

Public report
on the assessment of

certification scheme SBP

(request for advice from July 2018)

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

by the

Advisory Commission on Sustainability
of Biomass for Energy Applications

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1 Introduction

1.1 Dutch sustainability criteria for solid biomass for energy applications

In September 2013 more than 40 Dutch government bodies, companies and non-governmental organisations endorsed the National Energy Agreement for Sustainable Growth. Part of this Agreement deals with targets for the more sustainable use of energy in the years 2020 and 2023. Bio-energy plays an important role in meeting these targets. It was also agreed that sustainability criteria would be formulated for the large-scale application of biomass for cofiring in coal-fired power plants, and that these sustainability criteria would include forest management and climate aspects like greenhouse gas emissions, carbon debt and indirect land use change.

A working group with representatives from energy companies, environmental organisations and the government has further developed the sustainability criteria into principles and underlying criteria. As from 2015 these principles and criteria have been included as a condition in the subsidy regulation SDE+ for cofiring and for production of industrial steam from wood pellets, and from beginning 2018 these principles and criteria are laid down in environmental legislation. In order to demonstrate compliance with these principles and criteria, companies need to demonstrate that the biomass used fully meets the legal requirements. This can be achieved by use of certification schemes and/or by use of the verification protocol approved for this purpose by the Dutch minister of Economic Affairs and Climate Policy (minister of EZK).

1.2 The advisory commission sustainability biomass for energy applications

The independent advisory commission sustainability of biomass for energy applications (further in this document “commission” or “advisory commission” or “ADBE”) is installed by the Dutch government. The commission advises the minister of EZK on the extent to which certification schemes comply with the sustainability criteria in the Dutch legal ‘*regeling conformiteitsbeoordeling vaste biomassa voor energietoepassingen*’. The commission only gives advice on request of the minister, who receives applications for approval of certification schemes and has to decide on the approval. The minister of EZK will approve certification schemes per individual sustainability criterion, and will only approve schemes which address all management criteria. The use of a certification scheme leads to one or several claims (for instance the claim “SBP compliant biomass”). The ADBE will advise which Dutch sustainability criteria are covered by the claim of the scheme.

Energy companies can use the approved certification schemes and their claims to demonstrate that the solid biomass which they use complies with the Dutch legal sustainability criteria, either as “sustainable biomass” or as “controlled biomass”. Demonstrating compliance is a condition for receiving subsidy from the so-called [SDE+ subsidy scheme](#) for cofiring of solid biomass in coal-fired power stations or for the large-scale production of industrial steam from solid biomass. Certification schemes might not be approved for all sustainability criteria. In this case a combination of two or more certification schemes and/or a combination of certification and verification might be required to show compliance with all Dutch legal sustainability criteria.

1.3 Readers guide

In chapter 2 of this report the assessment procedure of the advisory commission plus the application by SBP and the timeline of the assessment are briefly explained. Chapter 3 gives a summary of the findings from the assessment by the commission for the certification scheme “Sustainable Biomass Program” (SBP). In chapter 4, details on the commission’s judgement are given, and chapter 5 lists the documents that were used when performing this assessment. This report comes with two annexes: the first annex gives background information on the requirements for biomass categories and the Chain-of-Custody (CoC) system from Dutch legislation, and the second annex lists the abbreviations that are used throughout this report.

