

## Response ID ANON-FUAF-64B9-7

Submitted to Common Biomass Sustainability Framework Consultation  
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### About you

1 What is your name?

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3 Are you responding as an individual or on behalf of an organisation?

Organisation

Organisation:  
The Renewable Energy Association (REA)

### Responding on behalf of an organisation

4 Please select which sector your organisation is part of from the list below.

Please select which sector your organisation is part of from the list below.:  
TA - General

5 Which organisation are you responding on behalf of?

Which organisation are you responding on behalf of?:  
The Renewable Energy Association (REA)

### About you part 2

6 We usually publish a summary of all responses, but sometimes we are asked to publish the individual responses too. Would you be happy for your response to be published in full?

Yes, but without identifying information

7 How did you hear about this consultation?

How did you hear about this consultation?:  
Email from this department

Other (please specify):

### Executive Summary

#### Chapter 1: A Common Biomass Sustainability Framework: Part 1

8 Do you agree that the initial scope of the framework should be limited to bioenergy that is subject to government incentive schemes?

Somewhat agree

If you agree, please state why, providing evidence where appropriate:

The framework should ideally be applicable to all bioenergy projects, regardless of technology and business model. It must be built on fundamental principles of sustainability, capable of determining the sustainability of any bio-based project. Neutrality will futureproof its design, such that it can complement all projects (subsidised and unsubsidised) and all markets (voluntary and compliance).

Unsubsidised bioenergy projects are already operational - funded by long-term corporate offtake agreements for these products and their carbon benefits. To stimulate more of these unsubsidised projects – and thus stimulate green growth without Government spending – it is essential for their sustainability to align with Government policy. Corporate offtakes seek assurance that their green investments will be recognised and approved by Government. This certainty derisks investment decisions, driving growth and the green transition.

However, since it is to be first delivered as a policy document (see Q2 response), it is acceptable to initially sequence this approach to subsidised/incentivised supply chains and feedstocks. A narrower initial scope enables government to set expectations quickly, while avoiding delays that could arise from attempting to design a single framework covering all uses from the outset.

This approach should include an explicit pathway and timetable for broadening the application to non-subsidised/incentivised bioenergy uses. It must be clearly articulated that policy will not enable the desirable cross-sector scope for universal sustainability standards regardless of government schemes – only legislation will.

If you disagree, please explain why, providing evidence where appropriate?:

9 Do you agree that the common criteria should be delivered as a policy document and implemented through the relevant legislative or contractual frameworks of each individual biomass policy?

Somewhat agree

If you agree, please state why, providing evidence where appropriate:

In order to standardise applicability across the sector regardless of subsidisation, the criteria would ideally require legislation in line with ongoing schemes. However, due to the need for immediate progress on ETS and SAF, first delivering the framework as a policy document is justifiable. Strong guidance without ambiguity on how to formulate and update schemes would be necessary, as is a robust timetable for transitioning to legislative means. Legislation is the ultimate objective; staunchly applying the framework beyond subsidised projects would not be possible without it.

As was discussed in Q1, sustainable sourcing and production of biomass is the key priority. This applies whether taxpayer money is contributed or not. To best prioritise sustainability without legislation for the time being, Government policy must articulate measures to support and standardise principles for unsubsidised projects in equal measure to subsidised projects. Doing so will additionally require tracking capabilities to ensure a level playing field across the sector. Without such action, encouraging a widespread growth-driven path toward a sustainable net-zero transition will be stifled.

However, more comprehensive explanation is required to clarify implementation and enforcement. First, there must be a uniform standard across Government departments to streamline, incorporate, and enforce principles and procedures regarding the framework. Second, the framework needs to be complimentary to existing agreements within industry - that which many of our members are signed up for - to avoid disruption and undermining investor confidence. Third, how standards are meant to be implemented with or without incentive schemes should be expressed: for example, if GHG is set by the incentive scheme, how might other requirements be set or communicated without an incentive scheme? Lastly, there must be further articulation as to this policy document's preservation through political cycles, including proof of safeguards.

Utilising the Common Sustainability Framework as a policy document can kickstart proportional, cross-cutting standards and sustainable biomass production if the above explications are made. Doing so should reinforce existing schemes and prime the sector for legislation in the future.

If you disagree, please explain why, providing evidence where appropriate?:

10 Should government consider a legislative route for implementing the common sustainability framework in the future, including expanding it for non-subsidised uses?

Yes

Additional comments:

First keeping the Common Sustainability Framework (CSF) as a policy document, rather than embedding it in primary legislation, is likely to enable faster development and implementation, allowing Government and industry to iterate based on experience and emerging evidence. The government schemes it currently informs are already underpinned by existing legislation or regulatory frameworks, so a strong policy framework can complement these without the delays inherent in the legislative process. Furthermore, a policy document has greater capacity to adapt to new demands, innovations, and requirements in the bioenergy sector, with more potential to efficiently and effectively update its framework according to these developments.

However, there are important longer-term considerations if the CSF is to apply beyond subsidised uses, and a legislative route would provide additional certainty, consistency and durability, particularly when sustainability standards need to be upheld across the entire bioenergy sector, including commercial, voluntary, or future market-driven deployment that falls outside current support schemes.

As such, while presently formatting the framework as a policy document is wise to encourage adaptable, timely progress on bioenergy integration, pursuing a legislative route through an explicit timetable and planning measures will best reinforce the requirement for sustainable sourcing and production across 'subsidised' and unsubsidised projects in the sector. See Q1-2 responses for further elaboration.

If you disagree, please explain why, providing evidence where appropriate?:

## A Common Biomass Sustainability Framework: Part 2

11 What are your views on the role of the Biomass Suppliers List (BSL) post RHI and how government should frame the relationship between the common framework and BSL in relation to sustainability requirements?

What are your views on the role of the Biomass Suppliers List (BSL) post RHI and how should government frame the relationship between the common framework and BSL in relation to sustainability requirements?:

The Common Biomass Sustainability Framework (CBSF) should establish the core principles, standards and requirements for biomass sustainability across all feedstocks, irrespective of end use. It should serve as the central architecture of UK sustainability policy, providing a single, coherent framework against which compliance is assessed. In doing so, it should also explicitly safeguard fuel quality, particularly for smaller appliances, as this is integral to ensuring that biomass use is genuinely sustainable in practice.

The existing Biomass Suppliers List (BSL) can then operate as a recognised delivery mechanism to demonstrate compliance with the CBSF. Compliance should be evidenced through independent certification schemes such as ISCC or BSL-style registries capable of offering a UK-specific product aligned to the CBSF, similar to how the RTFO recognises approved voluntary schemes such as REDcert and ISCC EU.

The BSL remains a widely used and familiar pre-approval and MRV route for smaller heat users under the RHI and should therefore be retained. Its established quarterly reporting and risk-based audit processes could support a smooth transition to the CBSF. To avoid duplication and unnecessary administrative burden, fuels approved under the CBSF should be recognised as compliant across schemes, including closed schemes, so that suppliers are not required to maintain parallel BSL and CBSF registrations.

## A Common Biomass Sustainability Framework: Part 3

### Review and Updates to the Common Framework

12 Do you agree that the updated policy guidance document should be published every 5 years?

Somewhat disagree

If you agree that the updated policy guidance document should be published every 5 years, please provide evidence to support your response or an alternative proposal for review timelines. :

If you disagree that the updated policy guidance document should be published every 5 years, please provide evidence to support your response or an alternative proposal for review timelines. :

It is essential that a Common Biomass Sustainability framework remains aligned with the latest scientific evidence and responsive to the UK's evolving climate, land-use and net zero pathways. Regular review is therefore necessary to maintain environmental integrity and policy credibility.

However, experience — including under the EU Renewable Energy Directive — shows that a fixed five-year update cycle can create unintended instability. Biomass supply contracts and associated investment decisions, particularly for internationally traded feedstocks such as wood pellets, are typically made on a 10–15-year basis. In practice, a five-year cycle is shorter than it appears: consultations, scheme revisions and audit transitions can result in near-continuous regulatory change, weakening investor confidence and increasing delivery risk.

A balanced approach would therefore distinguish clearly between review and update. A 10-year formal update cycle would provide regulatory durability aligned with long-term contracts and support mechanisms, while five-year evidence reviews could assess new science and market developments without triggering automatic change. Updates should be evidence-led and targeted, with flexibility to make technical amendments where justified. This approach preserves scientific responsiveness while avoiding unnecessary policy churn, and recognises that some feedstock supply chains are inherently more dynamic than others.

## Chapter 2: Biomass Feedstock Categories & Definitions

13 Do you agree with the list of key feedstock categories and their definitions in scope of the common framework?

Somewhat disagree

If you agree, please state why, providing evidence where appropriate:

If you disagree, please outline which feedstock categories and their definitions you disagree with and why? :

The list of key feedstock categories and their definitions requires some revision to ensure clarity, proportionality, and alignment with practical supply chain realities. We welcome the acknowledgment that the table is not exhaustive and that further guidance will be provided by relevant authorities as schemes adopt the framework.

