development of the scheme is open to anyone.</p>	<p>The ADBE website lists two new standard documents that SBP has produced since its withdrawal from the ADBE assessment procedure. We could not find any evidence that the development of these documents was open to a public consultaton or stakeholder consultation.</p> <p>This support comments made in the previous round that SBP openness to anyone's input exists only on paper as in reality this input is not taken seriously and all decisions are made solely by the economic staekholders.</p> <p>Sources:</p> <ul style="list-style-type: none"> <li>• 2.1 and 2.2</li> <li>• SBP documents for the management of the scheme</li> <li>• 2.6 and 2.7</li> <li>• Please also take not of all the sources that are not in our hand, because there is a large number of civil society organizations that</li> </ul>	<p>SBP recently prepared two new documents: (a) Instruction document 5D with CoC requirements for companies delivering biomass to the Netherlands, and (b) a pdf document which is a collection of all text from the part "Normative interpretations" on the SBP website.</p> <p>The commission was informed by the SBP scheme manager that the method for developing instruction document 5D was clear to SBP scheme management and to the Stakeholder Committee. This method – which was recently formally approved by the SBP stakeholder committee as a document called "Standard setting procedure" – includes (together with names and organisations listed on the SBP website) the organisations participating and the decision-making process.</p> <p>When starting to develop the instruction document 5D, SBP scheme management and the stakeholder committee came to the conclusion that developing this new instruction document did not require stakeholder</p>

wanted to participate in the development of the SBP standard/scheme but learned that they were not taken seriously and therefore stopped producing constructive input.

consultation. The ADBE does not disagree to this conclusion, as interpretation document 5D (as well as the pdf with normative interpretations) is on the practical implementation of the scheme and does not change or add to the normative part (the basic principles, criteria and indicators) of the SBP certification scheme. The commission has noted that SBP did make a public announcement on the new instruction document 5D in Issue 10 of the SBP Bulletin. Interpretation document 5D was made publicly available after it was approved by the stakeholder committee.

As the method was not yet formally approved within SBP at the time the scheme was modified, the commission will not score "fully addressed" but concludes that Dutch management criterion 3 is largely addressed by SBP.

## 6 Documents used for considering the external input

The following documents have been used when considering the external input.

### 6.1 Documents submitted by NWF

- 1.1. [Sustainable Biomass Partnership. Instruction Document 5B: Energy and GHG Data v1.1](#)
- 1.2. Washington Post. [How Europe's climate policies led to more U.S. trees being cut down.](#)
- 1.3. Wall Street Journal. [Europe's Green-Fuel Search Turns to America's Forests.](#)
- 1.4. Colnes et al. 2012. [Biomass Supply and Carbon Accounting for Southeastern Forests](#)
- 1.5. Enviva. [Track and Trace.](#)

### 6.2 Documents submitted by Greenpeace and NRDC

- 2.1. SBP - Instruction Document 5D: Dynamic Batch Sustainability Data. Version 1.1 March 2018
- 2.2. SBP - Normative Interpretations. December 2017
- 2.3. SBP Audit Report for Energy and GHG data (SAR). Version 1.2, March 2018
- 2.4. SBP Normative interpretations; December 2017#2. Q&A regarding "Section 8.2"
- 2.5. Forest Ethics. "[SFI: New and Unimproved. Analysis of Revised Sustainable Forestry Initiative Standards](#)," 2015. Detailed analysis for the report attached to this consultation. See Pg. 1-5 of detailed analysis for list of issues.
- 2.6. THE SUSTAINABLE BIOMASS PROGRAM: SMOKE SCREEN FOR FOREST DESTRUCTION AND CORPORATE NON-ACCOUNTABILITY. ISSUE PAPER. NRDC and DOGWOOD Alliance. June 2017.
- 2.7. Are the UK 'biomass sustainability standards' legitimising forest destruction? By Almuth Ernsting, Biofuelwatch. Published in The Ecologist, 18th August 2016.

## Annex – Abbreviations

ADBE	Advisory commission Sustainability Biomass for Energy applications
c.o.	covered otherwise
CoC	Chain-of-Custody
DBS	Dynamic Batch Sustainability
DTS	Data Transfer System
EU	European Union
EZK	“Ministry of EZK” is the Dutch Minister of Economic Affairs and Climate Policy
GHG	GreenHouse Gas
NRDC	Natural Resources Defence Council
NWF	US National Wildlife Federation
PEFC	Programme for the Endorsement of Forest Certification
SAR	SBP audit report for Energy and GHG data
SBP	Sustainable Biomass Programme
SFI	Sustainable Forestry Initiative