

Sustainable Biomass Program

Webinar: Understanding the SBP documentation updates for REDIII - follow-up with details

3 April 2025



Welcome



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Housekeeping

Things to note for this webinar

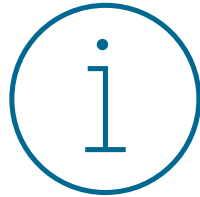
- › The recording of this webinar will be available during next week
- › Cameras and microphones are disabled during the webinar.
- › At the end of the presentations, we will have time to answer questions that will come through to the Q&A section of the webinar.



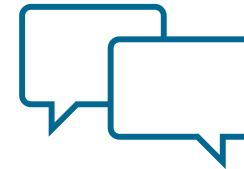
Today's objectives



To provide an update about where we are with REDIII solution in terms of timeline and action plan



To provide details about published DRAFT SBP EU RED documents for REDIII



To respond to the questions and prepare for the roll out of REDIII solution by May 2025

Reminder



SBP has a strategic objective to obtain and hold all relevant regulatory approvals including REDIII

EU RED compliance remains mandatory for all Certificate Holders when using SBP Standards version 2

Specific requirements including timelines are defined by European Commission and not SBP itself



Timeline



- Renewable Energy Directive (RED III) was published in the Official Journal of the EU on **31 October 2023**
- The Directive came into force 20 days following its publication in the Official Journal
- Member States have until **21 May 2025** to transpose and bring into force the laws, regulations and administrative provisions necessary to comply
- Same timeline applies to Voluntary Schemes for re-assessments by the EC
- Transition period is very short – please see next slide



SBP REDIII timeline for CHs and CBs



Draft revised SBP EU RED (REDIII) documents were published on 20 March 2025 on SBP website.

Final documents are expected in April. SBP is waiting for the final review and approval from EC.

Unless the EU replies on our request for clarification on rules for roll-out and implementation:

All SBP certificate holders with EU RED in their certificate scope shall update their management systems using the updated EU RED normative documents **by 21 May 2025**.

Certification Bodies will verify conformance during regular audits, starting **21 May 2025**.



SBP EU RED III – summary of requirements



High level

- EU RED is additional to main SBP standards
- Compliance is mandatory with Standards v2.0
- Sustainability criteria include sustainable harvest (legality, regeneration, biodiversity, soil quality, harvest levels, restricted areas) and LULUCF (forest carbon balance)
- Risk assessment remains the base for compliance
- Level A (=SBP RRA) or Level B (=CRA – Company Risk Assessment)
- TOF covered by agriculture criteria, definition of partial and full no-go areas No sustainability criteria for processing residues and post-consumer feedstock

Summary of changes – high level



New claim
SBP REDII-
Compliant => **SBP
EU RED-Compliant**

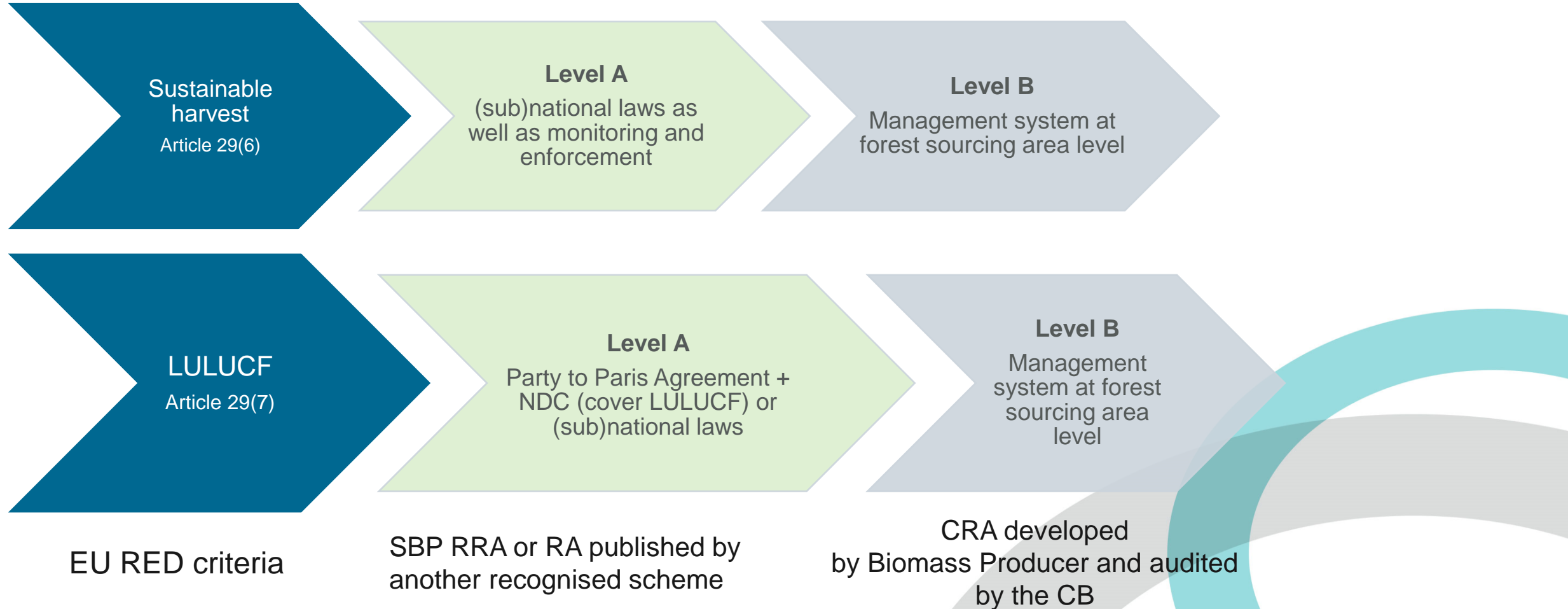
Revised
'sustainable
harvest' criteria by
introducing '**no-go
areas**' and '**partial
no-go areas**' (i.e.,
criteria for
agricultural
biomass) and
slightly amended
other points related
to sustainability