Crop-based feedstocks:

The current table separates feedstocks into “Energy crops,” “Other crops,” and “Short Rotation Forestry,” but does not clearly recognise purpose-grown annual rotational crops for bioenergy, such as maize, barley, or rye. These crops can be cultivated under contract for anaerobic digestion or biomethane, integrated into managed rotations that deliver soil, nutrient, and biodiversity benefits. End use for mainstream crops is often determined downstream by market demand, making it difficult to assign sustainability characteristics at the point of production. We recommend introducing a distinct “Rotational crops” sub-category to capture purpose-grown annual crops for bioenergy, ensuring domestic UK feedstocks are treated proportionately and distinguished from imported or higher-iLUC risk crops. This aligns with REDIII's inclusion of “intermediate crops” as sustainable feedstocks for advanced biofuel production.

Waste and residues:

Grade C waste wood, including post-consumer wood, should be clearly defined as “waste” rather than conflated with “woody biomass,” to maintain proportionality, regulatory clarity, and appropriate sustainability treatment.

Sawmill residues, such as slabwood, are co-products arising from processing and should not be treated as waste. While classified as waste by EA/SEPA/NRW, they are inherently low risk and could be considered “deemed sustainable,” similar to arboricultural arisings. Sawmill residues are lower-value products and no saw log quality timber would be diverted, as sawn timber is maximised at production. Use could be monitored via sawmill residues and arboricultural arisings price indices. Clarification is also needed on whether residues from hedge and hedgerow management—such as crown lifting, pollarding, and trimming—should be classed as arboricultural residues and exempt from land criteria or treated as “deemed sustainable.” Visits to sawmills could demonstrate these practices and support appropriate categorisation.

Additionally, the definition of waste should be standardised across permitting and energy schemes, as current divergences with EA/SEPA/NRW requirements have caused practical challenges for operators. Clear, harmonised definitions that align with classifications in waste transfer notes will reduce ambiguity and support consistent implementation under the common framework.

Aligning the feedstock categories with established reporting frameworks, such as Ofgem’s, which distinguish “waste,” “biomass wholly derived from waste,” and other processing and forestry residues, would promote regulatory certainty, consistency, and robust sustainability standards, particularly for domestic feedstocks.

### Chapter 3: Land criteria (Agricultural Land criteria)

#### Direct land use change (DLUC): Prohibited land categories

14 Do you agree that the agricultural land criteria should continue to include prohibited land categories in line with existing criteria?

Somewhat agree

If you agree, please state why, providing evidence where appropriate:

Broadly agree. There should be further consideration for a rotational crop classification, as well as an exemption for waste and residues, livestock manure, and slurries that do not directly impact the land.

If you disagree, please explain why, providing evidence where appropriate?:

15 Do you agree that the baseline should be set in January 2008?

Yes

If you agree, please state why, providing evidence where appropriate:

This is appropriately standardised and internationally recognised.

The January 2008 date has become the industry recognised standard date for some time now and most industries acknowledge this date as being a suitable baseline to work from. There is also increasing use of ‘20-years prior to sourcing’ as an alternative baseline, which is consistent with the approach in REDIII. REA members see benefits to retaining January 2008, in line with existing criteria such as the RO, or widening the baseline to ‘January 2008 or 20-years prior to sourcing, whichever is later’.

A future challenge for the UK and EU countries will be with areas of land increasingly not being agriculturally managed or farmed, resulting in greater biodiversity and more land meeting the prohibitive land criteria and become prohibitive land types over time, e.g. land unmanaged/farmed will ultimately become biodiverse grassland areas. This could mean that, in addition to the already restricted 2008 land area, the amount of future land area able to be used for bioenergy production will require reviewing at some future point as land will increasingly fall into one of the prohibited land categories.

If you disagree, please state why, and what should the baseline be set at?:

#### Prohibited Land Categories: Areas of high biodiverse value

16 Do you agree with the definitions of the highly biodiverse land categories given?

Somewhat agree

If you agree, please state why, providing evidence where appropriate:

It is wise to align with EU regulations and UK practice.

There may be clarification regarding the categorisation of ‘highly biodiverse grassland’, on account of climatic differences and harvest/maintenance techniques.

To avoid misinterpretation and confusion with the forest criteria, Table 3.3 should make it explicitly clear that the definitions and proposed sourcing requirements only apply to feedstocks which are required to meet the agricultural land criteria. Noting that highly biodiverse land categories and high carbon stock land categories are not mutually exclusive. The framework could provide further clarity by combining Table 3.3 and 3.4. to create one table of ‘important ecological value’.

If you disagree, please explain why, providing evidence where appropriate?:

17 Do you agree with the list of protected highly biodiverse land categories where sourcing is not allowed?

Somewhat agree

If you agree, please state why, providing evidence where appropriate:

Aligning with EU regulations and UK practice. There may need to be clarification in future regarding the recovery of diseased timbers for bioenergy purposes from protected land categories.

If you disagree, please explain why, providing evidence where appropriate?:

18 Do you agree with the list of protected highly biodiverse land categories where sourcing is allowed if sufficient evidence of no harm to the area of land can be provided?

Somewhat agree

If you agree, please state why, providing evidence where appropriate:

If robust evidence of no harm to the land can be provided. The Framework should provide specific guidance on how sufficient evidence of no harm to the area of land being used should be provided, and within what timescale.

If you disagree, please explain why, providing evidence where appropriate?:

19 Should other highly biodiverse land categories be added?

No

Please explain your answer:

Prohibited Land Categories: Areas of High Carbon Stock

20 Do you agree with the definitions of high carbon stock land categories given?

Somewhat agree

If you agree, please state why, providing evidence where appropriate:

Align with EU regulations and UK practice.

To avoid misinterpretation and confusion with the other land criteria, Table 3.4 should make it explicitly clear that the definitions and proposed sourcing requirements only apply to feedstocks which are required to meet the agricultural land criteria. Noting that highly biodiverse land categories and high carbon stock land categories are not mutually exclusive. The framework could provide further clarity by combining Table 3.3 and 3.4 to create one table of 'important ecological value'.

If you disagree, please explain why, providing evidence where appropriate?:

21 Do you agree with the list of protected high carbon stock land categories, where sourcing is not allowed?

Somewhat agree

If you agree, please state why, providing evidence where appropriate:

There may need to be additional clarification on soil drainage safeguards from high carbon stock land.

Also there are circumstances where wetlands can be used sustainably, for example in the case of flood prevention uses or water remediation activities. The framework should consider the inclusion of clear exemptions for scenarios where biomass can be sourced sustainably and result in favourable or enhanced sustainability outcomes compared to if sourcing was not permitted.

If you disagree, please explain why, providing evidence where appropriate?:

22 Do you agree that sourcing should be allowed from peatlands if evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil?

Strongly disagree

If you agree, please state why, providing evidence where appropriate:

If you disagree, please explain why, providing evidence where appropriate?:

Undrained peatland must remain uncultivated to protect it as a carbon sink. Draining peatland for any crop, including bioenergy, is unsustainable due to high GHG emissions. Any cultivation of drained peatlands, whether before or after 2008, releases carbon and depletes these soils.

The Framework's LCA must account for soil carbon changes, fairly quantifying the true carbon impact of bioenergy. Biomass from eligible drained peatlands will likely exceed GHG thresholds, making it ineligible. The LCA does not restrict farming choices but encourages practices that protect soil carbon and reduce emissions. Where carbon loss is too high for mitigation, peatlands cannot sustainably produce bioenergy.

This LCA approach applies to all soils, promoting low-carbon farming. Food production, often on peatlands, also has high carbon intensity but is treated as preferable despite bioenergy's role in energy security and net zero goals. In the UK, the peatlands are commonly used to grow high-value food crops, such as salad leaves and herbs, yet carbon intensity of this production would be incredibly high – particularly when considering gCO<sub>2</sub>e/MJ (i.e. GHG emissions per calory).

Overall, any cultivation on peatlands is unsustainable. Government policy should incentivise re-wetting and protection of these high-carbon soils rather than allowing their use for bioenergy. Government should be supporting farmers to protect this high carbon stock land, incentivising them to re-wet it, protect it, and not cultivate it.

23 Should other high carbon stock land categories be added?

No

If you agree, please state why, providing evidence where appropriate:

Indirect Land Use Change (ILUC): Part 1

24 Should the crop cap be set at a sector level subject to sector specific ILUC risk assessments?

Yes

If you agree, please state why, providing evidence where appropriate:

25 If crop caps are set at a sector level, what factors should be included in the sector-specific food competition and ILUC risk assessment? Please provide evidence to support your response.

If crops caps are set at a sector level, what factors should be included in the sector-specific food competition and ILUC risk assessment?:

The crop cap should be set at a sector level with sector-specific ILUC risk assessments, not as a single cross-sector cap. A cross-sector cap is a blunt instrument that risks ignoring sector specific benefits, soil health, and methane-avoidance from wastes/manures. Without transparent data, it could drive perverse outcomes, such as switching to imported feedstocks with weaker traceability.

Sustainability depends on how crops are grown, not the crop itself. Annual crops grown as break crops can enhance soil health, manage pests, and maximise yields without displacing food. Land can support both food and energy production, and reduced livestock demand under the net-zero transition will free up land for alternative uses. Crop caps should not penalise feedstocks with environmental and economic benefits; incentive schemes should determine their necessity. Clear triggers, review cycles, and exemptions for low-ILUC-risk crops should be applied, with transparent publication of evidence.

