Sustainable Biomass Program (SBP)

Schedule of Fees – Certificate Holders

This document contains the schedule of fees applicable to SBP Certificate Holders:

1) Biomass Producers (BPs)
2) Traders and End-users

Note: Service Providers within the supply chain who do not take legal ownership of SBP-certified material do not require an SBP certificate and are therefore exempt from any SBP fees.

The latest version of this document is published on the SBP website (www.sbp-cert.org).

Italicised terms are defined within the separate SBP Glossary of Terms and Definitions and/or in Instruction Document 5E available online on the SBP website.

In addition to the fees set out in this schedule, Certificate Holders may incur costs related to the annual inspection and certification process. These costs are charged directly by the relevant Certification Body.

Fee schedule scenarios for companies that are Biomass Producers and also Traders, or Traders and also End-users, etc. are provided to illustrate the practical application of the fee schedule and associated payment points in Appendix 1.

Effective Date, Review and Changes

The fees described within this schedule are effective from 1 October 2017 and will apply to all SBP Certificate Holders from this point.

This schedule was modified on 5 January 2021.

This fee schedule will be reviewed on an annual, or more frequent, basis thereafter. SBP reserves the right to amend this fee schedule in consideration of SBP’s interests if such amendment does not entail substantial legal or financial disadvantages for Certificate Holders. SBP shall inform all Certificate Holders in due time before changing this fee schedule, but at the latest one month before it is to become effective. The respective information is sent to the email address provided by each Certificate Holder. Should a Certificate Holder not agree to an amendment intended by SBP, the Certificate Holder has the right to object, in writing, within one month of the notification. If the Certificate Holder’s objection is not upheld, and the Certificate Holder persists with the objection, SBP is entitled to terminate the Trade Mark Licence Agreement with one month’s notice.
General Information

Fee invoices are issued subject to SBP’s standard terms of business. Invoices are payable 30 days from issue. Fees paid are non-refundable.

Section 1: Applicable to Biomass Producers

*Biomass Producers* producing wood pellets pay a fee of €0.15 per tonne of all wood pellets sold with an *SBP claim*.

*Biomass Producers* producing woodchips pay a fee of €0.08 per tonne of all woodchips sold with an *SBP claim*.

The fee is to be paid quarterly, in arrears, based upon actual sales of pellets/chips with an *SBP claim* made in the previous quarter (based on the ‘Transaction Accepted Date’ field in the SBP Data Transfer System (DTS)). Sales data will be based on claims recorded in the DTS.

For example, invoices will be raised in January 2021 covering sales made in the period 1 October – 31 December 2020. Subsequent invoices will be raised quarterly thereafter. Fees based on sales data entered after an invoice has been issued will be added to the next quarter’s invoice.

Section 2: Applicable to Traders and End-users

A legal entity not involved in the biomass production process requires an SBP Chain of Custody certificate if they take legal ownership of SBP-certified biomass and wish to sell or use that biomass with the *SBP claim*. In SBP’s Instruction Document 5E these *Certificate Holders* are defined as Traders and End-users.

SBP-certified *Traders* and *End-users* pay an annual fixed fee.

The annual period, or “billing year” for such *Certificate Holders* will run from 1 October to 30 September.

Actual fees are based upon the total volume (in tonnes) of biomass sold or used with a *SBP claim* by SBP-certified *Traders and End-users* in the billing year. In the case of *Traders*, the fee is charged regardless of the nature of the customer sold to.

<table>
<thead>
<tr>
<th>Annual volume (tonnes)</th>
<th>Annual fixed fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Large entities</td>
<td>250,000+</td>
</tr>
<tr>
<td>Standard fee</td>
<td>100,000-249,999</td>
</tr>
<tr>
<td>Small entities</td>
<td>99,999 or less</td>
</tr>
</tbody>
</table>

1 There are two *SBP claims*: ‘SBP-compliant biomass’ and ‘SBP-controlled biomass’

2 The principle behind the fee schedule is to introduce a flat rate fee with just two categories of fuel. These categories were determined based on the significantly different energy values of the majority of traded wood pellets compared to the majority of traded woodchips. For the avoidance of doubt, and to cover the full range of biomass types traded with SBP claims, including energy logs, the following definition is used.