Minor changes
in Instruction
Document 6D
with regards to
**GHG
emission
savings
thresholds
and timelines**
(applicable for
End-Users)

Applicability
of EU RED
changed
**from 20 MW
to 7.5 MW**

**Principle of
Cascading use
of biomass** –
subject to further
clarifications
from EC and
Member States

SBP EU RED sustainability criteria – compliance



New EU RED claim



SBP EU RED Compliant

- Added 'EU'
- Removed 'II', generic 'RED' covers now both REDII and REDIII
- RED version (II or III) will be seen under the certificate scope
- Mixing of SBP REDII and REDIII is not an issue as a generic claim SBP EU RED is introduced
- DTS will be updated with the new **EU RED Compliant** claim on 21 May 2025

Forest biomass – amended sustainability criteria



- **Alignment with Agricultural Biomass:** Forest biomass criteria strengthened to align with those for agricultural biomass, including **similar ‘no-go’** areas and limitations.
- Introduction of ‘No-Go’ Areas for forest biomass sourcing: **‘primary forest’, ‘old growth forests’, ‘natural highly biodiverse grassland’** and **‘heathlands’**.
- Highly biodiverse forests, wetlands, peatlands, non-natural highly biodiverse grasslands are restricted areas: **harvesting is possible under conditions** (no drainage, no conversion, no negative impact)
- Compliance with **Harvesting Thresholds:** Harvesting must align with **country-specific** thresholds for clear-cuts, deadwood retention, and adhere to ecological guidelines.
- Minimizing Adverse Impacts: Logging activities should **minimize soil degradation** and protect biodiversity and habitats.



EU REDII and REDIII Article 29(6) comparative table



REDIII	REDII	Level of update
Sustainable harvesting criteria 29(6)		
(i) The legality of harvesting operations	(i) The legality of harvesting operations	None
(ii) Forest regeneration of harvested areas	(ii) Forest regeneration of harvested areas	None
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including wetlands, grassland, heathland and peatlands , are protected with the aim of preserving biodiversity and preventing habitat destruction	(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	Minor
(iv) That harvesting is carried out considering maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, that avoids harvesting of stumps and roots , degradation of primary forests , and of old growth forests and harvesting on vulnerable soils , that harvesting is carried out in compliance with maximum thresholds for large clear-cuts and ecologically appropriate retention thresholds for deadwood extraction	(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts	Major
(v) That harvesting maintains or improves the long-term production capacity of the forest	(v) That harvesting maintains or improves the long-term production capacity of the forest	None
(vi) ¹ Biomass fuel shall not be made from raw material obtained from the primary forest (there is no clearly visible indication of human activity) and old-growth forest (signs of former human activities may be visible)	N/A	New
(vi) ² Biomass fuel shall not be made from raw material obtained from highly biodiverse forests unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes	N/A	New
(vi) ³ Biomass fuel shall not be made from raw material obtained from highly biodiverse grassland unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland	N/A	New
(vi) ⁴ Biomass fuel shall not be made from raw material obtained from heathland	N/A	New
(vi) ⁵ Biomass fuel shall not be made from raw material obtained from wetlands and no longer has that status	N/A	New
(vi) ⁶ Biomass fuel shall not be made from raw material obtained from peatland unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil	N/A	New
(vii) That installations producing biomass fuels issue a statement of assurance that the forest biomass is not sourced from the lands referred to in point (vi)	N/A	New