2 The commissions' assessment procedure and assessment of SBP

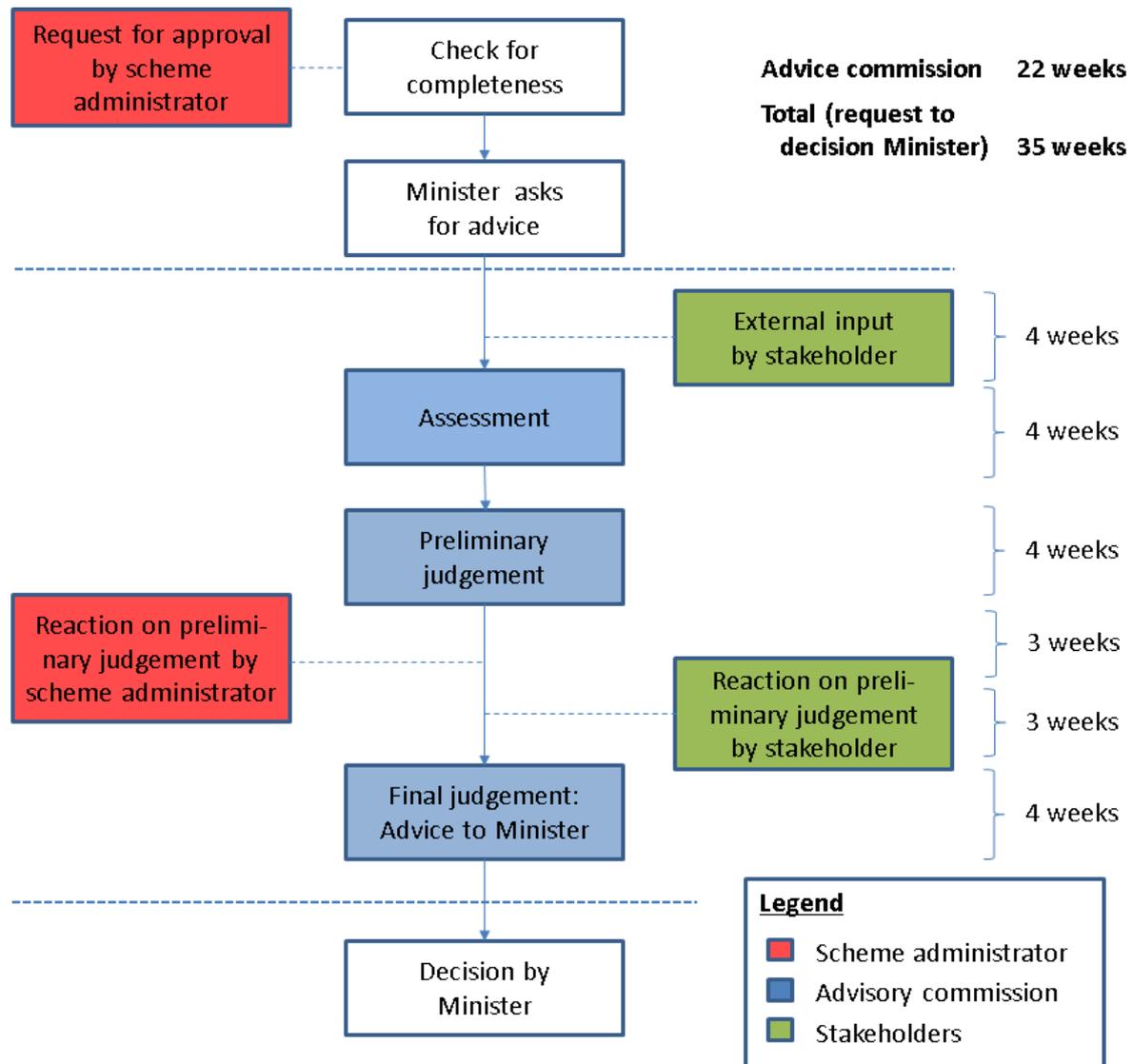
2.1 Assessment protocol

The assessment procedure of the advisory commission is described in a document called "toetsingsprotocol" (assessment protocol). The actual version of this protocol can be found on the [website of the advisory commission](#). The assessment protocol is available in Dutch language only. An English summary of the assessment procedure can be found on [this webpage](#).

The current application of the certification scheme SBP is assessed using version 2.2 of the assessment protocol.

2.2 Summary of the assessment procedure

Schematically the procedure is visualised in the figure below.



2.3 Application by SBP

The SBP scheme manager made an application in which approval of SBP is requested for:

- the Dutch sustainability criteria under Principles P1 - P11 for biomass categories 1, 2, 3, and 4;
- the Dutch sustainability criteria under Principle P13 for biomass categories 1, 2, 3, 4 and 5; and
- geographical coverage “Global”.

The SBP certification scheme generates two claims: “SBP-compliant biomass” and “SBP-controlled biomass”. In the application form, the SBP scheme manager indicated that the SBP chain of custody requirements include controlled biomass.

The current application is a follow-up of an earlier application that SBP submitted in April 2018 and on which the Dutch Minister of EZK decided on September 20, 2018 to approve SBP for sustainability criteria 12.1 – 12.6. As a result, the current advice is on a possible extension to the approval.

In addition to the scheme documents that were part of the earlier advice by the Commission (the documents listed in paragraph 2.3 of the commissions’ [SBP Public assessment report from September 2018](#)), the following scheme documents were used for the assessment of the application:

- Instruction document 2D: SBP Requirement for Group Schemes. Version 1.0 June 2018
- Instruction document 2D: SBP Requirement for Group Schemes. Version 1.1 November 2018
- Instruction document 3I: SBP Requirements for Certification Bodies Auditing SBP Group Schemes. Version 1.0 November 2018
- Instruction document 3I: SBP Requirements for Certification Bodies Auditing SBP Group Schemes. Version 1.1 December 2018

2.4 Timeline of the SBP assessment

The commission received a request for advice from the Minister of EZK on the SBP application on July 23, 2018. This was the third request for advice which the commission received on SBP. The first request for advice from August 2017 did not result in an advice as the SBP scheme manager has withdrawn this request for approval in February 2018. The second request for advice from April 2018 resulted in an advice from the commission in September 2018.

The commission completed its preliminary judgement on the July 2018 request for advice by mid-October 2018, and sent the preliminary judgement for comments to the scheme manager. On November 7, the assessment procedure was temporarily stopped as the SBP scheme manager sent in an updated version of instruction document 2D and the new instruction document 3I. The stopping of the assessment procedure was publicly announced in an ADBE news message.

The commission concluded on November 14th that the assessment procedure would be continued at the step “Reaction by stakeholders on the preliminary judgement” (see figure in paragraph 2.2). This was publicly announced in an ADBE news message.

On December 11, the SBP scheme manager sent in a new version of the SBP instruction document 3I. On December 12, the commission concluded that changes in this document were small and sent out a news message announcing the continuing of the procedure with this updated document. On December 12 the commission also discussed the stakeholder comments to the preliminary judgement and finally came to its final judgement as described in this report.

On December 17 the commission finalised its advice and sent it to the minister of EZK. The advice consists of a cover letter, this report and a stakeholder report.

2.5 External input

Stakeholders have been given the opportunity to submit external input to the commission during the first four weeks of the procedure (see also paragraph 2.2). This input plus a response by the commission formed the input for a separate stakeholder report. For the certification scheme SBP, external input from two (groups of) stakeholders was received.

3 Summary of findings on certification scheme SBP

A summary of the commission's findings on the application for approval by the certification scheme SBP (request for approval from July 2018) is given in the three paragraphs of this chapter 3. Details on the commission's findings are given in chapter 4 "Full assessment tables for certification scheme SBP". In chapter 4 reference is made to the "Dutch regulation", which is the Dutch *regeling conformiteitsbeoordeling vaste biomassa voor energietoepassingen*. The sustainability and management criteria referred to by the numbers in this chapter and listed in chapter 4 are copied from the Dutch regulation.

The commission's final judgement, based on the combined findings as described below, is that SBP can be approved for sustainability criteria 2.1, 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, 5.1, 6.1, 6.2, 6.3, 7.1, 7.2, 7.3, 7.4, 7.5, 8.1, 8.2, 8.3, 8.4, 8.5, 8.6, 8.7, 8.8, 9.1, 9.2, 10.1, 10.2, 10.3, 10.4, 10.5, 11.1, 11.2 (biomass categories 1, 2, 3 and 4) and for sustainability criteria 13.1, 13.2 and 13.3 (all biomass categories). This approval is additional to the approval for criteria 12.1 – 12.6 (all biomass categories) that SBP already received for an earlier application and applies for the same geographical coverage "global".