*Given that the differentiation in fees is based on Net Calorific Value, the definitive differentiation between pellets and woodchips for the purpose of SBP fees is stated as “Ordinarily, pellets and woodchips may readily be differentiated by physical inspection, however, where such physical inspection is not definitive then biomass with a Net Calorific Value greater than 15MJ/kg shall be considered to be pellet and below 15MJ/kg shall be considered to be woodchip.”*

3 Woodchips are to be recorded in the DTS on a wet tonne basis.

4 Amounts due under €1,000 will be rolled over and invoiced following the calendar quarter when the cumulative amount due exceeds €1,000. At the end of each calendar year, amounts due under €1,000 will be invoiced in the Q4 invoicing run.
The Certificate Holder’s first invoice in each billing year will be raised at the “Standard fee” rate when the Certificate Holder’s recorded claims in the DTS in that billing year exceed 99,999 tonnes. The invoice will be issued at the beginning of the next calendar quarter. The Certificate Holder’s second invoice will be raised at the “Large entities” fee (with a credit for the “Standard fee” already paid) at the time when the Certificate Holder’s recorded claims in the DTS in that billing year exceed 249,999 tonnes. The invoice will be issued at the beginning of the next calendar quarter.

Upon SBP approval, “small scale” End-users providing energy to public services such as schools and hospitals may be excluded from the fee schedule. Application for exception shall be submitted by the responsible Certification Body to SBP.
Appendix 1 – Fee Schedule Scenarios

The following example scenarios are provided to illustrate the practical application of the fee schedule and associated payment points. The scenarios given cover a 12-month period starting 1 October 2017. In this document the term “Group” or “Group of Companies” is considered to be any number of companies that share a common ultimate parent.

<table>
<thead>
<tr>
<th>1. ‘SBP-compliant’ and ‘SBP-controlled biomass’ both attract fees</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Transaction description</strong></td>
<td><strong>Fees due</strong></td>
</tr>
<tr>
<td>A BP sells 50,000t of pellets with an ‘SBP-compliant biomass’ claim and 50,000t of pellets with an ‘SBP-controlled biomass’ claim</td>
<td>The BP pays €0.15 x (50,000 + 50,000) = €15,000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2. Biomass sold with no SBP claim does not attract fees</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Transaction description</strong></td>
<td><strong>Fees due</strong></td>
</tr>
<tr>
<td>A BP sells 50,000t of pellets with an ‘SBP-controlled biomass’ claim and 50,000t of pellets with no SBP claim</td>
<td>The BP pays €0.15 x (50,000 + 0) = €7,500</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. Fee differential between woodchips and pellets for BPs</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Transaction description</strong></td>
<td><strong>Fees due</strong></td>
</tr>
<tr>
<td>A BP sells 50,000t of woodchips with an ‘SBP-controlled biomass’ claim</td>
<td>The BP pays €0.08 x 50,000 = €4,000</td>
</tr>
<tr>
<td>Another BP sells 50,000t of pellets with an ‘SBP-controlled biomass’ claim</td>
<td>The BP pays €0.15 x 50,000 = €7,500</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>4. BPs acting as both Biomass Producers and Traders attract fees for both activities</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Transaction description</strong></td>
<td><strong>Fees due</strong></td>
</tr>
<tr>
<td>BP1 produces 300,000t of pellets with an SBP Claim and sells to BP2</td>
<td>BP1 pays €0.15 x 300,000 = €45,000</td>
</tr>
<tr>
<td>BP2 produces 200,000t of pellets itself and combines that with the 300,000t of pellets bought from BP1 and sells 500,000t of pellets with an SBP Claim</td>
<td>BP2 pays €0.15 x 200,000 = €30,000 plus BP2 operates as a Trader and pays the annual fixed fee of €25,000</td>
</tr>
<tr>
<td></td>
<td>BP2 Total fee = €30,000 + €25,000 = €55,000</td>
</tr>
</tbody>
</table>
5. There is no fee for service providers not taking legal ownership

**Transaction description**
A BP sells 300,000t of pellets with an SBP claim to an End-user

The BP uses a third-party logistics company which does not take legal ownership to deliver the pellets

**Fees due**
The BP pays €0.15 x 300,000 = €45,000

The third-party logistics company does not pay a fee

6. End-Users using SBP claims attract fees

**Transaction description**
A BP sells 300,000t of pellets with an ‘SBP-compliant biomass’ claim to an End-user

The End-user accepts the pellets with an SBP claim in the Data Transfer System as it wishes to declare to regulators that it uses SBP-compliant pellets

**Fees due**
The BP pays €0.15 x 300,000 = €45,000

The End-user is using the SBP claim and pays the annual fixed fee of €25,000

7. No fees where an SBP claim is not accepted

**Transaction description**
A BP sells 300,000t of pellets which are eligible for an SBP claim to an End-user that does not wish to accept the SBP claim

The End-user accepts the pellets and makes no claim about the SBP status of the pellets

