



Standards Development Process

Standards Development Process: Overview of Definitions of Biomass Sustainability Within Key Markets

Sustainable Biomass Program
sbp-cert.org



Version 1.0

May 2020

Document history

Version 1.0: published 20 May 2020

© Copyright Sustainable Biomass Program Limited 2020

Contents

1	Purpose	1
2	Legislation/requirements	2
3	Sustainability requirements	3
4	GHG/carbon and energy thresholds	4
5	Recognised means of demonstrating compliance	5
6	Additional specific requirements (excluding EUTR)	6
7	Expected short/medium term changes	8

1 Purpose

This document provides an overview of legislative and sustainability requirements, including greenhouse gas thresholds and means to demonstrate compliance, for the use of woody biomass in energy production in Belgium (Flanders), Denmark, the Netherlands, and the UK.

The Standards Development Process Working Groups may refer to this document during the development of content for the standards.

2 Legislation/requirements

Country	Link to primary legislation	Link to additional guidance
Belgium (Flanders)	https://codex.vlaanderen.be/Zoeken/Document.aspx?DID=1019755&param=informatie	https://www.energiesparen.be/groene-energie-en-wkk/prof/GSC
Belgium (Wallonia)	https://wallex.wallonie.be/content/recherche.html?legislation=true&j=true&ja=true&q=%C3%A9nergie	https://www.cwape.be/?lg=1&dir=0.2
Netherlands	https://www.rvo.nl/subsidie-en-financieringswijzer/stimulering-duurzame-energieproductie-sde/wet-en-regelgeving-stimulering-duurzame-energieproductie	https://www.rvo.nl/subsidie-en-financieringswijzer/stimulering-duurzame-energieproductie-sde/categorie%C3%ABn/biomassa-sde/duurzaamheidseisen
Denmark	No primary legislation. https://www.danskenergi.dk/sites/danskenergi.dk/files/media/dokumenter/2017-09/IndustryAgreement_Biomass-20160623.pdf	All regulation is provided by the Danish Industry agreement (DIA): https://www.danskenergi.dk/sites/danskenergi.dk/files/media/dokumenter/2017-09/IndustryAgreement_Biomass-20160623.pdf
UK	https://www.legislation.gov.uk/ukdsi/2015/9780111138359/pdfs/ukdsi_9780111138359_en.pdf	Summary here: https://www.ofgem.gov.uk/environmental-programmes/ro/applicants/biomass-sustainability Sustainability criteria here: https://www.ofgem.gov.uk/system/files/docs/2018/04/ro_sustainability_criteria.pdf Sustainability reporting requirements here: https://www.ofgem.gov.uk/system/files/docs/2018/04/sustainability_reporting_guidance.pdf

3 Sustainability requirements

Country	Percentage requirements: sustainable vs controlled
Belgium (Flanders & Wallonia)	Primary 100% sustainable, Secondary 100% controlled ¹ .
Netherlands	Primary (cat 1-2) 100% sustainable, Secondary (cat5) 100% controlled.
Denmark	100% sustainable – 90% documentation requirement.
UK	<p>There are two requirements, the land criteria and the GHG criteria:</p> <p>The land criteria have a requirement to meet a minimum limit of 70% of all feedstocks from what are considered to be sustainable sources across any month. All material must be reported – so any material that does not meet the requirements of the land criteria must be disclosed as such in the monthly reporting.</p> <p>The GHG criteria specifies a GHG limit, which must be complied with in order to receive the subsidy. The regulations also have a ‘GHG averaging mechanism’ (see below). If a consignment breaches the GHG limit, the subsidy will not be granted. At the end of the compliance year, the average of the GHG figures across the year is calculated; if the average is below the target, and the consignment was below the relevant ceiling, then the subsidy is granted.</p>

¹ Solid or gaseous biomass produced from waste and solid or gaseous biomass produced from waste and residues from agriculture, aquaculture, fisheries, forestry or nature reserves need only comply with the sustainability criteria set out in paragraphs 1/8 (GHG threshold) and 1/10 (soil quality for agricultural biomass).

4 GHG/carbon and energy thresholds

Country	Threshold			Means of calculation
Belgium (Flanders)	Green certificates are granted in proportion to the supply chain energy balance. Mandatory threshold of 60% per consignment and 70% yearly.			BioGrace and JRC are mentioned in the legislation.
Netherlands	70%			BioGrace-II or equivalent
Denmark	72% by 2020.			EU model – BioGrace
UK				<p>The UK uses the GHG methodology laid out in the Renewable Energy Directive. The UK also provides access to a GHG calculator tool, which can be found here: https://www.ofgem.gov.uk/publications-and-updates/uk-solid-and-gaseous-biomass-carbon-calculator</p> <p>Generators are not required to use this calculation tool, but there are benefits to doing so, as the methodology of the calculation has already been approved and does not need to be tested by an auditor.</p> <p>The GHG savings should all be against the EU fossil fuel comparator, but this figure changes, so it is not always clear exactly what a GHG % saving means. Consequently, the UK uses a static figure.</p>
	Timeframe	Relevant Target	Relevant Ceiling	
		is the threshold for which the average GHG emissions of all the relevant biomass used in an obligation year should meet	is the maximum threshold for which relevant biomass can be issued ROCs	
	Pre-April 2020	79.2 gCO ₂ eq/MJ electricity	None	
	All solid biomass and biogas stations from 1 April 2020 to 31 March 2025	55.6 gCO ₂ eq/MJ electricity	75 gCO ₂ eq/MJ electricity	
All solid biomass and biogas stations from 1 April 2025	50 gCO ₂ eq/MJ electricity	72.2 gCO ₂ eq/MJ electricity		