The limitations of ILUC as a long-term, measurable framework must be recognised. Current ILUC assessments rely heavily on modelling assumptions, which can overstate or misrepresent actual land-use impacts and lead to disproportionate conservatism in policy setting. An independent academic ex post review of evidence from the US and Brazil on impacts of UK policy on land management shows that corn ethanol expansion did not drive significant ILUC in soybean cultivation, suggesting ILUC effects may be lower than assumed. As such, the REA strongly believes more consultation on the role of ILUC in the framework should be conducted as these studies emerge, to ensure risk classifications remain evidence-based and proportionate and policy is based on sound science and balanced risk anticipation.

At a sector level, crop caps aim to manage the risk of land use change from food to bioenergy production. Different feedstocks have varying impacts on land use, so sector-specific assessments are needed rather than universal caps.

Purpose-grown perennial biomass (e.g., woody crops, miscanthus, SRC) is typically cultivated over several years on the same land, while annual crops offer greater flexibility; both types of feedstocks have varying potential impacts on food production and land use. Sector-specific caps should reflect these differences, applying limits where the risk of food displacement or ILUC is significant. Auditable evidence from farm records or management plans can support compliance.

DEFRA's agricultural land classification (ALC) grades farmland from 1 (best) to 5 (poorest) based on climate, site, and soil, determining its versatility and yield potential. Grades 1, 2, and 3a are considered "Best and Most Versatile" (BMV) land and are commonly used to grow annual crops – top three: wheat, barley, and sugar beet – primarily for food or feed.

What should the sector-specific food competition and ILUC risk assessment consist of? :

A sector-specific food competition and ILUC risk assessment should consider:

- The quality of land being used.
- How long land is dedicated to bioenergy production.
- The feasibility of changing land use in the future.

- Whether food production and storage levels are decreasing.
- Trends in food waste.
- Whether food prices are affected by supply-demand gaps or broader inflation.
- The area of land subject to restrictions over time.

A robust sector-specific approach ensures that crop caps are proportionate to the risk posed by different feedstocks, while maintaining flexibility for the wider agricultural system.

26 What factors should be monitored at a cross-sector level to highlight emerging risks regarding food competition and ILUC risks from crop derived feedstocks?

What factors should be monitored at a cross-sector level to highlight emerging risks regarding food competition and ILUC risks from crop derived feedstocks?:

While monitoring is best undertaken at a sector level, any cross-sector oversight should focus on clear, high-level indicators that signal emerging food competition, while also facilitating sustainable biomass production in line with strategic priorities.

Cross-sector indicators could include:

- Significant changes in national production of key food crops for reasons unrelated to yields or purely agricultural economics.
- Year-on-year changes in the area of prohibited or protected land.
- Changes in national food storage levels, adjusted to account for short-term yield shocks (e.g., drought or flooding).

Land-use decisions are primarily driven by farmer economics, with more productive land typically directed to food production and less productive land supporting alternative uses. Monitoring should therefore track structural shifts in land allocation rather than assume displacement, ensuring risks are identified early while enabling appropriate growth in sustainable biomass supply.

## Indirect Land Use Change (ILUC): Part 2

27 How could high ILUC risk feedstocks be identified? Please suggest what factors could be considered and provide evidence to support your response.

How could high ILUC risk feedstocks be identified? Please suggest what factors could be considered and provide evidence to support your response. :

High ILUC-risk feedstocks should be identified in a way that is evidence-based, proportionate, and aligned with international approaches, while avoiding unnecessary constraints on sustainable biomass supply. Given recent academic work on ex-post analysis on land use change, identifying high iLUC risk is unlikely to be reliably predicated on iLUC models.

This is particularly important given the underlying assumptions within ILUC modelling around food displacement and land-use change, which may not always reflect real-world market dynamics and evolving agricultural systems.

With growing demand for biomass to meet climate objectives, including Sustainable Aviation Fuel (SAF) and BECCS deployment, the framework must support supply expansion where it is demonstrably sustainable.

Alignment with EU definitions would promote regulatory coherence and reduce trade friction across international supply chains. Any UK-specific ILUC modelling should be transparent, evidence-based, and subject to periodic review as new data emerge. Crucially, the framework should remain adaptive, ensuring that genuinely high-risk pathways are addressed without creating barriers to sustainable, well-governed biomass supply needed to meet net zero goals.

28 Should high ILUC risk feedstocks be phased out?

No

If you agree that high ILUC feedstocks should be phased out, please provide a timeframe and state if it should be at a cross-sector or individual sector level. Please provide evidence to support your response and explain how this could be done in compliance with international rules, e.g. WTO compliance.:

The REA does not support a blanket phase-out of "high ILUC risk" feedstocks under the current framework.

The current emphasis on ILUC risks placing disproportionate weight on speculative, modelled impacts rather than observable sustainability criteria (e.g. soil carbon protection, land governance, traceability).

Instead of a phase-out, a more proportionate approach would be:

- A transparent low/high ILUC risk screening;

- Recognition of low-risk production pathways;
- Regular review of classifications as new evidence emerges.

If restrictions are introduced, they must be applied cross-sectorally and in a non-discriminatory, evidence-based manner to ensure WTO compliance.

Further consultation is warranted to ensure ILUC policy remains proportionate, science-based and responsive to emerging empirical evidence.

If you do not think high ILUC feedstocks should be phased out, please state why, providing evidence where appropriate:

### Indirect Land Use Change (ILUC): Part 3

29 Are there other approaches (beyond those suggested previously) that should be considered to limit ILUC impacts of bioenergy feedstocks, in particular with regards to competition with food?

22. Are there other approaches (beyond those suggested above) that should be considered to limit ILUC impacts of bioenergy feedstocks, in particular with regards to competition with food?:

In considering additional approaches to limit ILUC impacts, it is important that policies do not inadvertently discourage the wider co-benefits of sustainable biomass supply, including for GHG removals. Biomass production can support more productive use of less productive land, add value within diverse arable rotations, and deliver environmental benefits — particularly where perennial crops enhance biodiversity through reduced soil disturbance (as evidenced in studies collated by Biomass Connect).

Rotational break crops within food-dominated systems should be recognised as a low-ILUC pathway. These crops support long-term food production on the same land rather than displacing it. Where a break crop is used for biomethane, it valorises a crop already required to maintain soil health and productive, climate-resilient food rotations — delivering bioenergy alongside sustained food output.

Farm profitability is central to food security. Providing viable markets for rotational or alternative crops helps maintain agricultural land in long-term production. If farming becomes unprofitable, there is a greater risk that productive land is permanently removed from agriculture (e.g. through development or non-agricultural land use), which would present a more significant and irreversible land-use change risk than sustainable bioenergy production.

30 Are there any other issues (e.g. social or other environmental) that should be considered as part of the agricultural land criteria?

Are there any other issues (e.g. social or other environmental) that should be considered as part of the agricultural land criteria?:

Agricultural land criteria should explicitly recognise the social dimensions of land use in UK rural communities. Decisions about biomass, food production, forestry, or solar deployment all affect farm viability, rural employment, and local economies. Farmers need a range of viable options to keep their businesses profitable and resilient; sustainable crop production for bioenergy can form part of that mix. Bioenergy and social objectives should not be viewed as being at odds.

A balanced framework should acknowledge that maintaining land in productive agricultural or forestry use supports rural livelihoods, supply chains, and skills. Where farm incomes are constrained, producers may turn to alternative land uses. The objective should not be to favour or discourage specific sectors, but to ensure farmers retain economically sustainable choices that keep land in active management.

The social benefits of sustainable forest management and waste management are also often under-recognised. Active woodland management supports rural jobs, improves habitat condition, and maintains domestic timber supply chains. Similarly, waste-derived biomass supports local employment, resource efficiency, and circular economy activity across rural and peri-urban areas.

Alignment with the Sustainable Development Goals should therefore consider not only climate (SDG 13) and biodiversity, but also zero hunger (SDG 2), affordable and clean energy (SDG 7), and decent work and economic growth (SDG 8). Access to energy, job creation, rural resilience, and environmental protection are interlinked objectives. With proportionate safeguards, they can be delivered together rather than treated as competing priorities.

### Feedstocks in Scope of Agricultural Land Criteria

31 Do you agree that, unless otherwise specified, all feedstocks should have to comply with the agricultural land criteria?

Somewhat agree

If you agree, please state why, providing evidence where appropriate:

There should, however, be consideration for exempting genuine waste and residues from the agricultural land criteria.

If you disagree, please explain why, providing evidence where appropriate?:

32 Should dedicated energy crops be required to meet the agricultural land criteria?

Yes

If you agree, please state why, providing evidence where appropriate:

All purpose-grown feedstocks should meet agricultural land criteria. If farmland is being used to cultivate biomass for energy production – albeit perennial or annual, and edible or inedible – the feedstock must meet specific agricultural land criteria. These criteria should be consistent across all different types of biomass.

If you disagree, please explain why, providing evidence where appropriate?:

33 Do you have evidence regarding the impact of requiring energy crops to meet the agricultural land criteria? We are particularly interested in potential impacts on planting targets and spatial distribution of energy crops.

26. Do you have evidence regarding the impact of requiring energy crops to meet the agricultural land criteria? We are particularly interested in potential impacts on planting targets and spatial distribution of energy crops. :

Requiring energy crops to meet agricultural land criteria is unlikely to materially constrain planting targets if applied proportionately and could improve spatial targeting and environmental outcomes. Evidence from the UK and internationally shows that dedicated perennial energy crops—such as miscanthus and short rotation coppice (SRC)—can deliver clear benefits for soil carbon, biodiversity, water quality, and erosion control, particularly when grown on less productive or marginal agricultural land. Their low input requirements and long rotation lengths distinguish them from high-input annual crops and reduce risks associated with land use change.

