



Standards Document

# SBP Standard 2: Feedstock Verification

**Sustainable Biomass Program**

[sbp-cert.org](http://sbp-cert.org)



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

SBP welcomes comments and suggestions for changes, revisions and/or clarifications on all of its Standards documentation. Please contact: [info@sbp-cert.org](mailto:info@sbp-cert.org)

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## A Introduction

The Sustainable Biomass Program (SBP) is a *certification scheme* designed for *biomass*, mostly in the form of wood pellets and chips.

The SBP *certification scheme* provides *assurance* to *stakeholders* that *biomass* is sourced both legally and sustainably, and it provides a means to collect and communicate reliable and verified data throughout the supply chain, including energy data, allowing companies in the *biomass* sector to demonstrate their responsible sourcing achievement and compliance with regulatory requirements and to calculate their Greenhouse Gas (GHG) footprint.

There are six SBP Standards, which collectively represent the SBP *certification scheme*, against which *Organisations* can be assessed for certification by independent third-party accredited *Certification Bodies (CBs)*. The Standards were developed and revised following a rigorous process aligned with ISEAL Standard-Setting Code of Good Practice, considering and building on existing regulatory requirements, peer voluntary certification standards and *stakeholders'* input.

An *Organisation* that satisfactorily demonstrates *conformance* with applicable SBP Standards receives a certificate and may be entitled to make use of the *SBP Data Transfer System (DTS)* and *SBP claims* in relation to the *biomass* it produces, sells, buys and/or uses.

## B Purpose

The SBP *certification scheme* provides *assurance* to *End-users* that the *biomass* is sourced from legal and sustainable *feedstock*, as defined in SBP Standard 1. SBP certification relies on a third-party, independent certification process carried out by accredited *CBs*.

SBP Standard 2 sets out the requirements for *Biomass Producers (BPs)* to identify, evaluate and mitigate the risks of sourcing *feedstock*, for the purposes of *biomass* production, that does not conform with the criteria set in SBP Standard 1. *Risks* are rated as 'low' or 'specified'. *Organisations* need to ensure that all *specified risks* are managed and thus reduced to a low level, or otherwise exclude the *feedstock* associated with *specified risks* from SBP supply chains.

The SBP Standards are not meant to replace forest management *certification schemes*. Rather, the SBP Standards aim to support *BPs* in identifying sustainability *risks* when designing their sourcing policies and actions to mitigate *specified risks*. The SBP Risk Management System acknowledges the synergies with recognised existing forest management *certification schemes* to adequately manage *risks* in the *Supply Base*. Such that *Risk Management* is adapted for *feedstock* that is certified by *SBP-recognised* and *SBP-benchmarked* schemes.

The SBP *certification scheme* follows a risk-based approach. *BPs* assess the *risk* of *non-conformance* against the principles and criteria of SBP Standard 1, when deciding which *feedstock* to source for *biomass production*. Using SBP Standard 2, *BPs* will identify, evaluate and adequately mitigate the *risks* of sourcing *feedstock*, for the purposes of *biomass production*, that does not comply with the criteria set in SBP Standard 1.

Risks are rated as 'low' or 'specified'. *Organisations* need to ensure that all *specified risks* are managed and thus reduced to a 'low' level or otherwise exclude the *feedstock* associated with *specified risks* from SBP supply chains.

*Organisations* gain certification against SBP Standard 2 by conforming with the requirements set in SBP Standard 1 and demonstrating that any *specified risks* of sourcing *feedstock* not in *conformance* with SBP Standard 1 have been adequately reduced to *low risk*, following Standard 2 requirements.

Once granted a certificate, an *Organisation* is entitled to use the *SBP-compliant* and/or *SBP-controlled* claims, provided the *SBP-certified* management system is implemented during production. *Organisations* must use the *DTS* to pass those claims down the supply chain, in *conformance* with the requirements set in SBP Standard 4. The *Organisation* will also collect the data required by SBP Standards 5 and 6 and use the *DTS* to communicate all data to their customers.

## C Scope

SBP Standard 2 is for use by *Organisations* defined as *BPs* and is aimed at sourcing *feedstock* from a defined *Supply Base* and selling *biomass* with a *SBP claim*. The *Organisation* shall also be certified against SBP Standards 4 and 5.