5 Recognised means of demonstrating compliance

Country	Recognised means
Belgium (Flanders)	Recognition process ongoing: SBP for supply base (Std1/2) and GHG data (Std 5) including the calculation of GHG savings (Std 6).
Netherlands	SBP, GGL, Better Biomass, ISCC and FSC with correct claims subject to Category of Biomass. Complex for Category 1 and 2 biomass, relatively simple for Category 5 biomass.
Denmark	SBP-compliant, FSC 100%, FSC Mix Credit, 100% PEFC, or other appropriate form of documentation verified third-party accredited to undertake FSC, PEFC or SBP certification.
UK	<p>SBP Compliant, FSC 100%, FSC Mix Credit, PEFC 100%.</p> <p>Alternatively, generators can demonstrate compliance using bespoke evidence that demonstrates compliance with the criteria. For woody biomass, using bespoke evidence is more complicated, and further guidance has been provided by the regulators. The link below gives three guidance documents on using this bespoke evidence:</p> <p>https://www.gov.uk/government/publications/woodfuel-guidance-version-2</p>

6 Additional specific requirements (excluding EUTR)

Country	Additional specific requirements
Belgium (Flanders)	<p>Woody biomass may not be in competition with Flemish wood industry</p> <p>Stemwood may not be sawlogs (must be low grade and it must be verified by the CB)</p> <p>Stemwood may not originate from trees above 40 years old, except if less than 50% is used for energy (=NL).</p> <p>Biomass Producer should work on the basis of a Forest Management Plan</p>
Netherlands	X
Denmark	<p>Generally more focus on carbon and the countries that haven't ratified the Paris agreement.</p> <p>Modern slavery and Anti bribery requirements.</p>
UK	<p>Modern slavery, and anti-bribery requirements.</p> <p>The reporting requirements for biomass also mean that it is necessary to know exactly the amount of biomass that makes up different 'consignments'. In this context, a consignment includes a unique country of origin and feedstock type. So for example, if a pellet mill in Latvia uses both sawmill residues and roundwood, these are two separate consignments. If the sawmill residues were from trees harvested in Latvia, Estonia and Lithuania, then these are three separate consignments and the generator must know exactly the amount that came from each country.</p> <p>Profiling requirements:</p> <ol style="list-style-type: none"> a. the material that the biomass came from (for example, whether it was composed of wood), b. the form of the biomass, if the biomass was solid and can take different forms (for example, wood can take a variety of forms, depending on whether and how it has been processed and what it is), c. whether the biomass was waste or wholly derived from waste, d. whether the biomass was animal excreta, e. where the biomass was plant matter or derived from plant matter, the country where it was grown,

	<p>f. if the information in 'e' isn't known, or the biomass was not plant matter or derived from plant matter, the country the operator obtained the biomass,</p> <p>g. quantity – mass in tonnes if it is solid, or its volume in litres if it is liquid, or its volume in m³ if it is gaseous, when measured at 25 degrees Celsius and 0.1 megapascals,</p> <p>h. if the biomass was an energy crop, its type and what the land it was grown on was used for in the year before it was first used to grow energy crops,</p> <p>i. if the biomass was composed of, or derived from, wood (other than waste):</p> <ul style="list-style-type: none"> • the name of the forest or other place where that wood was grown, • a description of the forestry management or land management practices used in the forest or other place where that wood was grown, • the proportion of the biomass that was composed of, or derived from, hardwood and softwood, • if the wood was a protected or threatened species, the name of that species and the proportion of the biomass that is likely to be composed of, or derived from, that species, <p>j. the proportion of the biomass (if any) that was composed of, or derived from, saw logs and identify the specification adopted to determine the proportion of saw log, and if the biomass was bioliquid, used in a generating station on or after 1 January 2018, the energy content of the bioliquid produced from each of the following categories of crop:</p> <ul style="list-style-type: none"> • starch-rich crops; including cereals (regardless of whether only the grains are used or the whole plant (such as in the case of green maize) is used, tubers and root crops (such as potatoes, Jerusalem artichokes, sweet potatoes, cassava and yams) and corm crops (such as tara and cocoyam), • sugars, • oil crops, and • any other crops grown as a main crop primarily for energy purposes on agricultural land.
--	--

7 Expected short/medium term changes

Country	Expected short/medium term changes
Belgium (Flanders)	<p>By 1 Oct 2020: sustainability requirements must be assessed with a certification scheme including certified energy and GHG calculations.</p> <p>Certification scheme must be accredited by a national accreditation organisation of the EU.</p>
Netherlands	X
Denmark	Requirements currently being revised. Legislation will most likely replace the industry agreement in 2021 with the implementation of the RED II. Some changes in sustainability criteria may occur.
UK	<p>Potential change: the UK currently requires full sustainability assessment of processing residues (sawmill residues), this may change in order to align with the RED II and the requirements of the ILUC Directive.</p> <p>The GHG criteria listed above apply to all current generators supported under a subsidy scheme in the UK.</p> <p>Any future subsidy for biomass in the UK will be subject to a new GHG limit, 29 kg/MWh, which is 8 gCO₂/MJ (compared to the current 2025 limit of 50 gCO₂/MJ). Although the expectation is that there will be no future biomass subsidy (so this limit will not be relevant), it is still in legislation.</p>