



## **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](http://www.sbp-cert.org)).

Italicised terms are defined within the separate SBP Glossary of Terms and Definitions and/or in Instruction Documents 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 audit and SBP 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 January 2025 and will apply to all SBP *Certificate Holders* from this date.

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 (TMLA) 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 All Certificate Holders

All *Certificate Holders* (Biomass Producers, Traders and End-users) are required to pay an **annual fee** of €1,000 for each calendar year. The annual fee represents a minimum fee for all *Certificate Holders*.

Should a *Certificate Holder* exceed the amount of the annual fee in **transaction fees** (the fees chargeable in accordance with Section 2 and Section 3 below) during a calendar year, the annual fee will be waived.

Should a *Certificate Holder* not incur any transaction fees (in accordance with Section 2 and Section 3 below) during a calendar year, the annual fee will be charged in full.

Should a *Certificate Holder* incur transaction fees up to the amount of the annual fee (that is, between €0 and the annual fee) during a calendar year, the transaction fees will be deducted from the annual fee, and the *Certificate Holder* will be charged the difference.

Those *Certificate Holders* that receive, lose or terminate SBP certification part-way through a calendar year are subject to the full annual fee for that year (subject to any adjustments for transaction fees incurred); it will not be pro-rated, reduced or waived.

The annual fee will be billed retrospectively in January<sup>1</sup> for the previous calendar year.

### Section 2: Applicable to Biomass Producers

*Biomass Producers* producing wood pellets pay a transaction fee of €0.19 per tonne of all wood pellets registered on the SBP Data Transfer System (DTS) and sold with a claim<sup>2</sup>.

*Biomass Producers* producing woodchips<sup>3</sup> pay a transaction fee of €0.10 per tonne<sup>4</sup> of all woodchips registered on the SBP DTS and sold with a claim<sup>2</sup>.

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<sup>1</sup> For Certificate Holders that lose or terminate certification part-way through a calendar year, a final invoice will be issued on the date of certification termination.

<sup>2</sup> Claims include any claim accompanying biomass registered on the SBP DTS, for example, SBP-compliant, SBP-controlled, EU RED, and will include any future claims incorporated into the SBP certification scheme upon recognition and approval of the scheme by competent regulatory authorities. Note: Fees are incurred per tonne, not per claim. Therefore, biomass carrying two claims will not be charged twice.

<sup>3</sup> 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."*

<sup>4</sup> Woodchips are to be recorded in the DTS on a wet tonne basis.

<sup>5</sup> Amounts due under €1,000 (excluding the annual fee) 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 transaction fee is to be paid quarterly<sup>1,5</sup>, in arrears, based upon actual sales of pellets/chips registered on the SBP DTS with a claim<sup>2</sup> in the previous quarter (based on the 'Transaction Accepted Date' field in the DTS). Sales data will be based on claims recorded in the DTS.

For example, invoices will be raised in April 2025 covering sales made in the period 1 January to 31 March 2025. 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.

For those *Certificate Holders* that have both Biomass Producer and End-user within their (single site) certificate scope, any biomass produced *and* consumed on site will attract the transaction fee per tonne of wood pellets or wood chips registered and set as consumed in the DTS.

### **Section 3: Applicable to *Traders and End-users***

A legal entity not involved in the *biomass production process* requires SBP Chain of Custody certification if they take legal ownership of biomass registered on the SBP DTS and wish to sell or use that biomass with a claim.

These *Certificate Holders* are defined as *Traders and End-users*.

SBP-certified *Traders and End-users* pay a fixed transaction fee.

The "billing year" for such *Certificate Holders* will be the calendar year, running from 1 January to 31 December.

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

<b>Category</b>	<b>Annual volume (tonnes)</b>	<b>Annual fixed fee</b>
<b>3</b>	250,000+	€ 30,000
<b>2</b>	100,000 - 249,999	€ 12,000
<b>1</b>	1 - 99,999	€ 1,200
<b>0</b>	Nil	Nil

The *Certificate Holder's* first invoice in each billing year will be raised at the respective category fee rate when the *Certificate Holder's* recorded claims in the DTS in a billing year exceed 0 (zero) tonnes. The *Certificate Holder's* next invoices, if applicable, will be raised at the subsequent category fee (with a credit for the fee already paid) at the time when the *Certificate Holder's* recorded claims in the DTS in a billing year exceeds the next threshold level. Invoices are issued at the beginning of every calendar quarter.

## 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 the calendar year starting 1 January. In this document the term “*Group*” or “*Group of Companies*” is considered to be any number of companies that share a common ultimate parent.