## D How to use this document

SBP Standard 2 sets out the requirements for *Organisations* to define their *Supply Base*, identify and rate the *risks* that *feedstock* sourced from the *supply base* is not in *conformance* with the requirements set in SBP Standard 1 and define and implement mitigation measures to effectively reduce *specified risks* to a 'low' level. SBP Standard 2 also includes requirements for *Organisations* to consult *stakeholders* and report on their findings.

The following terms are used by SBP in its normative documents to indicate requirements, recommendations, permissions, and possibilities or capabilities:

“shall” indicates a requirement,

“should” indicates a recommendation,

“may” indicates a permission, and

“can” indicates a possibility or a capability.

SBP Standard 2 may be accompanied by guidance published from time-to-time by SBP to support the implementation of the requirements.

The *Organisation* shall also refer to the SBP Instruction Documents and/or Normative Interpretations related to SBP Standard 2 as published by SBP.

The *CB* will evaluate conformance of the *Organisation* against SBP Standard 2 using the general certification rules set in SBP Standard 3.

## E Normative references

SBP Standard 1: Feedstock Compliance

SBP Standard 3: Requirements for Certification Bodies

SBP Standard 4: Chain of Custody

SBP Standard 5: Collection and Communication of Data

SBP Standard 6: Energy and Carbon Balance Calculation

## F Glossary of terms and definitions

Please refer to separate SBP Glossary of Terms and Definitions document. Defined terms are shown in italics in each instance where the definition applies.

## 1 Supply Base Definition and Mapping

**1.1** The *Organisation* shall define the boundaries of its *sourcing areas* and map its *Supply Base*, in accordance with the following:

- 1.1.1** The *Organisation* shall include the *sourcing areas* for all *feedstock* (including geographical boundaries) that are currently used and intended to be used in the production of *SBP-certified biomass*.
- 1.1.2** The *Organisation* shall include which *feedstock category* is being sourced.
- 1.1.3** The *Organisation* shall include a description of all *operators* involved in the production, harvesting and transport of *feedstock* and having an impact on *conformance* with SBP standards, including at least the following:
- company names,
  - addresses of operating sites,
  - key contact person,
  - status of certification against *SBP-recognised* scheme (where relevant), and
  - stages within the *feedstock* supply chain from the *sourcing area* up to and including the *Organisation's* own operations.
- 1.1.4** The *Organisation* shall ensure the boundaries and the map of the *Supply Base* remain up-to-date.

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- 1.1.5** If any *sub-scopes* are defined these shall be described, mapped, and justified.
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- 1.1.6** The *Organisation* shall keep records of *feedstock* inputs as required in SBP Standard 4.
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- 1.1.7** The records of *feedstock category* inputs shall show the relative volumes of different *feedstock* inputs used.
- 1.1.8** The records of *feedstock* inputs shall include identification of volumes of *Primary feedstock*, *Processing residues* and *post-consumer feedstock* used, and a description of the inputs, including species for the *primary feedstock* and, if known, for *processing residues feedstock*.
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- 1.1.9** The *Organisation* shall record the relative portions and volumes of its *feedstock*, as coming from:
- a. *Regional Risk Assessment (RRA)* with all *low risks*,
  - b. *RRA* with some *specified risks*,
  - c. *Biomass Producer's Supply Base Evaluation (SBE)*,
  - d. Certified sources against an *SBP-recognised certification scheme* as published by SBP.

## 2 Traceability to the Supply Base

- 2.1** The *Organisation* shall ensure that all sourced *feedstock* can be traced back to the defined *Supply Base*. To do so, the *Organisation* shall ensure that the *sourcing area* is within the defined *Supply Base*.
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- 2.2** The *Organisation* shall have access to records describing the *sourcing area* of all *feedstock*, and whether *feedstock* sourced is certified against an *SBP-recognised scheme* or the area is covered by a valid SBP-endorsed *RRA*, if relevant.
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- 2.3** When an *Organisation* is sourcing *post-consumer feedstock* it shall implement and comply with the requirements defined in Annex 1: SBP processing residues and post-consumer feedstock requirements.