Will be made available on SBP website

EU REDII and REDIII Article 29(7) comparison



REDIII	REDII	Level of update
LULUCF criteria 29(7)		
Is a Party to the Paris Agreement	Is a Party to the Paris Agreement	None
Has submitted a nationally determined contribution (NDC)	Has submitted a nationally determined contribution (NDC)	None
Has national or sub-national laws in place in accordance with Article 5 of the Paris Agreement	Has national or sub-national laws in place in accordance with Article 5 of the Paris Agreement	None

Prepare Level B for Article 29(6)

Harvesting Criteria – example from Denmark

SBP preliminary research indicates that Level A is **unlikely** to cover all sustainable harvest indicators in the countries covered by Regional Risk Assessments (RRAs), including Denmark, the Baltics, Canada, the US, and Vietnam.

Main reason: newly defined ‘no-go areas’ and ‘restricted areas’ not fully protected by law in the countries.

For example, logging in primary or old-growth forests may still be legally permitted.

Level B means BPs must develop and implement own management systems for sourcing sustainable biomass.

Please see risk conclusions from **DRAFT EU REDIII RRA for Denmark**



REDIII Level A risk assessment	Sub-scopes	
	Forests covered by Danish Forest Act	Forests not covered by Danish Forest Act
REDIII sustainability criteria		
Sustainable harvesting criteria 29(6)		
(i) The legality of harvesting operations	Level A	Level A
(ii) Forest regeneration of harvested areas	Level A	Level B
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including wetlands, grassland, heathland and peatlands , are protected with the aim of preserving biodiversity and preventing habitat destruction	Level A	Level A
(iv) That harvesting is carried out considering maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests and harvesting on vulnerable soils , that harvesting is carried out in compliance with maximum thresholds for large clear-cuts and ecologically appropriate retention thresholds for deadwood extraction	Level B	Level B
(v) That harvesting maintains or improves the long-term production capacity of the forest	Level A	Level B
(vi) ¹ Biomass fuel shall not be made from raw material obtained from the primary forest (there is no clearly visible indication of human activity) and old-growth forest (signs of former human activities may be visible) (no-go area)	Level B	Level B
(vi) ² Biomass fuel shall not be made from raw material obtained from highly biodiverse forests unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes	Level B	Level B
(vi) ³ Biomass fuel shall not be made from raw material obtained from highly biodiverse grassland unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland	Level A	Level A
(vi) ⁴ Biomass fuel shall not be made from raw material obtained from heathland (no-go area)	Level B	Level B
(vi) ⁵ Biomass fuel shall not be made from raw material obtained from wetlands , and no longer has that status	Level A	Level A
(vi) ⁶ Biomass fuel shall not be made from raw material obtained from peatland unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil	Level A	Level A
(vii) That installations producing biomass fuels issue a statement of assurance that the forest biomass is not sourced from the lands referred to in point (vi)	-	-

REDII Level A applicability for REDIII



REDIII sustainability criteria	REDII Level A applicability
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	Yes
(ii) Forest regeneration of harvested areas	Yes
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including wetlands, grassland, heathland and peatlands , are protected with the aim of preserving biodiversity and preventing habitat destruction	No
(iv) That harvesting is carried out considering maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, that avoids harvesting of stumps and roots , degradation of primary forests, and of old growth forests and harvesting on vulnerable soils , that harvesting is carried out in compliance with maximum thresholds for large clear-cuts and ecologically appropriate retention thresholds for deadwood extraction	No
(v) That harvesting maintains or improves the long-term production capacity of the forest	Yes
(vi) ¹ Biomass fuel shall not be made from raw material obtained from the primary forest (there is no clearly visible indication of human activity) and old-growth forest (signs of former human activities may be visible)	No
(vi) ² Biomass fuel shall not be made from raw material obtained from highly biodiverse forests unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes	No
(vi) ³ Biomass fuel shall not be made from raw material obtained from highly biodiverse grassland unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland	No
(vi) ⁴ Biomass fuel shall not be made from raw material obtained from heathland	No
(vi) ⁵ Biomass fuel shall not be made from raw material obtained from wetlands and no longer has that status	No
(vi) ⁶ Biomass fuel shall not be made from raw material obtained from peatland unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil	No
LULUCF criteria 29(7)	
Is a Party to the Paris Agreement	Yes
Has submitted a nationally determined contribution (NDC)	Yes
Has national or sub-national laws in place in accordance with Article 5 of the Paris Agreement	Yes