<b>1. Fee per tonne, not per claim</b>  <b>Transaction description</b> A BP sells 50,000t of pellets carrying both the ‘SBP-compliant’ claim and the ‘EU RED’ claim.	<b>Fees due</b>  The BP’s transaction fee is $\text{€}0.19 \times 50,000 = \text{€}9,500$ .  Therefore, the total fee paid is $\text{€}9,500$ .
<b>2. ‘SBP-compliant’ and ‘SBP-controlled biomass’ both attract fees</b>  <b>Transaction description</b> A BP sells 50,000t of pellets with an ‘SBP-compliant’ claim and 50,000t of pellets with an ‘SBP-controlled’ claim.	<b>Fees due</b>  The BP’s transaction fee is $\text{€}0.19 \times (50,000 + 50,000) = \text{€}19,000$ .  Therefore, the total fee paid is $\text{€}19,000$ .
<b>3. Biomass sold with no claim does not attract fees</b>  <b>Transaction description</b> A BP sells 50,000t of pellets with a claim and 50,000t of pellets with no claim.	<b>Fees due</b>  The BP’s transaction fee is $\text{€}0.19 \times (50,000 + 0) = \text{€}9,500$ .  The total fee paid is $\text{€}9,500$ .
<b>4. Fee differential between woodchips and pellets for BPs</b>  <b>Transaction description</b> BP1 sells 50,000t of woodchips with a claim.  BP2 sells 50,000t of pellets with a claim.	<b>Fees due</b>  BP1’s transaction fee is $\text{€}0.10 \times 50,000 = \text{€}5,000$ . The total fee paid is $\text{€}5,000$ .  BP2’s transaction fee is $\text{€}0.19 \times 50,000 = \text{€}9,500$ . The total fee paid is $\text{€}9,500$ .
<b>5. BPs acting as both Biomass Producers and Traders attract fees for both activities</b>  <b>Transaction description</b> BP1 produces 300,000t of pellets with a claim and sells to BP2.  BP2 produces 200,000t of pellets itself and combines that with the 300,000t of pellets	<b>Fees due</b>  BP1’s transaction fee is $\text{€}0.19 \times 300,000 = \text{€}57,000$ . The total fee paid is $\text{€}57,000$ .  BP2’s transaction fee is $\text{€}0.19 \times 200,000 = \text{€}38,000$ plus BP2 operates as a Trader and

bought from BP1 and sells 500,000t of pellets with a claim.	attracts the fixed transaction fee of €30,000. The total fee paid is €38,000 + €30,000 = €68,000.
<b>6. There is no fee for service providers not taking legal ownership</b>  <b>Transaction description</b> A BP sells 300,000t of pellets with a claim to an End-user.  The BP uses a third-party logistics company which does not take legal ownership to deliver the pellets.	<b>Fees due</b>  The BP's transaction fee is €0.19 x 300,000 = €57,000. The total fee paid is €57,000.  The third-party logistics company does not pay a fee.
<b>7. EU RED claims attract fees</b>  <b>Transaction description</b> A Trader sells 50,000t of pellets with an 'EU RED' claim (thereby using the SBP scheme to register RED claims).  The same Trader sells 100,000t of pellets with an 'SBP-compliant' claim.	<b>Fees due</b>  The Trader sold a total of 150,000t with claims.  The Trader pays the fixed transaction fee of €12,000.
<b>8. End-Users using claims attract fees</b>  <b>Transaction description</b> A BP sells 300,000t of pellets with a claim to an End-user.  The End-user accepts the pellets with a claim in the DTS.	<b>Fees due</b>  The BP's transaction fee is €0.19 x 300,000 = €57,000. The total fee paid is €57,000.  The End-user is using a he SBP claim and attracts the annual transaction fee of €30,000. The total fee paid is €30,000.
<b>9. No fees where a claim is retrospectively rejected</b>  <b>Transaction description</b> A Trader sells 300,000t of pellets with a 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 claim is retrospectively rejected in the DTS.	<b>Fees due</b>  The Trader and the Buyer pay the annual fee of €1,000 each.  There is no further fee for the Trader (on the assumption that there are no other trades during the year).

<p><b>10. End-users operating as Traders attract fees</b></p> <p><b>Transaction description</b> An End-user sells 300,000t of pellets with a claim.</p>	<p><b>Fees due</b></p> <p>The End-user is operating as a Trader and pays the fixed transaction fee of €30,000.</p> <p>The total fee paid is €30,000.</p>
<p><b>11. Biomass Producer and End-user in same Group</b></p> <p><b>Transaction description</b> The BP sells 100,000t of pellets with a claim to an End-user in the same Group of Companies.</p> <p>The End-user consumes the biomass and uses the claim for regulatory purposes.</p>	<p><b>Fees due</b></p> <p>The BP's transaction fee is <math>€0.19 \times 100,000 = €19,000</math>. The total fee paid is €19,000.</p> <p>The End-user's fixed transaction fee is <math>1 \times €12,000 = €12,000</math>. The total fee paid is €12,000.</p> <p>The Group pays a total fee of <math>€19,000 + €12,000 = €31,000</math>.</p>
<p><b>12. Biomass Producer, Trader and End-user in same Group</b></p> <p><b>Transaction description</b> The BP sells 100,000t of pellets with a claim to a Trader in the same Group of Companies.</p> <p>The Trader sells 100,000t of pellets with a claim to an End-user in same Group of Companies.</p> <p>The End-user consumes the biomass.</p>	<p><b>Fees due</b></p> <p>The BP's transaction fee is <math>€0.19 \times 100,000 = €19,000</math>. The total fee paid is €19,000.</p> <p>The Trader and End-User are in the same Group, so only pay 1 x fixed transaction fee = €12,000. Total fee paid is €12,000.</p> <p>The Group pays a total fee of <math>€19,000 + €12,000 = €31,000</math>.</p>
<p><b>13. Group sells self-manufactured biomass via trading company</b></p> <p><b>Transaction description</b> The BP sells 100,000t of pellets with a claim to a Trader in the same Group of Companies.</p> <p>The Trader sells 100,000t of pellets with a claim to a third party, outside of the Group.</p>	<p><b>Fees due</b></p> <p>The BP's transaction fee is <math>€0.19 \times 100,000 = €19,000</math>. The total fee paid is €19,000.</p> <p>No fixed transaction fee is due.</p> <p>The Trader pays the annual fee of €1,000.</p> <p>The Group pays a total fee of €20,000.</p>