### 3 Supply Base Evaluation (SBE)

3.1 The *Organisation* shall develop, implement, and maintain an *SBE* unless exempted per the table in 3.2 below.

#### Options for the applicability of the standard

3.2 The *Organisation* shall identify the applicable requirements of this Standard using the following table:

Feedstock category	+ certification status	= SBP Standard 2 conformance requirements (with options where applicable)
<b>For SBP-compliant claims</b>		
<b>Primary</b>	Not certified to an <i>SBP-benchmarked certification scheme</i>	<i>SBE + Risk Management for specified risks</i> OR <i>RRA + Risk Management for specified risks</i>
	Certified to an <i>SBP-benchmarked certification scheme</i>	<i>SBE + Risk Management for specified risks*</i> OR <i>RRA + Risk Management for specified risks*</i> <i>*The Organisation may consider requirements of the SBP-recognised certification scheme as a potential RMM</i>
<b>Processing residues</b>	Not certified to an <i>SBP-recognised certification scheme</i>	Evidence to prove ' <i>processing residues</i> ' feedstock category, AND <i>SBE + Risk Management for specified risks</i> OR <i>RRA + Risk Management for specified risks</i>
	Certified to an <i>SBP-recognised certification scheme</i>	Evidence to prove ' <i>processing residues</i> ' feedstock category, and that the feedstock is certified by an <i>SBP-recognised certification scheme</i>
<b>Post-consumer</b>	n/a	Evidence to prove ' <i>post-consumer</i> ' feedstock category (No <i>SBE</i> , <i>RRA</i> nor other certification required)
<b>For SBP-controlled claims</b>		
<b>Primary and/or Processing residues</b>	Certified to an <i>SBP-recognised controlled scheme</i>	Evidence to prove ' <i>Processing residues</i> ' feedstock category AND evidence that the feedstock is certified by an <i>SBP-recognised controlled scheme</i>



- 3.3** Depending on the source of *feedstock*, the *Organisation* shall develop and implement: all, parts or none, of the elements of an *SBE* in accordance with the following:
- a. *Supply Base Verifiers (SBVs)* (see section 5 below) and/or
  - b. *Risk Assessment and Risk Ratings* (see section 6 below) and/or
  - c. *Risk Management Plan (RMP)* containing *Risk Management Measures (RMM)* (see section 7 below).

### General provisions

- 3.4** The *Organisation* shall identify any Indicator within Standard 1 that may conflict with *applicable legislation* (national and sub-national) in the *Supply Base*, and evaluate any effects on certification, in discussion with the affected parties. If the Standards and *applicable legislation* conflict, the *Organisation* shall seek ways to honour the Principles of the Standard wherever possible. Where the domestic context renders it impossible to meet this responsibility fully, *Organisations* shall respect the Principles of the Standard to the greatest extent possible in the circumstances and shall demonstrate their efforts in this regard without contravening laws, regulations or court decisions.

Note: Conflicts are considered to exist where a legal obligation prevents the implementation of some aspect of the Standard. A conflict is not considered to exist if the requirements of the Standard exceed the minimum requirements for legal compliance.

- 3.5** The *Organisation* shall establish *sub-scopes* where the *risks of non-compliance* with Standard 1 are not homogeneous within the *Supply Base*. The *sub-scopes* shall be defined as geographical areas or otherwise clearly delineated separate sources of *feedstock* within the *Supply Base*, where the *risks* are uniform.

- 3.6** The *Organisation* shall establish a process to ensure that the *SBE* is kept up to date.

**3.6.1** The *Organisation* shall keep record of any changes in the *Supply Base* or supply chain and how these changes may affect the *Risk Assessment* conclusions.

**3.6.2** If these changes affect the *Risk Assessment* conclusions, the *Organisation* shall alter the required *RMP* of an *SBE*, which shall result in an immediate review and, if deemed necessary, revision of the *SBE* by the *Organisation*. Such changes may include, but are not limited to:

- new legislation and/or jurisdictional changes,
- new *feedstock* sources being proposed,
- new *suppliers* and/or *contractors* being used,
- identification of new sustainability issues relevant to the SBP Standard, and
- failure of any *RMM* within the *RMP* to address the *specified risks*.