Guidance for risk mitigation measures (level B)

Risk mitigation key principles



- **Collaboration with suppliers and sub-suppliers up the supply chain is critical**
- **Risk mitigation usually needs to be applied at the forest level**
- **Delegating risk management to forest-level actors is often necessary**
- **Forest-level actors include forest owners and managers, forest logging contractors, and wood traders**



Guidance for risk mitigation measures (level B)

Evidence for risk mitigation



Some examples for risk mitigation measure verifiers:

- international and national databases
- official maps and satellite imaging
- forest management plans, operational protocols, and harvesting protocols
- results of relevant compliance audits and inspections
- Contractual agreements with suppliers



Please use guidance in SBP EU RED Bridging ID Annex C

List of updated documents



- **SBP EU RED Bridging ID**
- **SBP EU RED Principles ID**
- **SBP Instruction Document 6D**
- **Certification Body RED Audit Report template**
- **SBP Regional Risk Assessments (internal revision, does not need EC approval)**
- **Proof of Sustainability for the delivery of biomass fuels**

Documents

Normative documents

Normative documents for SBP Standards v2.0

SBP Standards v2.0

Instruction Documents for SBP Standards v2.0

SBP Regional Risk Assessments

Templates for Standards v2.0

EU RED documents

EU REDII documents

EU REDIII draft documents

Flanders documents

French documents

Japan documents

Netherlands documents

Vietnam documents

Normative documents for SBP Standards v1.0

Guidance documents

BLE and Nabisy

Interpretative documents

Q&As: SBP Standards v2.0

Process and policy documents

EU REDIII draft documents

Instruction Document EU RED: Bridging Requirements for Meeting the Revised Directive EU/2018/2001

This Instruction Document specifies bridging requirements between the current SBP normative framework and revised Renewable Energy Directive 2023/2413 (REDIII).

[View Document](#)

Publication Date: 20/03/2025
Version: 2.0

Instruction Document EU RED: Principles for Management of EU RED Scheme

This Instruction Document specifies the SBP scheme principles and internal management system for REDIII. It also provides further details on the implementation of some important policies and procedures.

[View Document](#)

Publication Date: 20/03/2025
Version: 2.0

Instruction Document 6D: Methodology for the Calculation and Certification of GHG Emissions Savings for EU RED

This Instruction Document is optional within the SBP Framework, but is mandatory to Certify Holders that need to perform greenhouse gas (GHG) emissions savings calculations in accordance with the revised EU Renewable Energy Directive 2023/2413 (REDIII).

[View Document](#)

Publication Date: 20/03/2025
Version: 2.0

Certification Body Audit Report Checklist

This is the checklist to be used by auditors together with the CB Public Summary Report Template v1.6 for evaluation of SBP EU RED requirements.

[View Document](#)

Publication Date: 20/03/2025
Version: 1.4

Planning (updated April 2025)



Activity	Timeline	Status
SBP revised SBP EU RED ID and submitted to EC	Q4 2024	Done
EC reviewed and approved submitted documents ¹	Q1 2025 (expected April 2025)	Ongoing
SBP published DRAFT revised SBP EU RED documents	Q1 2025	Done
SBP published revised approved SBP EU RED documents ²	Q1 2025 (expected April 2025)	Planned
SBP published updated RRAs (EU REDIII Annexes)	Before 21 May 2025	Ongoing
All relevant Certificate Holders updated their management systems against revised SBP EU RED documents	By 21 May 2025	Planned
All relevant Certificate Holders are audited by Certification Body against revised SBP EU RED documents	During regular surveillance audit starting from 21 May 2025	Planned

¹ May require further amendments in SBP EU RED documentation subject to EC review

² This includes necessary updates in DTS and Audit Portal



Q&A

Thank you!



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