**Fees due**
There is no fee for the BP

There is no fee for the End-user

8. No fees where an SBP claim is retrospectively rejected

**Transaction description**
A Trader sells 300,000t of pellets with an SBP Claim

The buyer accepts the Claim but subsequently rejects the delivery as it does not meet other contractual requirements

The load is rejected, and the SBP Claim is retrospectively rejected in the Data Transfer System

**Fees due**
There is no fee for the Trader (on the assumption that there are no other trades during the year)
<table>
<thead>
<tr>
<th>Case Study</th>
<th>Transaction Description</th>
<th>Fees due</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>9. End-users operating as Traders attract fees</strong></td>
<td>An End-user sells 300,000t of pellets with an SBP claim</td>
<td>The End-user is operating as a Trader and pays the annual fixed fee of €25,000</td>
</tr>
<tr>
<td><strong>10. Biomass Producer and End-user in same Group</strong></td>
<td>BP sells 100,000t of pellets with an SBP claim to End-user in the same Group of Companies</td>
<td>BP fees due: €0.15 x 100,000 = €15,000 &lt;br&gt;Chain of Custody fees due: 1 x €10,000 = €10,000 &lt;br&gt;Group pays a total of €25,000</td>
</tr>
<tr>
<td><strong>11. Biomass Producer, Trader and End-user in same Group</strong></td>
<td>BP sells 100,000t of pellets with an SBP claim to Trader in the same Group of Companies</td>
<td>BP fees due: €0.15 x 100,000 = €15,000 &lt;br&gt;Trader and End-User are in the same Group, so only pay 1 x Chain of Custody fee = €10,000 &lt;br&gt;Group pays a total of €25,000</td>
</tr>
<tr>
<td><strong>12. Group sells self-manufactured material via trading company</strong></td>
<td>BP sells 100,000t of pellets with an SBP claim to Trader in the same Group of Companies</td>
<td>BP fees due: €0.15 x 100,000 = €15,000 &lt;br&gt;No Chain of Custody fees are due &lt;br&gt;Group pays a total of €15,000</td>
</tr>
</tbody>
</table>
13. Group sells self-manufactured and purchased material via trading company

**Transaction description**
BP sells 100,000t of pellets with an SBP claim to Trader in the same Group of Companies

Trader buys 100,000t of pellets with an SBP claim from a third party, outside the Group

Trader sells 200,000t of pellets with SBP claim to a third party, outside of the Group

**Fees due**

BP fees due: €0.15 x 100,000 = €15,000

Trader has bought and sold third party material, so Group pays 1 x Chain of Custody fee = €10,000

Group pays a total of €25,000

14. Group has multiple entities trading SBP material

**Transaction description**
Trader 1, Trader 2 and Trader 3 are all members of the same Group of Companies

Trader 1 buys 100,000t of wood pellets with an SBP claim from a third party and sells the material with the claim to another third party

Trader 2 buys 100,000t of wood pellets with an SBP claim from a third party and sells the material with the claim to Trader 3

Trader 3 buys a further 100,000t of wood pellets with an SBP claim from a third party and sells 200,000t with the claims to another third party

**Fees due**

As all of the Trader companies are members of the same Group of Companies, only 1 x Chain of Custody fee is due = €25,000

Group pays a total of €25,000

15. Group has multiple entities trading small volumes of SBP material

**Transaction description**
Example is as per Scenario 14, except all three Trading companies are expected to trade a combined cumulative annual volume of 150,000t with an SBP claim

**Fees due**

1 x Chain of Custody fee is due, however, the Group will qualify for the ‘small’ Trader discount (for trading less than 250,000t in the year) and pays €10,000

16. Biomass Producer sells self-manufactured and purchased material to End-user in the same group transaction

**Transaction description**
BP produces 100,000t of SBP-certified pellets and combines this with 200,000t of pellets with an SBP claim bought from a third party

**Fees due**

BP fees due: €0.15 x 100,000 = €15,000
<table>
<thead>
<tr>
<th>party that is not in the group of the BP and the End-user</th>
<th>As BP and End-user are in the same group, only 1x Chain of Custody fee is due</th>
</tr>
</thead>
<tbody>
<tr>
<td>BP sells 300,000t of pellets with an SBP claim to End-user in the same group of companies as the BP</td>
<td>The End-user pays an annual fixed fee of €25,000 for 300,000t</td>
</tr>
<tr>
<td>End-user burns the material and uses the SBP claim for regulatory purposes</td>
<td>The group pays a total of €40,000</td>
</tr>
</tbody>
</table>