**3.6.3** The *Organisation* shall review and revise its *SBE* at least every five (5) years.

### Competence to undertake Supply Base Evaluations

- 3.7** The *Organisation* shall establish a process for selecting and appointing an entity or individual(s) with the required competences, per 3.8, to undertake the *SBE*.
- 3.8** The *Organisation* shall ensure that the entity or individual(s) undertaking the *SBE* has/have and can demonstrate the necessary competence, knowledge, and experience to evaluate the *Organisation's Supply Base* and associated supply chains against SBP Standard 1, including but not limited to the following:
- ecological and social values,
  - *applicable laws* and regulations,
  - business management practices,
  - the operation of *suppliers* and *contractors*, including management systems and products,
  - SBP requirements,
  - *Due Diligence Systems (DDS)*,
  - appropriate language(s) for all *stakeholders*,
  - note-taking and report-writing,
  - *stakeholder engagement*.

### Conclusions of the Supply Base Evaluation

- 3.9** The *Organisation* shall evaluate the *risk*, considering the probability and the consequences of *non-conformance*, for each Indicator of Standard 1.
- 3.10** The *Organisation* shall assign a single *risk rating* for each Indicator (and per *sub-scope* if applicable), as follows.
- a. *Low risk*: An Indicator shall only be categorised as *low risk* if there is evidence of negligible risk of *non-conformance*, considering the probability and consequences.
  - b. *Specified risk*: All Indicators that cannot be categorised as *low risk* shall be considered *specified risk*.
- 3.11** The *Organisation* shall consider *feedstock* as *SBP-compliant* if:
- a. the results of the *Risk Assessment(s)* conclude *low risk* for all Indicators, or
  - b. the results of the *Risk Assessment(s)* conclude *specified risk* however the RMMs have effectively reduced all *specified risks* to *low risk*, or
  - c. the *Organisation* can provide evidence that the *feedstock* can be categorised as *processing residues* and that the *feedstock* is certified against an *SBP-recognised certification scheme*, or
  - d. the *Organisation* can provide evidence that the *feedstock* can be categorised as *post-consumer*.

## 4 Supply Base Reporting

- 4.1** The *Organisation* shall prepare a *Supply Base Report (SBR)* using the *SBP Audit Portal*.
- 4.2** The *Organisation* shall update its *SBR* at least annually.
- 4.3** The *Organisation* shall make the *SBR*, including Annex 1 if applicable, available on request to *stakeholders*.

## 5 Supply Base Verifiers (SBVs)

- 5.1** *SBVs* shall not remove or weaken the indicators set out in SBP Standard 1.
- 5.2** *SBVs* shall not alter the intent of the indicators.
- 5.3** For each Indicator in SBP Standard 1, the *Organisation* shall identify and maintain a list of *SBVs* in accordance with the following:
- 5.3.1** The *Organisation* shall identify all *applicable laws* within the *Supply Base* that meet the Indicators of SBP Standard 1.
- 5.3.2** The *Organisation* shall determine *SBVs* to evaluate whether these laws are enforced.
- 5.3.3** The *Organisation* shall determine *SBVs* to evaluate whether the laws are implemented by the operators within the *Supply Base*.
- 5.3.4** The *Organisation* shall determine *SBVs* to evaluate whether *operators* within the *Supply Base* are implementing best practices that demonstrably meet the Indicators of SBP Standard 1.

## 6 Risk Assessment

- 6.1** The *Organisation* shall conduct a *Risk Assessment* to determine if there is a *risk* that the *feedstock* sourced is not in *conformance* with SBP Standard 1 requirements, using identified *SBVs*.
- 6.2** The *Organisation* shall include all *operators* involved in the production, harvesting and transport of *feedstock* within its *Supply Base*, and having an impact on *conformance* with SBP standards, in its *Risk Assessment*.
- 6.3** The *Organisation* may only conclude *low risk* according to the following:
- a. if legislation which addresses the requirement(s) in SBP Standard 1 exists and is enforced, and *operators* are demonstrating legal compliance within the *Supply Base*; or
  - b. in the absence of existing *applicable legislation* or lack of legal enforcement, by assessing whether relevant *operators* are implementing best practice which demonstrates *conformance* with the requirements of SBP Standard 1.
- 6.4** The *Organisation* shall justify the *risk rating* using the identified *SBVs*. The *Organisation* shall include this information in its *SBR*.
- 6.5** The *Risk Assessment* shall be signed off by senior management in the *Organisation*.