3.1 Findings on classification of biomass and on the first link in CoC to be certified

The commission has concluded that SBP certified companies can distinguish between the legal Dutch biomass categories.

SBP group certification is performed at the level of the biomass producer. The commission has noted that the group manager will audit the forest owners or managers (internal evaluation of the group). In addition, SBP requires that an independent conformity assessment body audits the group, which includes performing sample-wise conformity assessments of the group members at Forest Management Unit (FMU) level. The commission therefore concludes that SBP meets the requirement that conformity assessments start at the FMU.

3.2 Findings for management criteria

A certification scheme can only be approved if the scheme complies with all management criteria. The ADBE already concluded for the earlier application (April 2018) that the SBP scheme meets all management criteria.

The ADBE checked and concluded that SBP followed – when adding instruction documents 2D and 3I to its scheme – its own procedure for scheme development (for further details see paragraph 4.2).

3.3 Findings for individual sustainability criteria

The Minister of EZK will approve certification schemes per claim and per individual sustainability criterion from the Dutch legal legislation based on the advice by the commission. The commission has assessed compliance against the Dutch legal sustainability criteria for companies that are certified against SBP Instruction documents 2D "Requirements for Group Schemes" and 3I "SBP Requirements for Certification Bodies Auditing SBP Group Schemes". The commissions' finding on Dutch legal sustainability criterion 1.1. is based on the SBP claim "SBP-compliant biomass".

The table below summarises the findings of the advisory commission. This table does not show names or descriptions of the individual criteria, please refer to the table in paragraph 4.3 for further details. The green colour indicates the criteria for which the ADBE will give a positive advice to the Minister of EZK.

Principle	Number of the criterion as related to the respective principle to the left							
	1	2	3	4	5	6	7	8
P1: GHG emissions	*							
P2: Soil quality	**							
P3: Carbon sinks	**	**	**					
P4: Long-term carbon debt	**	**	**					
P5: Indirect Land Use Change (ILUC)	**							
P6: Laws and regulations	**	**	**					
P7: Carbon sinks	**	**	**	**	**			
P8: Regulating effect and quality, health and vitality of forest	**	**	**	**	**	**	**	**
P9: Production capacity, safeguard future of forests	**	**						
P10: Management system	**	**	**	**	**			
P11: Forest management by a group or regional association	**	**						
P12: Chain of custody system								
P13: Chain of custody system for a group	**	**	**					

*: Please note that the commission scores only the second part of criterion 1.1 as the first part cannot be complied with through certification, see also the text under criterion 1.1 in paragraph 4.3.

** : Compliance to these Dutch legal sustainability criteria is demonstrated by certification of the biomass producer against the optional SBP Instruction document 2D ‘SBP requirements for group schemes’.

Legend (scoring table)

Colour	Score	Meaning
Dark green :	3	The sustainability criterion is fully addressed by SBP.
Light green :	2	The sustainability criterion is largely addressed the SBP. Supplementary verification or another approved certification scheme is not needed.
Orange :	1	The sustainability criterion is partly addressed by SBP. Supplementary verification or another approved certification scheme is needed for those elements that are not addressed.
Red :	0	The sustainability criterion is not or is insufficiently addressed by SBP. Additional verification or another approved certification scheme is required for the entire sustainability criterion.
Purple :		These criteria were part of an earlier advice of the commission on SBP.

The commission underlines that compliance to these Dutch legal sustainability criteria is demonstrated by certification of the biomass producer against the optional SBP Instruction document 2D ‘SBP requirements for group schemes’ and by ensuring that the biomass is sourced from a member of the certified group managed by the biomass producer. The claim “SBP-compliant biomass” does not demonstrate compliance to these criteria, nor does the claim “SBP-controlled biomass”. As a result, the commission attaches the following three conditions to its advice that SBP addresses the Dutch legal sustainability criteria 2.1 – 11.2 and 13.1 – 13.3: (1) the biomass producer is certified against SBP instruction document 2D, (2) the biomass was sourced from a group member of the SBP group that is certified against instruction document 2D, and (3) that this (1 and 2) is registered in the SBP electronic Data Transfer System (DTS) so that this information is passed on through the chain-of-custody. The auditor of the Dutch end user shall check and confirm that this information is available. If this information is not available then the auditor shall not approve the biomass for compliance with these Dutch sustainability criteria based on SBP certification.

4 Assessment tables for certification scheme SBP

This chapter contains three paragraphs on respectively a number of general topics of the SBP application (4.1), on the management criteria (4.2), and on the sustainability criteria for the claim “SBP-compliant biomass” and for when using SBP instruction document 2D (4.3). The scores “3”, “2”, “1” and “0” plus the colours that are used in the tables in this chapter, are explained in the legend on the previous page.

4.1 Assessment of classification of biomass and on first link in CoC to be certified

Annex D of the Dutch regulation contains two tables (which are copied into Annex I of this report) with a number of general requirements on biomass categories and on the first link in the CoC to be certified. The ADBE has assessed whether SBP meets these requirements.

The current report is based on the SBP application for categories 1 – 5 and for sustainability criteria 1.1 – 11.2 and 13.1 – 13.3. As part of the earlier April 2018 request for advice the commission concluded that SBP certified companies can distinguish between the legal Dutch biomass categories as Instruction document 5D requires them to set up a mass balance account for each biomass category separately.

Annex D Table 2 of the Dutch regulation stipulates that conformity assessment must start at the FMU. SBP group certification is performed at the level of the biomass producer. The commission has noted that the group manager will audit the forest owners or managers (internal evaluation of the group). To the commissions’ opinion the SBP instruction document 2D alone will therefore not be able to demonstrate compliance with the requirement from Dutch legislation. Through the new SBP instruction document 3I SBP requires that an independent conformity assessment body audits the group, which includes performing sample-wise conformity assessments of the group members at FMU level. As a result, the commission concludes that SBP meets the requirement that conformity assessments starts at the FMU.