Applying agricultural land criteria may help steer planting towards lower-risk, more suitable sites, supporting better alignment with wider land-use objectives, and avoiding conflicts with food production. This is consistent with findings from the Environmental Audit Committee, which highlight the importance of clear policy signals, improved spatial targeting, and recognising productive planting as complementary to nature's recovery and net-zero goals.

However, evidence also suggests that treating all energy crops as a homogeneous category risks unintended barriers, particularly perennial crops that can improve environmental outcomes relative to conventional agriculture. To avoid slowing planting rates or deterring investment, criteria should clearly differentiate between crop types and be supported by clear guidance and incentives that recognise the multiple benefits of perennial systems, including their role in multi-purpose land use. Done well, this approach should support — rather than undermine — the scale and geographic spread of energy crop deployment.

## Compliance with the Agricultural Land Criteria

34 Should the types of evidence for demonstrating compliance with agricultural land criteria be kept aligned with existing criteria?

Yes

If you agree that the types of evidence for demonstrating compliance with agricultural land criteria should be kept aligned with existing criteria, please state why, providing evidence where appropriate:

Keep evidence aligned with existing criteria.

If you disagree that the types of evidence for demonstrating compliance with agricultural land criteria should be kept aligned with existing criteria, please outline what changes should be made.:

35 Please highlight any specific cost implications to your business/sector in meeting the proposed agricultural land criteria. Please provide evidence to support your response.

Please highlight any specific cost implications to your business/sector in meeting the proposed agricultural land criteria. Please provide evidence to support your response. :

Specific cost implications may include data collection, audits, and certification, which could deviate between small and large operators.

For example, for large operators, sampling costs and validating should cost in the region of £2 - £5/tonne per year of biomass. This would be a typical cost for feedstock auditing/assessment/verification reports in the UK sector (See Brown & Co, Fisher German, Carter Jonas, and Savills).

For smaller operators, proportional costs will be higher.

## Policy Proposals: Soil Criteria

36 Do you agree that the land on which the raw feedstock was grown should be subject to soil monitoring and management plans?

Strongly agree

If you agree that the land on which the raw feedstock was grown should be subject to soil monitoring and management plans, please state why, providing evidence where appropriate:

Soil monitoring and management plans are essential for the sustainable growth of biomass – and farming more broadly. Requirements for soil management plans are now well established across both the compliance and voluntary markets. This is a good example of how the bioenergy market can provide the sustainability framework and economic drivers necessary to support farmers' transition to more sustainable practices. Protecting and

restoring soil health is critical for all sustainable farming, from ensuring a resilient and low-carbon supply of feedstock to assuring the sustainability of unsubsidised biomethane to its customers.

ISCC requires farms to run a documented, expert-reviewed soil management system that safeguards soil quality, limits contamination, and controls erosion and compaction. In accordance with the ISCC standard, soil management plans must:

- Cover (i) erosion control, (ii) nutrient balance, (iii) soil organic matter, (iv) pH, (v) structure, (vi) biodiversity, (vii) salinisation risk, (viii) water holding capacity, (ix) base saturation and (x) soil organic carbon – tailored to local soils, climate and topography.
- Be approved and periodically reappraised by a competent agronomy professional, with implementation validated through soil analyses and checks that specified measures are followed.
- Evidence targeted erosion and compaction measures (e.g. appropriate tillage and machinery, crop rotation, cover/intermediate crops with high ground cover, and special strategies for sloping or fragile soils), supported by maps and field inspections.

If you disagree that the land on which the raw feedstock was grown should be subject to soil monitoring and management plans, please state why, providing evidence where appropriate.:

37 Are there any additional aspects that should be included in the soil criteria? Please explain what these are, how they could be implemented and the rationale for inclusion.

Are there any additional aspects that should be included in the soil criteria? Please explain what these are, how they could be implemented and the rationale for inclusion.:

Requiring soil management and monitoring plans is a key baseline for farm-based biomass. These plans help identify soil issues, risks, and opportunities for improvement without mandating specific actions. Incorporating soil carbon change into lifecycle assessments (LCA) is critical to accurately quantify GHG emissions and incentivise farmers to adopt practices that improve soil health while accessing higher-value markets for low-carbon biomass.

To complement mandatory requirements, non-binding best practice principles can guide longer-term improvements, signalling Government ambitions and supporting investment decisions.

For example, the Bioenergy Crop Charter for UK Growers sets out best practice for rotational crops, including soil health and nutrient management actions such as maintaining soil management plans, minimising compaction and erosion, using cover crops, optimising nutrient applications, and monitoring soil organic matter. While non-mandatory, such frameworks help farmers improve environmental outcomes and soil quality while maintaining the commercial viability of their operations.

Biomass Connect has published materials on planning-related good practice such as environmental impact screening and local biodiversity records — not legally binding but recommended steps for good site preparation and compliance understanding.

## Feedstocks in Scope of the Soil Criteria

38 Do you agree that agricultural residues should comply with the soil criteria?

Strongly agree

If you agree that agricultural residues should comply with the soil criteria, please state why, providing evidence where appropriate:

To reinforce robust sustainability practices and prevent soil degradation.

If you disagree that agricultural residues should comply with the soil criteria, please state why, providing evidence where appropriate:

39 Should 'other crops' (where the whole plant is used as a bioenergy feedstock) have to comply with the soil criteria?

Yes

If you agree that 'other crops' should have to comply with the soil criteria, please provide evidence to support your response, including the benefits and challenges of applying the soil criteria to these feedstocks. :

"Other crops" would cover all annual, rotational crops – thus representing one of the largest feedstock potentials for biogas production (see NESO, 2025; Alder Bioinsights, 2025).

If you disagree that 'other crops' should have to comply with the soil criteria, please provide evidence to support your response, including the benefits and challenges of applying the soil criteria to these feedstocks. :

40 Should dedicated energy crops have to comply with the soil criteria?

Yes

If you agree that dedicated energy crops should have to comply with the soil criteria, please provide evidence to support your response, including the benefits and challenges of applying the soil criteria to dedicated energy crops. :

If bioenergy crops are included on the basis that they support, rather than compete with, other food crops in the rotation, there must be safeguards and evidence that these benefits are actually being delivered.

Meeting robust soil criteria is an effective way to manage this, as they can link eligibility directly to demonstrable improvements in soil quality and function. ISCC certification already includes several criteria focused on soil health, including the prevention of erosion, maintaining or improving soil organic matter and nutrient balance, and requiring documented soil management plans (see below for examples). As always, how these criteria are implemented, enforced and evidenced in practice should be a key focus for policymakers and scheme administrators.

If you disagree that dedicated energy crops should have to comply with the soil criteria, please state why, providing evidence where appropriate.:

## Compliance with the Soil Criteria

41 Should the types of evidence for demonstrating compliance with soil criteria be kept aligned with existing criteria?

Yes

If you think the types of evidence for demonstrating compliance with soil criteria should be kept aligned with existing criteria, please state why, providing evidence where appropriate.:

Keep evidence aligned with existing criteria.

If you think that the types of evidence for demonstrating compliance with soil criteria should not be kept aligned with existing criteria, please outline what changes should be made.:

42 Please highlight any specific cost implications to your business/sector in meeting the proposed soil criteria. Please provide evidence to support your response.

Please highlight any specific cost implications to your business/sector in meeting the proposed soil criteria. Please provide evidence to support your response. :

Soil criteria may add sampling and audit costs; guidance and defaults can minimize burdens, especially small operators.

## Policy Proposals: Forest Criteria

### Sustainable Forest Management Criteria

43 Do you agree that the requirements for setting the principles for sustainable land management are appropriate for the common framework?

Strongly agree

If you disagree that the requirements for setting the principles for sustainable land management are appropriate for the common framework, please outline how they could be changed.:

The proposed requirements for sustainable land management are appropriate for the common framework. They align with existing UK biomass sustainability schemes, providing consistency, continuity, and practical deliverability.

The approach is consistent with established certification frameworks, including the Sustainable Biomass Program, and builds on current risk-based mechanisms such as Regional Based Risk Assessment (RBRA), Timber Standards, UK Timber Regulations (UKTR), and due diligence. Aligning future updates with existing legislation will support familiarity, compliance, and smoother transitions, particularly as UKTR evolves to include timber origin requirements in line with global risk findings.

Guidance for Trees Outside Forests (TOF) should be clarified, with felling licences sufficient to demonstrate sustainable management where formal plans are absent. UK-sourced timber is legally felled by default and, when assessed under RBRA, can be considered sustainable. Felling licences, management plans, and voluntary certifications (FSC, PEFC, GiB) provide further assurance, though may not always be necessary for domestic material. RBRA may require updates to reflect ILO requirements.

Overall, the framework should remain anchored in UK Forestry Standard (UKFS) good practice, distinguishing clearly between Short Rotation Coppice (agricultural) and Short Rotation Forestry (forestry under UKFS).

### Biodiversity and Ecosystem Services Criteria

44 Do you agree that the common framework should continue to align with the biodiversity and ecosystem requirements set out in the Timber Standard?