<p><b>14. Group sells self-manufactured and purchased biomass via trading company</b></p> <p><b>Transaction description</b>  The BP sells 100,000t of pellets with a claim to the Trader in the same Group of Companies.</p> <p>The Trader buys 100,000t of pellets with a claim from a third party, outside the Group.</p> <p>The Trader sells 200,000t of pellets with a claim to a third party, outside of the Group.</p>	<p><b>Fees due</b></p> <p>The BP's transaction fee is €0.19 x 100,000 = €19,000. The total fee paid is €19,000.</p> <p>The Trader has bought and sold third party biomass, so the Group pays 1 x fixed transaction fee = €12,000. The total fee paid is €12,000.</p> <p>The Group pays a total fee of €19,000 + €12,000 = €31,000.</p>
<p><b>15. Group has multiple entities trading biomass</b></p> <p><b>Transaction description</b>  Trader 1, Trader 2 and Trader 3 are all members of the same Group of Companies.</p> <p>Trader 1 buys 100,000t of pellets with a claim from a third party and sells the biomass with the claim to another third party.</p> <p>Trader 2 buys 100,000t of pellets with a claim from a third party and sells the biomass with the claim to Trader 3.</p> <p>Trader 3 buys a further 100,000t of pellets with a claim from a third party and sells 200,000t with the claim to another third party.</p>	<p><b>Fees due</b></p> <p>As all of the Trader companies are members of the same Group of Companies, only 1 x fixed transaction fee is paid = €30,000.</p> <p>The Group pays a total fee of €30,000.</p>
<p><b>16. Group has multiple entities trading small volumes of biomass</b></p> <p><b>Transaction description</b>  Example is as per Scenario 14, except all three Trading companies are expected to trade a combined cumulative annual volume of 150,000t of biomass with a claim.</p>	<p><b>Fees due</b></p> <p>As all of the Trader companies are members of the same Group of Companies, only 1 x fixed transaction fee (less than 250,000t in the year) is paid = €12,000.</p> <p>The Group pays a total fee of €12,000.</p>
<p><b>17. Biomass Producer sells self-manufactured and purchased biomass to End-user in the same group transaction</b></p> <p><b>Transaction description</b>  The BP produces 100,000t of pellets with a claim and combines this with 200,000t of</p>	<p><b>Fees due</b></p> <p>The BP's transaction fee is €0.19 x 100,000 = €19,000. The total fee paid is €19,000.</p>

<p>pellets with a claim bought from a third party that is not in the group of the BP and the End-user.</p> <p>The BP sells 300,000t of pellets with a claim to an End-user in the same group of companies as the BP.</p> <p>The End-user consumes the biomass.</p>	<p>As the BP and End-user are in the same Group of companies, only 1 x fixed transaction fee is paid.</p> <p>The End-user pays the fixed transaction fee of €30,000 for 300,000t. The total fee paid is €30,000.</p> <p>The Group pays a total fee of €19,000 + €30,000 = €49,000.</p>
<p><b>18. Biomass Producer, Trader or End-user is registered on the DTS but does not make any claims</b></p> <p><b>Transaction description</b> A Certificate Holder / Company is added to the DTS but does not make a claim before the end of the calendar year / billing year.</p>	<p><b>Fees due</b></p> <p>The Certificate Holder / Company pays the annual fee of €1,000.</p>
<p><b>19. Certificate Holder has both Biomass Producer and End-user in its (single site) certificate scope and is consuming biomass with a claim produced on site, as well as consuming biomass with a claim purchased from third-party suppliers</b></p> <p><b>Transaction description</b> An End-user acting as a BP produces 60,000t of pellets with a claim and consumes these on-site.</p> <p>The same End-user purchases and consumes 150,000t of pellets with a claim from a third-party supplier.</p>	<p><b>Fees due</b></p> <p>The End-user acting as BP pays the transaction fee <math>€0.19 \times 60,000 = €11,400</math></p> <p>The End-user pays the fixed transaction fee of €12,000 for 150,000t.</p> <p>The total fee paid is €23,400</p>