The commission also looked into the samples size to be taken when the auditor performs a sample-wise conformity assessment of FMU’s from group members. The commission concluded that the sample size of SBP (differentiated according to the size of the FMU) is in line with the sample size of other group certification schemes.

4.2 Assessment table for management criteria

The table below contains details of the assessment of the advisory commission on the SBP certification scheme against the Dutch management criteria from the “regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden”. The ADBE already concluded for the earlier application (April 2018) that the SBP scheme meets all management criteria. During the current assessment the ADBE checked whether SBP followed its own procedure.

Management criterion to be check by the ABDE (from the Dutch “regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden”)	ADBE judgement on whether SBP complies with the management criteria	Score
2 The development of the scheme is transparent and participation in the process of development of the scheme is open to anyone.	The commission has checked whether the SBP scheme manager followed its own procedures when updating the SBP certification scheme.	3

		<p>The commission learned that SBP Instruction Document 2D (ID2D) has been approved by the SBP stakeholder committee and that SBP has held a public consultation on this instruction document, see https://sbp-cert.org/documents/consultation-documents/instruction-document-2d. SBP did submit a request for approval on the basis of this ID2D before the consultation period ended. As there was no input to the consultation the commission concludes that this does not change the opinion of the commission on this procedure.</p> <p>The commission concludes that SBP did follow its own procedures as laid down in the SBP Standard-setting Procedure (version 1.0 – June 2018). Therefore, the commission concludes that SBP scheme manager followed its own procedures when updating the SBP certification scheme.</p>	
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4.3 Assessment tables on sustainability criteria for the claim “SBP-compliant biomass” and for SBP instruction document 2D

The Minister of EZK will approve certification schemes per claim and per individual sustainability criterion from the Dutch legal legislation based on the advice by the commission. The advisory commission has assessed compliance against the Dutch legal sustainability criteria for companies that are certified against SBP Instruction documents 2D “Requirements for Group Schemes” and 3I “SBP Requirements for Certification Bodies Auditing SBP Group Schemes”. The commissions’ finding on Dutch legal sustainability criterion 1.1. is based on the SBP claim “SBP-compliant biomass”.

The assessment results are given in the table below.

Two general comments			
0.1	<u>Copying Dutch criteria</u>	<p>The commission has observed that SBP uses exact copies of the text of the Dutch sustainability criteria as criteria in the SBP certification scheme (SBP instruction document 2D, Section 5).</p> <p>In case a certification scheme includes an exact copy of a Dutch criterion without additional indicators or further instruction on how the criterion is to be implemented, the commission is of opinion that the score can be “largely addressed” at best.</p> <p>The auditor, as part of the conformity assessment, can develop “Means of verification” which might be adapted to local circumstances and might hence be different in different conformity assessments. The auditor might make use of Locally Applicable Verifiers (LAVs) developed by the company to be certified. However, independent on whether or not the auditor makes use of the LAVs, the auditor must assess whether the requirements in section 5 and the definitions of section 6 of SBP instruction document 2D are complied with.</p>	
0.2	<u>Glossary of terms</u>	<p>SBP contains three places where a glossary of terms or definitions are given:</p> <ol style="list-style-type: none"> 1) The document SBP Glossary of Terms and Definitions (version 1.0, March 2015) that can be downloaded from https://sbp-cert.org/documents/standards-documents/glossary 2) The “Glossary of frequently used terms and abbreviations” on the SBP website at https://sbp-cert.org/sbp-framework/glossary-of-terms. This webpage tells “Please note this is a layman’s glossary of frequently used terms and abbreviations. The normative glossary of terms and definitions can be found here”, with “here” linking to the document mentioned under 1). 3) Chapter 6 of instruction document 2D contains Definitions. <p>The commission made a comparison between all definitions from the SBP Glossary of terms and SBP Instruction document 2D. When assessing an earlier version of ID2D, the commission concluded that there was a lack of alignment of and differences between definitions used in SBP standard 1 and used in SBP instruction document 2D.</p>	

		<p>In its update of ID2D (November 2018) SBP has added a second part to requirement 6.1 (the sentence “When .. all other SBP documents”):</p> <p>6.1 The following definitions are to be used in application of this Instruction Document. When applying the requirements of this Instruction Document the definitions in this section take precedence over those in all other SBP documents.</p> <p>As a result, there are now two possibilities:</p> <ol style="list-style-type: none"> 1. A company that is not certified for ID2D will have to use the definitions from the SBP Glossary of Terms and Definitions. 2. A company that is certified for ID2D will have to use definitions from Instruction Document 2D (plus definitions from the SBP Glossary of Terms and Definitions for the terms which are not defined in ID2D). <p>The commission therefore concludes that an earlier point of attention with definitions has been resolved.</p>
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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		
Sustainability criterion from the Dutch “regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden”	ADBE judgement on whether SBP complies with the sustainability criteria	Score
<p>1.1a 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.</p> <p>1.1b No consignment of biomass shall result in emissions above 74 g CO₂-eq/MJ for electricity and 32 g CO₂-eq/MJ for heat. 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.</p>	<p>Dutch sustainability criterion 1.1 consists of three parts:</p> <ul style="list-style-type: none"> • <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> <p>To the opinion of the commission 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. SBP does therefore not cover this part of the criterion.</p> <ul style="list-style-type: none"> • <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> <p>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.</p> <ul style="list-style-type: none"> • 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> <p>This part of the criterion is covered by SBP through Instruction document 6A section 2.2.</p> <p>The commission concludes that Dutch sustainability criterion 1.1 is partly addressed by SBP. This conclusion is made for the SBP claim (“SBP-compliant biomass”) and not for SBP instruction document 2D as this instruction document does not include requirements for GHG calculations.</p>	1

Principle 2: Soil quality shall be maintained and where possible improved			
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"		ADBE judgement on whether SBP complies with the sustainability criteria	Score
2.1	Best practices are applied for the maintenance or improvement of the soil and soil quality in relation to production, or the management objectives as these have been included in a management plan.	<p>SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2).</p> <p>As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).</p>	2**