Strongly agree

If you agree that the common framework should continue to align with the biodiversity and ecosystem requirements set out in the Timber Standard, please state why, providing evidence where appropriate.:

The Framework should remain aligned with the UK Timber Standard's biodiversity and ecosystem requirements, ensuring consistency with established sustainable forest management practices and existing certification schemes. This alignment provides industry certainty and supports practical deliverability.

A clear process for periodic review should be established, including how updates to external guidance — such as the UK Timber Procurement Policy and Timber Standard — are incorporated. While the current system functions and allows justified exceptions, it would benefit from review and updated guidance, particularly to support smaller suppliers in demonstrating best practice and strengthening due diligence.

The Framework should explicitly reflect the “no-go areas” under the Renewable Energy Directive (RED III). For UK supply, it should also reference compliance with the UK Forestry Standard and felling licence requirements.

If you disagree that the common framework should continue to align with the biodiversity and ecosystem requirements set out in the Timber Standard, please state why, providing evidence where appropriate.:

45 Are there any areas where government should go further than the existing requirements? How should these requirements be included?

Are there any areas where we should go further than the existing requirements? How should these requirements be included?:

No, the government should not go further than the existing requirements at this stage. The proposed approach already provides a high level of environmental protection and strong alignment with established forestry and sustainability standards.

Introducing additional requirements beyond those set out risks unnecessary complexity, with limited additional environmental benefit, and could undermine consistency and certainty for supply chains that are already operating to robust, independently certified standards.

### Social Criteria: Part 1

46 Do you agree that the common framework maintains the existing social requirements in current criteria?

Strongly agree

If you agree that the common framework maintains the existing social requirements in current criteria, please state why, providing evidence where appropriate.:

These requirements are well established, embedded within recognised certification and risk management systems, and go beyond what is required under similar international sustainability criteria (such as the EU's updated Renewable Energy Directive).

The current criteria have strong alignment with leading global standards and principles, such as the International Labour Organization, and so maintaining them will ensure high standards of legality and protection of economic, social, and cultural rights, while also providing consistency for industry.

If you disagree that the common framework maintains the existing social requirements in current criteria, please explain why, providing evidence where appropriate?:

### Social Criteria: Part 2

47 Should the common framework require forest managers to uphold the high-level principles running through the fundamental ILO Conventions?

Yes

If you think the common framework should require forest managers to uphold the high-level principles running through the fundamental ILO Conventions, please state why, providing evidence where appropriate.:

If you think the common framework should not require forest managers to uphold the high-level principles running through the fundamental ILO Conventions, please state why, providing evidence where appropriate.:

### Social Criteria: Part 3

48 Do you agree that forest managers should be required to ensure the management and harvesting activities have a positive impact on local communities in the sourcing area?

Somewhat agree

If you agree that forest managers should be required to ensure the management and harvesting activities have a positive impact on local communities in the sourcing area, please state why, providing evidence where appropriate:

With further consideration for how best to demonstrate or measure such community impact in the sourcing area.

If you agree that forest managers should be required to ensure the management and harvesting activities have a positive impact on local communities in the sourcing area, please state why, providing evidence where appropriate:

49 Are there any other social requirements that should be included in the common framework relating to the sourcing and harvesting of forest biomass? Please explain what these are, how these could be implemented, and the rationale for inclusion.

Are there any other social requirements that should be included in the common framework relating to the sourcing and harvesting of forest biomass? Please explain what these are, how these could be implemented, and the rationale for inclusion.:

Not necessarily beyond those already proposed in the common framework, besides perhaps transparent community engagement and SDG alignment. The existing social requirements are well established and, in several areas, already go beyond comparable requirements in other jurisdictions. Introducing further requirements risks unnecessary complexity and undermining consistency with established high-quality certification systems that are already delivering robust social outcomes across biomass supply chains.

## Forest Carbon Criteria: Part 1

50 Do you agree that requirements relating to productivity are sufficiently addressed in existing criteria?

Strongly agree

If you agree that requirements relating to productivity are sufficiently addressed in existing criteria, please state why, providing evidence where appropriate.:

These requirements are well established within recognised risk-based certification frameworks and are already effectively implemented across biomass supply chains.

If you disagree that requirements relating to productivity are sufficiently addressed in existing criteria, please state why, providing evidence where appropriate.:

## Forest Carbon Criteria: Part 2

51 Do you agree that the forest criteria should explicitly prevent forest derived biomass from being sourced from areas that would be permanently deforested?

Somewhat agree

If you agree that the forest criteria should explicitly prevent forest derived biomass from being sourced from areas that would be permanently deforested, please state why, providing evidence where appropriate.:

It is important to note that the biomass industry does not drive forest management or harvesting decisions. In the forestry sector, forestry products are allocated to uses based on quality, value and local economic needs. In wood fibre markets, not only is the price of sawlog wood considerably higher than the price of fibre used for wood pellets, but the pellet industry has also one of the lowest paying capacities. As a result, forest owners continue to manage land to maximise long-term value through the production of high-value timber productions, whilst the pellet production utilises forest residues and low-value material, thus not driving forest management or harvesting decisions.

The mechanism to demonstrate compliance should favour a process-based approach that determines compliance at the point of sourcing. This should require that all processes are followed at the time of sourcing, including recognition of the robust contractual provisions that already exist in the market and consideration for the market dynamics which drive forest management decisions. This should also include a clear, proportionate and structured response for non-compliance, based on best knowledge available at the time of sourcing. This approach is aligned with existing schemes such as the Renewables Obligation / Contract for Difference and REDIII which enable use of risk-based approach and focus on implementing management systems as accepted routes to demonstrating compliance. This approach is reflected in voluntary certification schemes such as SBP which is established in the biomass industry.

The incoming EU Deforestation and Degradation Regulation (EUDR) seeks to prevent products and commodities linked to deforestation and forest degradation from being placed onto the EU market. Whilst members such as Drax support the intention of the legislation, the new regulation places a significant compliance burden on operators who are required to collect geolocation requirements for all material back to the forest. This represents a significant challenge for the bioenergy industry and particularly for secondary/sawmill (processing) residues originating from the US South, where a large proportion of land is privately owned. The regulation further prohibits use of mass balance chain of custody systems and certification schemes as a route to demonstrating compliance. The complexity of the compliance burden (and cost) for operators has led to the regulation being postponed for two years.

We therefore back our members in urging the Government to adopt a proportionate and practical mechanism for demonstrating compliance with a focus on process-based requirements and use of risk-based approach, while ensuring the most sustainable outcome.

If you disagree that the forest criteria should explicitly prevent forest derived biomass from being sourced from areas that would be permanently deforested, please state why, providing evidence where appropriate.:

52 We propose that deforestation is defined as the conversion of a forest to non-forest land, in alignment with existing domestic definitions. Do you agree with this definition of deforestation?

Somewhat agree

If you disagree with the definition of deforestation given, please state why, and provide an alternative definition.:

Clarification on classifying deforestation in regard to clear-fell with restocking or natural regeneration is required. Recognize that there are multiple definitions of deforestation internationally.

### Forest Carbon Criteria: Part 3

53 Do you agree there should be an explicit requirement for long term forest carbon stocks to be maintained?

Strongly agree

If you agree that there should be an explicit requirement for long term forest carbon stocks to be maintained, please provide evidence to support your answer.:

There should be an explicit requirement for long-term forest carbon stocks to be maintained. As noted in the consultation, this principle has been a core requirement within established certification schemes and equivalent EU legislation for a number of years. It reflects the fundamental objective of ensuring that forest biomass sourcing does not result in a long-term decline in forest carbon stocks.

The appropriate timescale should be context-specific and take account of forest growth rates (which are impacted by climate, soil type, and species), typical forest harvest rotation length, and geographical scale. Forests with low productivity will require longer timescales than forests with high productivity to determine the stability of long-term carbon stock.

In addition, the assessment should be carried out at a landscape-scale or above to capture the varied distribution of forest ages at any given moment in time. If the assessment is carried out at a smaller scale there are likely to be significant, regular carbon stock fluctuations due to skewed distribution of tree ages in the assessment area, making assessment of stability more difficult (and requiring a longer timescale to confirm stability).

Industry should be using the most up-to-date techniques to monitor carbon stocks and trends using a pioneering science-based approach. This includes the use of remote sensing as well as national forest inventory data. For example, one of our members is developing a robust, peer reviewed forest carbon appraisal methodology for evaluating future risk to carbon stocks in sourcing regions. This involves modelling a range of plausible futures, including 'business as usual' and 'increases to' market biomass demand, to forecast a plausible range of forest carbon stocks trends. This provides a forest carbon 'early warning system' that can inform adaptive sustainable biomass sourcing strategy.

If you disagree that there should be an explicit requirement for long term forest carbon stocks to be maintained, please provide evidence to support your answer.:

What timescale should this assessment consider? Please provide evidence to support your response.:

We consider a 30-year assessment period to be appropriate and consistent with existing international standards, including the Sustainable Biomass Program. This timeframe is widely used in forest carbon accounting and international sustainability frameworks. It is sufficiently long to capture meaningful changes in forest carbon stocks, while remaining practical for monitoring, reporting and verification.

54 How could the assessment area be defined and determined? When should non-harvestable forests be included/excluded from the area assessment?