## 7 Risk Management

- 7.1** The *Organisation* shall develop a *Risk Management Plan (RMP)* which includes *Risk Management Measures (RMMs)* for each Indicator rated as *specified risk* within its *SBE* per the *Organisation's Risk Assessment* or an *SBP-endorsed RRA* with the objective to mitigate the *risk* and reduce the *risk rating* to *low risk*.
- 7.2** The *Organisation* shall implement any *RMMs* proposed by SBP (i.e., in *Instruction Documents*) or by *SBP-endorsed RRAs*.
- 7.3** Where there are no *RMMs* proposed by SBP, the *Organisation* shall develop its own, based on available best practice, knowledge of its specific *suppliers* and *risk factors*, and other relevant factors.
- 7.4** The *Organisation* shall ensure that the *RMP* identifies:
- a. to whom in the *Supply Base* the *RMMs* applies, to address all *specified risks*;
  - b. the timeframe by when the *RMMs* shall be implemented; and
  - c. the *Means of Verification* of the effectiveness of the *RMMs* to reduce the *risk rating* to *low risk*.
- 7.5** *RMMs* shall be justified and documented, with records of implementation maintained.
- 7.6** The *RMP* shall be signed off by senior management in the *Organisation*.
- 7.7** The *Organisation* shall monitor the effectiveness of its *RMMs* at least every 12 months but in any case, prior to its annual *audit*.
- 7.8** Where *RMMs* are found to have not been effective in mitigating *risk*, the *Organisation* shall consider the feedstock not *SBP-compliant*, until the *Organisation* implements further mitigation measures and verifies their effectiveness (i.e., reducing the *risk rating* to *low*) for the *feedstock* to be considered *SBP-compliant*.
- 7.9** The *Organisation* shall stop considering as *SBP-compliant feedstock* sourced from *suppliers* who, following request, fail to demonstrate that they are implementing *RMMs*.

## 8 Stakeholder Engagement

- 8.1** Before finalising its *SBE* or when the *Organisation* updates its *SBE*, the *Organisation* shall engage with its *stakeholders*, with the specific intention of seeking feedback on its *SBE*, including its:
- Supply Base Verifiers*,
  - Risk Assessment* and *risk ratings*, and
  - the *Risk Management Plan*, *Risk Management Measures* and *Means of Verification*.
- 8.2** The *Organisation* shall engage with its *stakeholders* each time the *SBE* is revised.
- 8.3** The *Organisation* shall seek to address relevant *stakeholder* concerns; it is not required to achieve a consensus with *stakeholders*.
- 8.4** The *Organisation* shall allow *stakeholders* at least one month to provide feedback before the *SBE* is finalised.
- 8.5** The *Organisation* shall provide *stakeholders* with adequate information as a basis for informed comment but does not have to provide confidential information.
- 8.6** The *Organisation* shall maintain the following records:
- lists of individuals/*organisations* invited to comment;
  - copies of all correspondence and/or comments received with respect to the *SBE* and its components; and
  - justification for any information withheld on the grounds of confidentiality.
- 8.7** The *Organisation* shall provide to those *stakeholders* who engaged in the process feedback on their comments and the revised *SBR*.