Principle 3: Production of raw biomass does not result in the destruction of carbon sinks			
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"		ADBE judgement on whether SBP complies with the sustainability criteria	Score
3.1	Biomass is not sourced from permanently drained land that was classified as peat land on 1 January 2008, unless it can be demonstrated that the production and harvesting of the biomass does not result in water depletion of a previously undrained soil.	<p>SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2).</p> <p>As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).</p>	2**
3.2	Biomass is not sourced from land that was converted from wetland to an alternative, dryer ecosystem after 1 January 2008.	<p>SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2).</p> <p>As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).</p>	2**
3.3	Biomass is not sourced from wood plantations that were created by means of conversion of natural forests after 31 December 1997, unless the forest manager is not directly or indirectly responsible for the conversion. Biomass originating from wood plantations that were created after 1997 by means of conversion of degraded natural forests or degraded land is exempt from this requirement on condition that it is ecologically and economically justified to do so and that the forest manager is not directly or indirectly responsible for the degradation.	<p>SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2).</p> <p>As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).</p>	2**

Principle 4: The use of biomass does not result in a long-term carbon debt			
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"		ADBE judgement on whether SBP complies with the sustainability criteria	Score
4.1	The forest management unit where the wood is sourced is managed with the aim of retaining or increasing carbon stocks in the medium or long term.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**
4.2	Biomass is not sourced from stumps unless these stumps had to be removed from the site for other reasons than wood or biomass production.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**
4.3	On average less than half the volume of the annual round wood harvest from forests is processed as biomass for energy generation. Round wood from thinnings or from production forests with a rotation period of 40 years or less is exempt from this requirement.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**

Principle 5: Biomass production does not result in Indirect Land Use Change (ILUC)			
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"		ADBE judgement on whether SBP complies with the sustainability criteria	Score
5.1	Biomass sourced from bioenergy plantation systems that were planted after 1 January 2008 has a demonstrably low ILUC risk. Biomass from forest management units smaller than 500 hectares is exempt from this requirement.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria). Furthermore the commission is of opinion that as ILUC is a relatively new subject, indicators and/or a method to demonstrate compliance with this criterion should rather be developed or referred to by the certification scheme itself than by the group manager. This way better guidance can be given to the biomass producer / forest manager how the criteria can be met. However this is no reason for the commission to conclude that SBP does not comply with the criterion.	2**

Principle 6: Relevant international, national, regional and local laws and regulations are complied with			
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"		ADBE judgement on whether SBP complies with the sustainability criteria	Score
6.1	The forest manager holds the legal right to use the forest.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**
6.2	The forest manager complies with all obligations to pay taxes and royalties.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**
6.3	Anti-corruption legislation is complied with. If no anti-corruption legislation exists, the forest manager takes alternative anti-corruption measures proportionate to the scale and intensity of the management activities and the risk of corruption.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**

Principle 7: Biodiversity is maintained and where possible enhanced			
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"		ADBE judgement on whether SBP complies with the sustainability criteria	Score
7.1	Sites with a high conservation value and representative areas of the forest types that are found in the forest management unit have been identified and are protected and where possible enhanced. The sites may contain one or more of the following values: diversity of species, ecosystems and habitats, ecosystem services, ecosystems at landscape level and cultural values.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**
7.2	Measures have been taken to protect endangered plant and animal species and, if applicable, to increase the populations and enhance the habitats	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2).	2**

	of these species.	As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	
7.3	<p>The conversion of forests within the forest management unit to other forms of land use, including wood plantations, is not permitted unless:</p> <ul style="list-style-type: none"> - the area concerned is small which means the total converted area over the years is no greater than 5% of the area of the forest management unit on benchmark date 1 January 2008; and - it clearly leads to long-term advantages for nature conservation; and - there is no damage or threat of damage to sites with a high conservation value. 	<p>SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2).</p> <p>As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).</p>	2**
7.4	In the case of wood plantations, there is a preference for native species, and a relevant percentage of the plantation must be able to revert to natural forest at a later stage.	<p>SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2).</p> <p>As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).</p>	2**
7.5	Exploitation of non-timber forest products, including products from hunting and fishing, is regulated, monitored and controlled, among others to safeguard the maintenance of the biodiversity in the forests.	<p>SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2).</p> <p>As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).</p>	2**

Principle 8: The regulating effect and the quality, health and vitality of the forest are maintained and where possible enhanced

	Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"	ADBE judgement on whether SBP complies with the sustainability criteria	Score
8.1	The soil quality of the forest management unit is maintained and if necessary improved, with special attention to coasts, river banks, erosion-sensitive areas and sloping landscapes.	<p>SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2).</p> <p>As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).</p>	2**
8.2	The water balance and quality of both groundwater and surface water in the forest management unit and downstream outside the forest management unit are at least maintained and where necessary improved.	<p>SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2).</p> <p>As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).</p>	2**

8.3	Important ecological cycles present in the forest management unit are preserved, including carbon and nutrient cycles.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**
8.4	Unnecessary damage to ecosystems is prevented by applying <i>reduced impact logging</i> and the most suitable road construction methods and techniques for local conditions.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**
8.5	If fires are used to achieve forest management objectives, such as regeneration of specific tree species, then adequate control measures have been taken.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**
8.6	The forest management measures are designed to prevent and control diseases and pests where these form a threat to natural capital.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**
8.7	The use of chemicals is only permitted if ecological processes and the optimal deployment of sustainable alternatives prove insufficient. Pesticides classified as Type 1A and 1B by the World Health Organisation and chlorinated hydrocarbons are not permitted.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**
8.8	The accumulation of inorganic waste and litter is prevented or such waste and litter is collected, stored in approved areas and disposed of responsibly.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**

Principle 9: The production capacity for wood products and relevant non-timber forest products is maintained in order to safeguard the future of the forests

Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"		ADBE judgement on whether SBP complies with the sustainability criteria	Score
9.1	The production capacity of all forest types represented in the forest management unit is	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system	2**

	maintained.	meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	
9.2	The forest management unit is sufficiently protected against all forms of illegal exploitation of timber and non-timber forest products, including hunting and fishing, illegal establishment of settlements, illegal land use, illegally initiated fires and any other illegal activities.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**

Principle 10: Sustainable forest management is achieved through a management system			
	Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"	ADBE judgement on whether SBP complies with the sustainability criteria	Score
10.1	The forest management system is designed to achieve the objectives of a forest management plan and covers the inventory, analysis, planning, implementation, monitoring, evaluation and adjustment cycle.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**
10.2	A forest management plan is drawn up that at least includes: <ul style="list-style-type: none"> - a description of the current condition of the forest management unit; - long term goals for the ecological functions of the forest management unit; - the annual allowable cut per forest type and, if applicable, the annual allowable harvest of non-timber forest products based on reliable and current data; - budget planning for the implementation of the forest management plan. 	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**
10.3	Essential elements for the management of the forest are indicated on maps.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**

10.4	The implementation of the forest management plan is periodically monitored and the ecological effect of the forest management is evaluated.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**
10.5	The forest management is implemented by professional office and field staff, whose expertise and knowledge is maintained by means of an effective and regular training programme.	SBP has copied this Dutch sustainability criterion into instruction document 2D. Compliance with this criterion depends on the SBP group certification system. The commission concludes that the SBP group certification system meets the Dutch legal requirements on group certification (see also the commissions' judgement under criteria 11.1 and 11.2). As a result, the commission concludes that SBP largely addresses this sustainability criterion (see also general comment 0.1 on copying Dutch criteria).	2**

Principle 11: Forest management by a group or regional association offers sufficient safeguards for sustainable forest management

Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"		ADBE judgement on whether SBP complies with the sustainability criteria	Score
11.1	A group or regional association is led and supervised by an independent legal entity.	<p>Principle 11 requires that forest management by a group or regional association offers sufficient safeguards for sustainable forest management. A "group or regional association" is defined as (translated definition from Dutch legal regulation) "a legal entity involving several forest managers who cooperate in a certain area, or companies that work together in a certain segment of the Chain of Custody". Principle 11 itself reads "Principle 11: Forest management by a group or regional association offers sufficient safeguards for sustainable forest management", which makes clear that a group as referred to under criterion 11.1 is a group of several forest managers.</p> <p>The commission makes the following observations:</p> <ul style="list-style-type: none"> • In the case of SBP group scheme certification based on ID2D, the Group Manager is an SBP certified Biomass Producer and a group member is a forest owner or forest manager who participates in the group scheme. The group meets the Dutch definition, as the members are all forest managers or forest owners. The commission is of opinion that the Dutch legislation does not include the requirement that the group leader represents also an FMU. • The commission is of opinion that a pellet mill owner leading a group of forest owners and forest managers that supply the biomass to his pellet mill, can form a potential conflict of interest. However, Dutch legislation allows a pellet mill owner to take this role. The commission is also of opinion that the risk (formed by the potential conflict of interest) is limited through independent auditors performing conformity assessments at Group Members (FMU) level. • Still the Group Manager needs sufficient knowledge and expertise to ensure that the Dutch requirements for sustainable forest management are met by the group. Instruction document 2D contains two paragraphs that are directed towards this requirement. Paragraph 1.12 stipulates that "The Group Manager shall define the competence requirements for personnel managing the group scheme, including those required for developing the LAV's and conducting the annual audit of Group Members" and paragraph 1.13 requests that the "Group Manager shall ensure that personnel is competent for the tasks they perform". • According to ID2D the Group Manager shall be an SBP certified Biomass Producer holding a valid SBP certificate which includes Standard 2 in its scope (responses by mail indicate that this should also include standards 4 and 5). The Dutch sustainability criterion 11.1 requires that a group or regional association is lead and supervised by 	3**

		<p>an independent legal entity. SBP (through ID2D 1.1a) requires that the group manager is a legal and independent entity, and is responsible for the group as a whole.</p> <ul style="list-style-type: none"> • The commission understands that the SBP claim "SBP-compliant biomass" will be used both for biomass delivered by a company certified for SBP standard 1, as well as for companies certified for both SBP Standard 1 and for SBP instruction document 2D. The group certification as defined in instruction document 2D is an optional, extra set of requirements that can be added to the claim "SBP-compliant biomass". In instruction document 2D SBP requires that "2.5 The Group Manager shall register in the DTS when biomass is produced from feedstock supplied via a Group Scheme meeting the requirements of this SBP Instruction Document, 2D". As a result, an end user (and his/her auditor that is to prepare a conformity year statement) will know – when biomass is received with the claim "SBP-compliant biomass" – that SBP instruction document 2D was used. • Instruction Document 2D point 4.1 requires biomass producers to prepare Locally Applicable Verifiers (LAVs) for each indicator of the SDE+ sustainability requirements by applying the SBP requirements in Instruction Note 1A. The requirements in this instruction note refer to SBP standard 1 (see also general point 0.2). The LAVs are used for an evaluation (internal in the group) by the group leader. The independent (third party) external auditor, when performing a conformity assessment at sampled group members, will make an evaluation against the Dutch legal criteria (as copied into indicators into section 5 of SBP instruction document 2D). In case the LAVs are to the opinion of the auditor not sufficient, then the auditor can add additional Means of verification. <p>The commission concludes, based on the observations given above, that SBP fully addresses Dutch sustainability criterion 11.1.</p>	
11.2	A group or regional association meets the requirements of sustainable forest management (requirements 6.1 through 10.5). The separate forest management activities of the individual members of the group or regional association shall also meet these requirements if applicable for the management of the forest concerned.	SBP instruction document 2D contains a requirement that individual forest owners shall meet the criteria of sustainable forest management (including the "SDE+ Sustainability requirements" and the "SDE+ Chain of Custody requirements"), and SBP instruction document 3I defines how the annual audit by an external conformity assessment body must be performed, including taking samples of group members and performing conformity assessment activities at FMU level. The commission concluded that the sample size applied by SBP (differentiated according to the size of the FMU) is in line with the sample size of other group certification schemes. As a result, the commission concludes that Dutch sustainability criterion 11.2 is fully addressed by SBP.	3**