How could the assessment area be defined and determined? When should non-harvestable forests be included/excluded from the area assessment?:

Areas should be defined at a landscape scale or above to reflect the varied distribution of forest ages over time to avoid artificial carbon stock volatility. Assessments conducted at smaller spatial scales are more likely to show significant and regular fluctuations in carbon stocks due to skewed age-class distributions, making it harder to demonstrate stability and potentially requiring longer assessment timeframes.

Assessment boundaries could be determined using a number of context-appropriate approaches, including historical sourcing patterns for specific biomass processing facilities, a defined radius based on maximum transport distance or travel time, or a regional boundary where forest management and governance are well established. The approach used should remain flexible, transparent, and clearly justified for the specific supply context, including through supply-based evaluations.

Non-harvestable forests, such as protected areas, should be excluded from assessment areas where possible and practicable, particularly where their inclusion would distort carbon stock estimates or mask trends in managed forests. However, this is dependent on the availability of sufficiently detailed and reliable data to distinguish between harvestable and non-harvestable forest categories. Such data is not consistently available across all geographies, and where exclusions cannot be robustly evidenced, this should be clearly documented within the assessment.

55 What additional guidance should there be regarding a short-term reduction in carbon stocks? This should include what reasons are acceptable for short-term reductions in forest carbon stocks, what evidence should be provided to demonstrate steps are being taken to restore forest carbon stocks and how often assessments should be revisited.

What additional guidance should there be regarding a short-term reduction in carbon stocks? This should include what reasons are acceptable for short-term reductions in forest carbon stocks, what evidence should be provided to demonstrate steps are being taken to restore forest carbon stocks and how often assessments should be revisited.:

Guidance should list acceptable short-term reductions (natural disturbances, invasive species control, disease control, age-class transitions) and require plans for recovery with re-assessment intervals.

- Short-term reductions in forest carbon stocks can occur even when long-term carbon stocks are stable. This can be caused by shocks from historical

natural disturbance (wildfire, wind damage, pests & disease), leading to sudden loss of carbon stocks, and skewing the tree's age across the forest. In addition, historical planting patterns, and major market disruptions (e.g., a housing crash leading to delayed harvesting) can also lead to skewed tree age across the forest, even at the landscape scale.

- Evidence of these disturbance events, along with evidence of ongoing sustainable forest management in the assessment area, should be provided to demonstrate steps that are being taken to restore forest carbon stocks.

- Evidence for the short-term reduction of acceptability could be submitted/demonstrated once – since it is caused by historical events. Ongoing evidence of sustainable management practices should be provided, along with forest carbon stocks monitoring to demonstrate steps continue to be taken to restore carbon stocks.

- This assessment could be repeated at the same frequency as areas where carbon stocks are not experiencing a short-term reduction.

## Forest Carbon Criteria: Part 4

56 Should government set requirements relating to management changes? How could these be monitored and what should these requirements cover? Please provide evidence, rationale and risks of this approach.

Should government set requirements relating to management changes? How could these be monitored and what should these requirements cover? Please provide evidence, rationale and risks of this approach.:

Management-change requirements risk disproportionate burdens; monitor through indicators (mean diameter/rotation length) before mandating. Government should not set requirements relating to management changes. There can be wide variation in practices within sustainable forest management applied to different types of forests. Sustainable forest management is well documented.

To ensure forest productivity, resilience, and economic viability, forest managers must be able to implement adaptive forest management in response to ecosystem and market conditions without a new set of requirements. Sustainable forest management already encompasses a wide range of practices adapted to different forest types, ownership structures, and local conditions. Forest managers must retain the ability to apply adaptive management in response to ecological conditions, disturbance, and market dynamics.

Furthermore, large-scale monitoring and evidence of changes to forest management practices is problematic due to data availability.

57 What data could government collect from sourcing regions to monitor management changes? How can government understand the extent to which bioenergy demand may be influencing management changes?

What data could government collect from sourcing regions to monitor management changes? How can government understand the extent to which bioenergy demand may be influencing management changes?:

Government could monitor forest management changes by collecting and collating data on harvest intensities, age-class distributions, restocking and regeneration rates, disturbance events (such as fire, pests, and storms), and the extent of certification coverage across sourcing regions. For domestically sourced material, much of this data is already collected by the devolved Forestry Commissions, whose monitoring frameworks are well-established, respected, and sufficient for understanding management trends.

Changes in the average age of forests may provide a useful proxy indicator of management of change over time. However, this metric is not definitive, as forest age profiles can also be affected by natural disturbances and legacy management practices, and data availability and consistency vary across regions.

To understand the extent to which bioenergy demand may be influencing management decisions, the Government can also monitor local forest product markets. A sustained price differential between low-value roundwood or forest residues and higher-value sawlogs would indicate that bioenergy is unlikely to be driving changes in forest management, as higher-value material continues to be directed to material uses. This quantitative analysis can be complemented by qualitative expert assessments of local forest management practices to assess counterfactual outcomes for low value roundwood and residues, and to evaluate whether bioenergy demand is materially influencing those outcomes.

As highlighted in recent work by Keith Kline and Virginia Dale, the selection of an appropriate counterfactual (or reference scenario) is central to assessing the sustainability impacts of bioenergy systems. Government monitoring should therefore explicitly define and test against realistic alternative land-use scenarios when evaluating management changes. See for example Kline et al., *Reconciling bioenergy and biodiversity conservation: integrated assessment and policy approaches* (ScienceDirect), and Dale et al., *Land use and bioenergy sustainability: a review of science and policy considerations* (Wiley Online Library), which emphasise the importance of reference scenarios in interpreting observed land-management outcomes.

## Prohibited Land Categories

58 Do you agree that forest biomass should not be sourced from the prohibited land categories proposed?

Somewhat agree

If you agree that forest biomass should not be sourced from the prohibited land categories proposed, please state why, providing evidence where appropriate:

Forest biomass should not be sourced from the prohibited land categories proposed. These categories are consistent with existing international best practice and should be implemented within the same risk-based framework that applies to the wider forest criteria.

This approach is also aligned with the sustainability requirements established under the UK's low-carbon dispatchable Contracts for Difference (CfD). Under these arrangements, generators are not permitted to source forest residues (i.e. material that comes directly from the forest) from primary forests or old-growth material, with no exclusions. This prohibition does not apply to secondary residues (e.g. sawmill residues).

The framework should therefore establish a standardised approach across the biomass sector and maintain alignment with the criteria set out for low-carbon dispatchable CfDs.

It is also important to recognise that there is no single, universal definition of old growth forest. Definitions vary across jurisdictions to reflect local ecological conditions and forest management practices. Local governments and relevant authorities are best placed to determine what constitutes old growth within their context. Accordingly, any definition should allow for locally robust and appropriate classifications, underpinned by a clear minimum set of standards rather than a single universal definition.

If you disagree that forest biomass should not be sourced from the prohibited land categories proposed, please state why, providing evidence where appropriate:

59 Should material be allowed to be sourced from primary, old growth and highly biodiverse forest if it can be demonstrated that the area has been harvested to prevent disease, fire or pests, or that the production of the raw material did not interfere with nature protection purposes?

Yes

If you think material should be allowed to be sourced from primary, old growth and highly biodiverse forest if it can be demonstrated that the area has been harvested to prevent disease, fire or pests, or that the production of the raw material did not interfere with nature protection purposes, what evidence should be required to demonstrate compliance?:

As a general principle, material should not be sourced from primary, old-growth or highly biodiverse forests. This aligns with the sustainability requirements under the UK's low-carbon dispatchable Contracts for Difference (CfD), which prohibit sourcing forest residues (i.e. material sourced directly from the forest) from primary forests or old-growth material, without exception. This does not apply to secondary residues (e.g. sawmill residues). The framework should remain aligned with these criteria to ensure a consistent approach across the biomass sector.

If any exceptions are considered, for example to address disease, fire or pest outbreaks, they should apply only in genuinely exceptional and tightly defined circumstances. A very high evidential threshold should be required, including independent verification, approval by the relevant competent authority, and clear documentation demonstrating that the intervention is strictly necessary, limited in scale, and focused on protecting or restoring forest health.

Sourcing on the basis that production "did not interfere with nature protection purposes" should not be permitted, as this is subjective and risks weakening sustainability safeguards. Overall, any exception must be demonstrably necessary, proportionate and transparently verified.

## Roots Criterion

60 Do you agree that roots should be an ineligible feedstock?

Strongly agree

If you agree that roots should be an ineligible feedstock, please provide evidence to support your response.:

Roots should be an ineligible feedstock. Excluding roots is consistent with existing sustainability requirements and good forest management practice and should be implemented within the same risk-based framework that applies to the wider forest criteria.

If you disagree that roots should be an ineligible feedstock, please provide evidence to support your response.:

61 Should the sustainability criteria allow for certain circumstances where roots can be used for bioenergy?

No

If you think the sustainability criteria should allow for certain circumstances where roots can be used for bioenergy, please state what circumstances these might be and how they can be evidenced.:

The sustainability criteria should not permit the use of roots for bioenergy unless there is clear, case-specific, and independently verified evidence from the relevant Plant Health or Forestry Commission authority confirming that removal is necessary, limited, and environmentally sustainable.

Root systems are fundamental to soil structure, carbon storage, and long-term site productivity, and their extraction should be exceptional, not routine.

