

## Consolidated Q&As arising from the *Updated SBP EU RED normative requirements* webinar held on 3 April 2025

#	Question	Answer
1	Is the implementation timeline for REDIII one year from the date of publication?	No. All SBP Certificate Holders with EU RED in their certificate scope shall update their management systems using the updated EU RED normative documents <b>by 21 May 2025</b> . It means that all EU RED- certified companies must operate in line with REDIII requirements from 21 May 2025. Certification Bodies will verify conformance during regular audits, starting 21 May 2025.
2	If a mill was audited to REDII earlier this year, will a supplemental audit be required for REDIII after 21 May?	No. It will be verified during the next regular audit, no extra audit is required.
3	If an audit starts before 21 May 2025 but concludes after that date, do the REDIII requirements apply to that audit?	If audit closing meeting happens before 21 May 2025, then the audit may be still conducted against REDII. REDIII conformance will be audited during the next regular audit. However, irrespective of the scope of the audit, companies must operate according to REDIII from 21 May 2025.
4	If the annual audit is scheduled for September, should the auditor evaluate feedstock received up to 21 May under REDII, and feedstock after 21 May under REDIII?	Yes.
5	Can SBP-controlled forest residues be claimed as REDIII-compliant, or is a full SBP-compliant claim necessary?	SBP-controlled biomass can only be produced from FSC-CW or PEFC-CS feedstock. The SBP EU RED-compliant claim shall be used together with either the SBP-compliant or SBP-controlled claim.
6	If processing residues are not certified under an SBP-recognised certification scheme, is implementation of an SBE/RRR required?	For SBP-compliant biomass, all Supply Base Evaluation requirements, including risk assessment and risk mitigation, are applicable to non-certified processing residues feedstock (please see SBP Standard 2). For SBP EU RED-compliant biomass, REDIII sustainability criteria do not apply to processing residues. However, it is required to obtain evidence of the feedstock category to apply the exemption.
7	May you explain how our sub-supplier, who supplies processing residue, can comply with EU RED?	Your supplier would not need to comply with the REDIII sustainability criteria, but would still need to demonstrate the category of their feedstock, as per SBP EU RED Bridging ID section 5 SBP requirements for Biomass Producers: conformance with EU RED Article 29 (1) - Exemption for processing residues and post-consumer feedstock (wastes and residues).
8	Will GIS tools, maps, or relevant references be available if Member States fail to clearly define no-go or restricted areas in legislation?	SBP REDIII Level A risk assessment will include details about no-go and restricted areas. In countries not covered by SBP RRAs, the Biomass Producer needs to do their own research.
9	How will you audit old-growth forests under the SBP standard, given that REDIII allows national definitions that vary across countries?	The SBP REDIII Level A risk assessment will consider local definitions. In countries not covered by SBP RRAs, the Biomass Producer needs to do their own research and apply local definitions, if available. The Certification Bodies and auditors will also conduct their research in preparation of the audits. If a national

	definition is not available, the EU interpretation must be followed.
10 Regarding clear-cut thresholds: what approach should be taken if no threshold is defined in the country?	If no legal maximum threshold is defined in the country, then a Biomass Producer must apply best management practices.
11 Can Biomass Producers source from no-go areas or Natura 2000 habitats if evidence is provided that raw material production does not harm the area?	Absolute no-go areas are primary forests, old-growth forests, natural highly biodiverse grasslands, and heathlands. Highly biodiverse forests, non-natural highly biodiverse grasslands, peatlands, and wetlands are restricted areas, where biomass sourcing is allowed under certain conditions. Please see details in draft SBP EU RED Bridging ID section 4.6 Assessment of compliance with RED Article 29 (6). Agricultural biomass criteria Article 29(3-5) can be found in section 4.2.
12 Does REDIII introduce any changes for residues and post-consumer feedstocks?	No.
13 Will Level A risk assessments be revised in time to meet REDIII criteria, including those developed externally (e.g., Wallonia in Belgium)?	SBP will publish the REDIII Level A risk assessment at least in a draft form to highlight the sustainability criteria that would involve a Level B. It will be made available by 21 May 2025. SBP does not have information about external Level A risk assessments, the responsible organisation should be contacted to get updates.
14 Are there plans to update Level A REDIII assessments for Germany, France, and the Walloon region—particularly for indicators lacking legislation and potentially needing Level B?	These assessments were carried out by external organisations. SBP does not have information about plans to update external Level A risk assessments, the responsible organisation should be contacted to get updates.
15 Are sampling requirements for Certification Bodies included in Standard 3 also applicable to RED Level B evaluations?	Yes.
16 Is it correct that feedstock containing stumps and roots cannot be REDIII-compliant due to the requirement that harvesting of such materials is to be avoided?	According to EU REDIII 29 (6), the harvesting of stumps and root should be avoided if they have a negative impact on soil quality and biodiversity and results in adverse impact. Article 3(3) indicates that direct financial support cannot be granted by Member States for the use of stumps and roots to produce energy.
17 Does the REDIII criteria also apply to bio-based energy used at the plant, or only to the raw material inputs?	REDIII criteria only applies to feedstock used for production of SBP EU RED-compliant biomass.
18 Will material felled and documented under REDII on or before 21 May still be eligible for delivery under REDIII (e.g., one month later)?	Starting from 21 May 2025, biomass must be produced with feedstock that complies with REDIII. Biomass Producers should collect additional evidence from suppliers/loggers on whether this material complies with REDIII, even if it was harvested before 21 May 2025. For practical reasons, Biomass Producers should not wait until 21 May 2025 to start collecting REDIII proof of compliance for feedstock purchased before. Everyone should start talking to their suppliers as soon as possible and start preparing for REDIII compliance. If it is evident that some of the previously harvested/sourced feedstock does not comply with REDIII then this material cannot be used in production of SBP EU RED-compliant biomass after 21 May 2025. Any EU RED-compliant biomass purchased before 21 May and sold after 21 May will still maintain their EU RED-compliant claim.
19 For the SBP Standards v2.0 REDIII audit, is it sufficient to demonstrate a risk mitigation system (procedures), or must implementation already be proven?	From 21 May 2025 procedures need to be established and also implemented.

20 For France, will the SBP-recognised Level A Risk Assessment be sufficient for demonstrating legality, regeneration, etc.?	Partially. Under sustainable harvesting criteria 29(6) three indicators remain the same: - Legality - Regeneration - Long-term forest production capacity Thus, for these indicators Level A from REDII may be used.
21 If both an SBP RRA for forests and one for TOF exist for a country, is there a risk of overlapping indicators, and how is this managed?	SBP RRA for Forests and SBP RRA for TOF are two separate documents. Risk descriptions and risk ratings may be similar but may also differ as different legislation usually applies and different practices observed.
22 We see Biomass Producers creating Level B reports approved by other Certification Bodies and accepted for entire countries without extra criteria—is this approach valid?	Level B is a path where a Biomass Producer needs to apply a management system at a forest sourcing area level. A forest sourcing area level may be the whole country (e.g., Estonia).
23 Are there valid arguments for Certification Bodies or Certificate Holders to reschedule SBP assessments with REDII in scope (currently planned for late April or early May 2025) to after 21 May 2025?	This should not be a valid argument to postpone the audit beyond the field work target date. Considering that this year all Certificate Holders need to transition to SBP Standards v2.0 by 9 November, Certification Bodies should plan their resources wisely. Whilst REDIII must be implemented from 21 May 2025, conformance may be audited during the next regular audit after 21 May 2025 (in these examples April and May 2026).