Principle 13: In case of a group management system for the chain of custody the same requirements apply to the group as a whole as to individual businesses

Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"		ADBE judgement on whether SBP complies with the sustainability criteria	Score
13.1	A group is led by a legal entity that is responsible for the group as a whole. This entity uses a management system as well as technical and human resources that enable it to supervise the participating locations within the scope of the system. The entity conducts an annual audit of a sample of the affiliated group members.	<p>ID2D clause 1.1 stipulates that the Group Manager shall be an independent legal entity or an individual acting as a legal entity. ID2D clause 1.12 and 1.13 stipulate that the Group Manager shall define the competence requirements for personnel managing the Group Scheme and shall ensure that personnel are competent.</p> <p>The Group Manager shall use a management system as well as technical and human resources that enable him/her to supervise the participating locations within the scope of the Group System (1.8). There are no further specifications on how such a management system should look like.</p> <p>According to ID2D clause 1.9, the Group Manager shall conduct an annual audit of a sample of the Group Members. In addition, an annual audit by an independent external auditor is required. SBP instruction document 3I contains instructions on how this independent annual audit shall be performed, including requirements on taking a sample of</p>	3**

		<p>FMU's to be assessed by the independent auditor and requirements for what to do in case of non-conformity.</p> <p>The commission concludes that Dutch sustainability criterion 13.1 is fully addressed by SBP.</p>	
13.2	<p>The group applies to the requirements 12.1 up to and including 12.6. Furthermore, each group member individually meets these requirements insofar as applicable to their own activities.</p>	<p>SBP ID2D clause 1.6 reads "The forest management activities of each Group Members shall also meet the requirements set out in this Instruction Document insofar as applicable to each Group Member. These include the SDE+ Sustainability requirements and the SDE+ Chain of Custody requirements". This is also declared in a declaration submitted by each group member (ID2D 1.11).</p> <p>As the result of an earlier request for approval, SBP has been approved for criteria 12.1-12.6 on the basis of certification against (amongst others) SBP instruction document 5D which causes that specific information (relevant in the Dutch context) is put into the SBP Data Transfer System (DTS). SBP group members (forest managers) will not be certified, nor will be required by SBP to use the DTS system and meet requirements from SBP Instruction document 5D. SBP group members are obliged to meet the requirements from Dutch criteria 12.1-12.6 (insofar applicable to their own activities) through ID2D 1.6 and ID2D Chapter 3. Instruction document 3I sets out the requirements for external auditing, which includes auditing group members and includes auditing whether group members comply with CoC requirements.</p> <p>As a result, the commission concludes that Dutch sustainability criterion 13.2 is fully addressed by SBP.</p>	3**
13.3	<p>The group leader uses a registration system to record:</p> <ul style="list-style-type: none"> - the names and addresses of the members; - a declaration submitted by each member in which they declare that they meet chain of custody system requirements; - incoming and outgoing consignments of each individual group member. 	<p>SBP requires, through ID2D clauses 1.10 and 1.11, that the group manager uses a registration system to record the names and addresses of the members, a declaration submitted by each member and the incoming and outgoing consignments of each individual group member. The commission therefore concludes that Dutch sustainability criterion 13.3 is fully addressed by SBP.</p>	3**

Footnote to all the scores with “**” above: Compliance to these Dutch legal sustainability criteria is demonstrated by certification of the biomass producer against the optional SBP Instruction document 2D ‘SBP requirements for group schemes’ and by ensuring that the biomass is sourced from a member of the certified group managed by the biomass producer. The claim “SBP-compliant biomass” does not demonstrate compliance to these criteria, nor does the claim “SBP-controlled biomass”. As a result, the commission attaches the following three conditions to its advice that SBP addresses the Dutch legal sustainability criteria 2.1 – 11.2 and 13.1 – 13.3: (1) the biomass producer is certified against SBP instruction document 2D, (2) the biomass was sourced from a group member of the SBP group that is certified against instruction document 2D, and (3) that this (1 and 2) is registered in the SBP electronic Data Transfer System (DTS) so that this information is passed on through the chain-of-custody. The auditor of the Dutch end user shall check and confirm that this information is available. If this information is not available then the auditor shall not approve the biomass for compliance with these Dutch sustainability criteria based on SBP certification.

5 Documents used for the assessment of certification scheme SBP

The following documents have been used for the assessment of certification scheme SBP.

5.1 Documents submitted by the scheme manager as part of the request for approval

1. [SBP Standard 1: Feedstock Compliance Standard](#). Version 1.0 March 2015
2. [SBP Standard 2: Verification of SBP-compliant Feedstock](#). Version 1.0 March 2015
3. [SBP Standard 3: Certification Systems. Requirements for Certification Bodies](#). Version 1.0 March 2015
4. [SBP Standard 4: Chain of Custody](#). Version 1.0 March 2015
5. [SBP Standard 5: Collection and Communication of Data](#). Version 1.0 March 2015
6. [SBP Standard 6: Energy and Carbon Balance Calculation](#). Version 1.0 March 2015
7. [SBP Glossary of Terms and Definitions](#). Version 1.0 March 2015
8. [Instruction document 2D: SBP Requirement for Group Schemes](#). Version 1.0 June 2018
9. [Instruction Document 5A: Collection and Communication of Data](#). Version 1.1 October 2016
10. [Instruction Document 5B: Energy and GHG Data](#). Version 1.1 October 2016
11. [Instruction Document 5C: Static Biomass Profiling Data](#). Version 1.1 October 2016
12. [Instruction Document 5D: Dynamic Batch Sustainability Data](#). Version 1.1 March 2018
13. [Instruction Document 6A: Energy and Carbon Balance Calculation for the Netherlands](#). Version 1.0 March 2015
14. [SBP - Normative Interpretations](#). December 2017