Any exception should apply only where roots have already been removed for legitimate reasons (e.g. authorised infrastructure clearance or whole-tree uplift following replanting or windthrow) and must be supported by robust evidence that soil health, carbon stocks, and biodiversity will not be adversely affected, and that no incentive is created for deliberate root extraction.

## Cascading Use Principal: Part 1

62 Do you agree with the proposed specification of sawlogs?

Somewhat agree

If you do not agree with the proposed specification of sawlogs, how do you think they should be defined?:

While we support the definitions, it is important to recognise that these definitions were developed for classification and data purposes and may be less well suited when applied as the basis for hard regulatory restrictions.

In particular, definitions that rely on specifications used by the sawmill closest to where the wood was grown can become problematic if a high degree of precision is required. In practice, sawmills within the same locality often apply a wide range of technical specifications, which could lead to ambiguity or arbitrary outcomes, including questions over why one specification was applied rather than another. Similarly, specifications issued by bodies exercising functions of a public nature, such as forestry handbooks or field guides, are typically intended as guidance rather than prescriptive rules. While widely used and valuable, these documents allow for considerable regional and operational variation and are not applied as strict 'pass-fail criteria' at the point of sale or delivery.

In practice, wood fibre markets already determine whether material is a sawlog through economic signals. Material suitable for sawmilling commands a higher value and is directed to sawmills (see answers to questions 56-58). Where material is delivered to a pellet mill, it is because it does not meet the technical, economic, or logistical requirements for sawmilling. It is important that the use of sawlog definitions within the framework does not override these market dynamics or introduce arbitrary distinctions that undermine how supply chains function in practice.

63 Should sawlogs be prevented from use in bioenergy?

Yes

Should sawlogs be prevented from use in bioenergy? Please provide evidence to support your response.:

Support preventing the use of sawlogs for bioenergy where the forest criteria apply.

This is already reflected in the sourcing practices of our members.

In practice, our members do not use sawlogs. Market dynamics ensure that wood suitable for sawmilling is directed to material uses, as it commands a significantly higher price than material used for bioenergy. Pellet producers therefore rely on feedstocks that do not meet the technical, economic, or logistical requirements of sawmilling.

It is important that any restriction on the use of sawlogs is implemented in a proportionate and risk-based manner. Where markets are functioning well and there is no evidence of distortion or competition with material uses, heavy-handed or blanket requirements would add administrative burden without improving sustainability outcomes. The framework should therefore focus on addressing clearly identified risks rather than second-guessing market allocation.

We also note that this principle is already embedded within established certification systems used by the sector. For example, the Sustainable Biomass Program includes a specific requirement to avoid competition with sourcing for long-lived wood products<sup>4</sup>. Aligning the common framework with such existing approaches would ensure consistency, avoid duplication, and support effective implementation.

64 If sawlogs are prevented from use in bioenergy, should a small margin of tolerance be introduced?

Yes

If you think a small margin of tolerance for the use of sawlogs in bioenergy should be introduced, please provide evidence to support your response:

A limited margin of tolerance would be necessary. In practice, forest harvesting, sorting, and transport are not perfectly precise processes. Harvest operations produce mixed qualities from the same stand, specifications can vary by sawmill and region as well as over time. Further, determinations are often made at the point of harvest based on market, logistical, and processing constraints. As a result, a de minimis presence of material that could technically meet a sawlog specification may occur despite best practice sourcing and without any intent to divert higher-value material to bioenergy.

A small margin of tolerance is therefore essential to ensure the framework is enforceable and proportionate. Without such a margin, the requirement would risk becoming unworkable in practice, leading to excessive administrative burden without delivering meaningful sustainability benefits. Any margin of tolerance should be clearly defined and limited, applied within a risk-based framework and aligned with existing certification and audit practices.

If you think a small margin of tolerance for the use of sawlogs in bioenergy should not be introduced, please provide evidence to support your response:

## Cascading Use Principal: Part 2

65 Beyond the included sawlog proposal, how could the cascading use principle be implemented in the common framework? Please provide details of the administrative burden across the supply chain and how this could be reduced.

Beyond the included sawlog proposal, how could the cascading use principle be implemented in the common framework? Please provide details of the administrative burden across the supply chain and how this could be reduced.:

Beyond the proposed sawlog safeguard, the cascading use principle should be implemented in the common framework through risk-based due diligence and transparency requirements, rather than prescriptive or consignment-level restrictions. This approach would uphold the principle while avoiding unnecessary administrative burden and unintended market distortion. Well-functioning markets that are already cascading effectively should not be burdened with unnecessary administrative requirements. Any intervention should be targeted only at clearly evidenced risks, rather than applied as a blanket rule across diverse supply chains.

REA members already promote cascading use and adhere to the waste hierarchy through established reuse and recycling pathways, supported by functioning market signals. The market additionally utilises the cascading principle to an extent, therefore it is pertinent to consider how we decide which is a better use and factor in local demand. For post-consumer and Category C waste wood, cascading is already inherently applied through the waste hierarchy, with material suitable for reuse or recycling diverted upstream and only residual, lower-grade fractions recovered for energy. Additional prescriptive controls at the point of energy recovery would add administrative burden without materially improving environmental outcomes, particularly where recycling markets are already operating at capacity.

In practice, wood fibre markets already cascade material according to quality and value. Higher-grade material is consistently directed to material uses, with lower-grade residues and waste supplied to energy recovery. For example, the UK generates around 4.5 million tonnes of waste wood annually, of which approximately 1.5 million tonnes is recycled or reused, primarily in panelboard and animal bedding markets that are operating at or near capacity. Around 3 million tonnes of lower-grade material is recovered as biomass fuel. Historic evidence shows that, prior to the development of compliant biomass markets, much of this material was landfilled, exported or unmanaged, demonstrating that energy recovery plays a critical role at the bottom of the cascade.

While limited additional recycling of clean waste wood could be achieved through improved segregation, even a substantial increase would represent only a small fraction of the volumes currently managed through energy recovery. The most effective lever to improve cascading outcomes would be higher wood packaging recycling rates, rather than additional regulatory burdens on downstream users. Small-scale uses of clean waste wood for heat exist but are marginal in volume and could be addressed separately if policy objectives change.

In the forestry sector, cascading use is already embedded through economic signals, with sawlogs commanding significantly higher prices than fibre used for bioenergy. Evidence from EU and UK assessments, including the European Commission's review of UK biomass support, demonstrates that bioenergy has not distorted competition with material uses. Attempting to move beyond market-based allocation raises practical challenges, as the relative value and environmental benefit of different uses varies by geography, time and technology. For example, the role of BECCS within a cascading hierarchy is not yet well defined and requires further lifecycle assessment.

A rigid, one-size-fits-all approach risks negative unintended consequences, particularly in regions where declining demand from traditional industries has left surplus low-grade fibre. In such cases, bioenergy markets can support continued forest management and help prevent land-use change.

Overall, the cascading principle is best delivered through proportionate, evidence-based safeguards, supported by market transparency and lifecycle assessment, rather than through prescriptive controls that would increase administrative burden across the supply chain without delivering additional environmental benefit. Furthermore, it must be ascertained what period of time should be taken into account, as well as how to react when a new need emerges in the market. The question of implementation and burden of proof is thus important, and understanding how it aligns with REDIII, SVP, and subsidy schemes should be clarified.

66 Should the cascading use principle only apply to forest derived biomass, or all woody biomass?

Forest derived biomass

Please provide evidence to support your response on whether the cascading use principle should only apply to forest derived biomass, or all woody biomass.:

100% 'Sustainable Source'

67 Do you agree that, under the common framework, government should only provide support (where the forest criteria apply) to bioenergy from feedstocks that meet the forest criteria?

Strongly agree

If you agree that, under the common framework, government should only provide support (where the forest criteria apply) to bioenergy from feedstocks that meet the forest criteria, please state why, providing evidence where appropriate:

Government support should apply only to bioenergy feedstocks that meet the forest criteria, where those criteria apply. This promotes best practice across the sector and ensures that only sustainably sourced biomass is supported.

The progression from a 70% sustainably sourced requirement to 100% compliance is supported, consistent with the strengthened requirements under the low-carbon dispatchable CfD. However, it is important that "100% sustainable" is not interpreted as requiring 100% certified material. Domestic supplies using FSC 70% certified and FSC 30% controlled material should be recognised as meeting the 100% sustainable threshold, provided robust evidence is available through recognised assurance schemes. Moving away from this approach would risk undermining well-managed and well-regulated domestic forestry practices.

Prohibited land categories, specifically the primary and old growth forest criterion, should not apply to secondary feedstocks such as sawmill residues.

For clarity, operations using other approved fuels, including waste wood or sawmill residues, should continue to receive support where they meet the

relevant policy requirements.

If you disagree that, under the common framework, government should only provide support (where the forest criteria apply) to bioenergy from feedstocks that meet the forest criteria, please state why, providing evidence where appropriate:

68 Considering the forest criteria in the round, are there any other criteria that should be included to ensure forest biomass is low carbon?

Considering the forest criteria in the round, are there any other criteria that should be included to ensure forest biomass is low carbon?:

No, additional forest criteria not necessary to ensure forest biomass is low carbon. Taken together, the proposed forest criteria are comprehensive and appropriate. The framework should prioritise consistency and stability and will bring UK requirements into alignment with the standards applied in the EU.