## Annex 1: SBP processing residues and post-consumer feedstock requirements

Adapted from Reference Source: FSC-STD-40-007 (V2-0) EN: Sourcing Reclaimed Material For Use In FSC Product Groups Or FSC-Certified Projects

### 1. Verification and monitoring of suppliers

- 1.1** The *Organisation* shall conduct a verification process for its *suppliers* of *processing residues* and *post-consumer feedstock* to determine whether this *feedstock* is eligible for the *SBE* exemptions mentioned in 3.2 above.
- 1.2** Verification shall include the following elements:
- a. For each *supplier*, the *Organisation* shall define the necessary evidence, actions and record keeping procedures to show that *feedstock* received conforms with the SBP definitions of *processing residues* and/or *post-consumer feedstock*. These records shall specify:
    - i. Name and address of the *supplier*;
    - ii. Type of *supplier* (i.e., producer, purchaser/collector from point of reclamation, *Trader*);
    - iii. *Categories of feedstock* supplied (i.e., *processing residues*, *post-consumer*);
    - iv. Level of control required (i.e., visual inspection upon receipt, *supplier audits* – see Annex 1, sections 2 and 3 below); and
    - v. Self-declaration that the *feedstock* qualifies as *processing residues* or *post-consumer feedstock* according to SBP.
  - b. The *Organisation* shall monitor the conformance of its *suppliers* with SBP definitions and purchase specifications and shall have a contingency plan to cater for non-compliant *feedstock* or documentation. For example, the *Organisation* might classify *feedstock* as *non-eligible input* for SBP products, request correction of purchase documents, or invalidate *suppliers* temporarily or permanently.

### 2. Feedstock inspection and categorisation upon receipt

- 2.1** Upon receipt, the *Organisation* shall visually inspect all *processing residues* and/or *post-consumer feedstock* and shall confirm their categorisation as 'processing residues' or 'post-consumer' *feedstock*.
- 2.2** For all *processing residues* and *post-consumer feedstock* received, the *Organisation* shall retain documentary evidence of the delivery and inspections carried out that confirmed that the *feedstock* complies with SBP definitions.

- 2.3** In cases where adequate evidence for the categorisation of the *feedstock* as 'processing residues' or 'post-consumer' *feedstock* is not available at the point of receipt, the *Organisation* shall include the *supplier* in the *supplier audit* and *conformance* with the relevant SBP requirements shall be confirmed prior to the *feedstock* being used.
- 2.4** In cases where *feedstock* received does not comply with purchase specifications and/or the quantities stated on the invoices are incorrect, the *Organisation* shall take immediate corrective actions. These actions shall be recorded and communicated to the *Certification Body* during the annual *audit*.

### 3. **Supplier audit for processing residues and post-consumer feedstock**

Note: Section 3 is only required if *feedstock* categorisation could not be demonstrated through Section 2 above.

- 3.1** The *Organisation* shall perform annual or more frequent on-site *audit* of the *suppliers* as part of the *supplier audit* for *processing residues* and *post-consumer feedstock* (including overseas *suppliers*) based on a justified sampling approach.
- 3.2** *Traders* or sales offices that do not take physical possession of *processing residues* or *post-consumer feedstock*, and which do not alter, store or re-package the *feedstock* may be verified remotely through desk *audits*.
- 3.3** The *legal owner* may contract another external, suitably qualified party to operate the *supplier audit*.
- 3.4** In cases where the *supplier* selected for sampling sells *processing residues* or *post-consumer feedstock* that were previously collected, classified and traded by other companies or sites, the complete supply chain of these *feedstock* shall be *audited* back to the point where the categorisation as *processing residues* or *post-consumer feedstock* can be demonstrated through objective evidence.
- 3.5** The *Organisation* shall evaluate and verify documents and other evidence regarding the quantity, quality and *conformance* with SBP definitions of *processing residues* and *post-consumer feedstock*, including:
- a. *Supplier's* instructions or procedures put in place to control and classify the *processing residues* and/or *post-consumer feedstock*.
  - b. When applicable, training or instructions provided to the *supplier's* personnel in relation to categorisation and control of *processing residues* and/or *post-consumer feedstock*.
  - c. Registers establishing *feedstock* origin (e.g., photographs, addresses of demolished buildings, invoices).
- 3.6** The *Organisation* shall consider a declaration from the *supplier*, even if part of the contractual agreement, as not sufficient proof of origin and *feedstock category*.
- 3.7** The *Organisation* shall document *supplier audits*, including a record of *audit* date, findings, names and qualifications of auditors and examples of evidence concerning categorisation of *feedstock*.