5.2 Documents submitted by the scheme manager during the assessment procedure

15. [Instruction document 2D: SBP Requirement for Group Schemes](#). Version 1.1 November 2018
16. [Instruction document 3I: SBP Requirements for Certification Bodies Auditing SBP Group Schemes](#). Version 1.0 November 2018
17. [Instruction document 3I: SBP Requirements for Certification Bodies Auditing SBP Group Schemes](#). Version 1.1 December 2018

5.3 Additional documents assessed by the commission

18. [SBP Standard setting procedure](#) version 1.0 June 2018
19. Setting Social and Environmental Standards – ISEAL Code of Good Practice (Version 6.0, December 2014)

5.4 Additional documents provided by stakeholders as part of their external input

20. Evans, A., Perschel, R., Kittler, B. 2009. Revised Assessment of Biomass Harvesting and Retention Guidelines. http://www.forestguild.org/publications/research/2009/biomass_guidelines.pdf
21. Pinchot Institute for Conservation, Rees, B. 2017. The Synapses Are Firing. <http://conservefish.org/2017/01/05/the-synapses-are-firing/>
22. Booklet compiling years of on-the-ground investigations into biomass harvesting to source Enviva in the U.S. Southeast: <https://www.nrdc.org/sites/default/files/european-imports-wood-pellets-greenenergy-devastating-us-forests.pdf>
23. Link to UK Channel 4 News Dispatches clip: <https://www.facebook.com/Channel4News/videos/10155880285306939/>

24. Booth, M. 2018. Not carbon neutral: Assessing the net emissions impact of residues burned for bioenergy. Environmental Research Letters. <http://iopscience.iop.org/article/10.1088/1748-9326/aaac88>
25. Colnes, A., Doshi, K., Emick, H., Evans, A., Peerschel, R., Robards, D., Saah, D., Sherman, A. 2012. Biomass Supply and Carbon Accounting for Southeast Forests. http://international.nwf.org/publication-items/biomass-supply-carbon-accounting-for-se-forests-2012/?_ga=2.268049482.533105006.1534536324-301880898.1504618442
26. ISEAL Alliance. 2018. Assuring Compliance with Social and Environmental Standards: ISEAL Code of Good Practice. Version 2.0. https://www.isealalliance.org/sites/default/files/resource/2018-02/ISEAL_Assurance_Code_Version_2.0.pdf
27. ISEAL Alliance. 2018. Benchmarking Sustainability Standards Systems. <https://www.isealalliance.org/sustainability-news/benchmarking-sustainability-standards-systems>
28. WWF, EPFL, Ecofys. 2013. The Low Indirect Impact Biofuels (LIIB) Methodology. <https://www.ecofys.com/files/files/ecofys-epfl-wwf-2013-credible-robust-certification-of-low-iluc-biofuels.pdf>

Annex I – Biomass categories and the CoC system

The sustainability and management criteria in paragraphs 4.2 and 4.3 are a translation from the criteria in Annexes B and C of the Dutch regulation on conformity assessment of solid biomass for energy production . In Annex D of this regulation two tables show which requirements apply to the five categories and the set-up of the chain of custody. In the explanatory notes to the legislation a table can be found with additional guidance to the requirements.

Biomass categories and the chain of custody system

There are five biomass categories for which the sustainability requirements apply. In Table 1 for each category is listed which sustainability requirements apply:

Table 1. Biomass category’s with the applicable sustainability requirements

Category	Sustainability requirements	Greenhouse gas emission	Soil management	Carbon and land use change	Sustainable forest management	Chain of custody
1. Woody biomass from forest management units		1.1		3.1-3.3, 4.1-4.3, 5.1	6.1-6.3, 7.1-7.5, 8.1-8.8, 9.1-9.2, 10.1-10.5, 11.1-11.2	12.1-12.6, 13.1-13.3
2. Woody biomass from forest management units less than 500 ha		1.1		3.1-3.3, 4.1-4.3	6.1-6.3, 7.1-7.5, 8.1-8.8, 9.1-9.2, 10.1-10.5, 11.1-11.2	12.1-12.6, 13.1-13.3
3. Residues from nature and landscape management		1.1	2.1			12.1-12.6, 13.1-13.3
4. Agricultural residues		1.1	2.1			12.1-12.6, 13.1-13.3
5. Biogenic residues and waste		1.1				12.1-12.6, 13.1-13.3

The source of the five categories and controlled biomass has to be known for each consignment. The conformity assessment by a conformity assessment body starts at the first link of the chain of custody. In Table 2 for each category the source of the material and the first link of the chain of custody are listed.

Table 2. Distinction between the source and the first link in the chain of custody per biomass category

Category	Source	First link chain of custody
1. Woody biomass from forest management units	Forest management unit	Forest management unit
2. Woody biomass from forest management units less than 500 ha	Forest management unit or predefined supply base of which the forest management unit <500 ha forms a part	Forest management unit or biomass producer
3. Residues from nature and landscape management	Predefined supply base	First collection point
4. Agricultural residues	Predefined supply base	First collection point
5. Biogenic residues and waste	Company that generates the residues or waste	First collection point

As part of the SDE+ subsidy scheme a temporary exemption applies for category 2 biomass regarding the first link of the chain of custody. For this category either the forest management unit or the biomass producer can be the first link. In case the biomass producer is the first link a risk based approach is used to demonstrate compliance with the sustainable forest management requirements.

Annex II – Abbreviations

ADBE	Advisory commission Sustainability Biomass for Energy applications
CoC	Chain-of-Custody
DTS	Data Transfer System
EU	European Union
EZK	“Ministry of EZK” is the Dutch Minister of Economic Affairs and Climate Policy
FMU	Forest Management Unit
GHG	GreenHouse Gas
ID2D	Instruction Document 2D
ILUC	Indirect Land Use Change
LAVs	Locally Applicable Verifiers
SBP	Sustainable Biomass Program
SDE+	A Dutch subsidy scheme (feed-in tariff) for production of renewable energy