### Feedstocks in Scope of Forest Criteria

69 Do you agree with the feedstocks that are in scope?

Somewhat disagree

If you agree with the feedstocks that are in scope, please state why, providing evidence where appropriate.:

If you disagree with the feedstocks that are in scope, please explain which feedstocks should be in or out of scope of the forest criteria. Please provide evidence to support your response. :

Agree that sawmill residues are appropriate for inclusion within the scope of the framework.

However, there is concern that the current approach does not sufficiently distinguish between sawmill residues and residues arising further downstream in wood processing supply chains. In practice, this could result in the inclusion of wood fibre, sourced via aggregators, brokers or hauliers, including material from furniture manufacturing, construction products, or other secondary processing activities.

In the U.S. pellet market, sawmill residues are typically sourced directly from identifiable primary processing facilities. By contrast, downstream wood residues sourced through multi-step supply chains are often pooled and traded through intermediaries, making it difficult to link material back to forest-level practices in a meaningful or proportionate way.

These feedstocks are far removed from forest management and harvesting decisions and present an extremely low sustainability risk, even relative to sawmill residues. Applying forest criteria uniformly across these distinct material streams would increase administrative burden and may risk the disqualification of well-established, low-risk feedstocks without delivering meaningful environmental benefit.

As such the Government should consider exempting secondary feedstocks from the forest criteria.

70 What are the challenges with applying the forest carbon stocks criterion to secondary feedstocks (e.g. sawmill residues)? How could these be overcome?

What are the challenges with applying the forest carbon stocks criterion to secondary feedstocks (e.g. sawmill residues)? How could these be overcome?:

For traditional secondary feedstocks, such as sawmill residues, the application of the forest carbon stocks criterion is achievable and appropriate. These materials are sourced from identifiable primary processing facilities and are already covered by existing certification processes used by wood pellet producers.

However, challenges arise for downstream wood residues sourced through multi-step supply chains, such as material arising from furniture manufacturing, construction products, or similar processing activities, may be aggregated and traded via brokers or hauliers. Applying forest carbon stock criteria uniformly across these different material streams risks disproportionate requirements where there is no meaningful link to forest-level carbon outcomes.

71 Are there challenges with applying the prohibited land categories to secondary feedstocks (such as sawmill residues)?

Yes

If there are challenges with applying the prohibited land categories to secondary feedstocks (such as sawmill residues), please identify challenges and suggest how these could be overcome (e.g. through the use of appropriate proxies).:

For sawmill residues, we do not see material challenges in applying prohibited land category requirements, as these feedstocks are widely recognised as low risk and are already addressed through existing sustainability and due diligence systems.

Similar to forest carbon stocks, difficulties arise where the framework applies prohibited land category requirements to further downstream wood residues sourced through multi-step supply chains. In these cases, linking material back to forest-level land use in a meaningful and proportionate way can be highly challenging.

It is important to note that the biomass industry does not drive forest management or harvesting decisions. Forestry products are allocated based on quality, value, and local economic needs. Secondary residues provide a market for low-value material that would otherwise likely be burned, supporting

climate outcomes and the wider forest sector without incentivising unsustainable harvesting. UK government guidance, including the 2023 Biomass Strategy, recognises the value of secondary residues in supporting sustainable forestry operations and local economies.

Applying strict prohibitions on primary or old-growth material for secondary residues could have unintended consequences, such as increased use of direct forest residues (e.g., thinnings or low-grade roundwood) or the disposal of secondary residues through burning.

There is also a risk of misalignment with existing UK and EU frameworks. In the UK, sustainable forest management and land criteria are applied to all wood fuel, including secondary residues, using a risk-based approach. REDIII similarly exempts most biofuels from waste and residues from strict land criteria, recognising the sustainability and commercial value of secondary residues. Third-party certification schemes such as SBP, benchmarked against REDIII, treat secondary residues as generally low risk and do not require proof that the original feedstock avoided primary or old-growth forests.

Introducing absolute “no-go zones” for secondary residues would shift from a risk-based to an absolute approach, creating divergence from REDIII and SBP and potentially making SBP compliance insufficient to demonstrate adherence to LC CfD requirements. It is therefore vital that an auditable management system remains in place to allow biomass producers to evidence compliance while maintaining alignment with good forest management and existing sustainability standards.

72 Do you have any additional views on secondary feedstocks (such as sawmill residues) that have not been captured by questions above? For example, the risks associated with misalignment with other international sustainability criteria (e.g. EU RED III).

Do you have any additional views on secondary feedstocks (such as sawmill residues) that have not been captured by questions above? For example, the risks associated with misalignment with other international sustainability criteria (e.g. EU RED III):

We have concerns about potential misalignment between the treatment of secondary feedstocks under the common framework and approaches taken in other jurisdictions, particularly the EU under RED III (which requires only the greenhouse gas saving criteria for secondary biomass).

Secondary feedstocks are widely recognised internationally as low-risk and among the most desirable inputs for bioenergy. Divergence in how these materials are treated across jurisdictions risks fragmenting international biomass markets. In practice, one consignment of pellets could meet sustainability requirements in one jurisdiction but not another – damaging fungibility of products.

This fragmentation would deliver little or no additional environmental benefit, given the low-risk nature of these feedstocks, but would reduce the efficiency and resilience of biomass supply chains. Reduced liquidity limits the ability of markets to respond to supply and demand increasing exposure to volatility, particularly in a sector reliant on long-distance trade and long-term contracting.

Further, divergence also risks fragmenting certification systems, as schemes are forced to develop jurisdiction-specific interpretations and audit pathways. This can disproportionately disadvantage smaller suppliers, reduce competition, and increase the risk that otherwise sustainable material is excluded on technical or procedural grounds rather than environmental performance.

For these reasons, close alignment with international frameworks such as RED III is important to ensure that sustainability rules support, rather than constrain, well-functioning markets, while maintaining strong environmental outcomes.

73 Should Short Rotation Forestry (SRF) have to comply with the productivity criterion, forest carbon criterion or deforestation criterion?

Yes

If Short Rotation Forestry (SRF) should have to comply with the productivity criterion, forest carbon criterion or deforestation criterion, please state why, providing evidence where appropriate.:

SRF should have to comply with the productivity criterion and deforestation criterion regardless of the trees' age upon harvest. Furthermore, a forest carbon criterion exemption by circumstance should be considered.

If Short Rotation Forestry (SRF) should not have to comply with the productivity criterion, forest carbon criterion or deforestation criterion, what should the cut off age of the trees harvested be for the exemption? Please provide evidence to support your response. :

## Evidence of Compliance With the Forest Criteria

74 Should the types of evidence for demonstrating compliance with forest criteria be kept aligned with existing criteria?

Yes

If the types of evidence for demonstrating compliance with forest criteria should be kept aligned with existing criteria, please state why, providing evidence where appropriate.:

The types of evidence used to demonstrate compliance with the forest criteria should remain aligned with existing criteria. In particular, biomass users should be able to demonstrate compliance with the forest criteria with evidence either provided by a recognised and benchmarked voluntary scheme or through bespoke evidence.

If the types of evidence for demonstrating compliance with forest criteria should not be kept aligned with existing criteria, please outline what changes should be made.:

75 Please highlight any specific cost implications to your business/sector in meeting the proposed forest criteria. Please provide evidence to support your answer.

Please highlight any specific cost implications to your business/sector in meeting the proposed forest criteria. Please provide evidence to support your answer. :

Some cost implications include those associated with proportional audits, data collection, and certifications. If following existing UK practice, costs are expected to be manageable.

76 What challenges (including costs) are faced by certification schemes updating their criteria to be compatible with the forest criteria proposals that go beyond existing requirements? Please highlight any challenges that may vary depending on biomass end use sector or application e.g. transport vs electricity.

What challenges are faced by certification schemes updating their criteria to be compatible with the forest criteria proposals that go beyond existing requirements? Please highlight any challenges that may vary depending on biomass end use sector or application e.g. transport vs electricity. :

Challenges from certification scheme updates include re-benchmarking cost and procedural implications, as well as potential deviation from EU regulations and UK practice.

Introducing new requirements not covered by existing certification schemes creates a 'compliance gap' and means either the scheme has to adapt to cover the new requirements or the operator has to evidence compliance via an alternative MRV method ultimately increasing costs and reducing fungibility of product between international markets. Many international sustainability schemes are based on a multi-stakeholder model, meaning any changes have to be consulted on publicly for a minimum amount of time, this together with the introduction of new requirements could trigger the need for a new benchmarking process by the regulator, adding complexity and cost into the supply chain.

## Wastes and Residues

77 Do you agree that, unless otherwise stated, wastes and residues should be exempt from the land criteria?

Somewhat agree

If you agree that, unless otherwise stated, wastes and residues should be exempt from the land criteria, please state why, providing evidence where appropriate.:

Wastes and residues should be exempt from land criteria unless otherwise stated. This is consistent with RED II/III, which recognises that such materials do not drive additional land use or land-use change, unlike purpose-grown feedstocks. Existing regulatory practice (e.g. Ofgem) already reflects this distinction while maintaining appropriate sustainability safeguards.

However, practical implementation must align with this principle. While the framework appropriately prioritises wastes and residues, environmental permitting does not always facilitate their use. In particular, recovered virgin wood that meets recognised quality and contamination standards can be treated more restrictively than virgin biomass under standard combustion permits, requiring permit variations despite equivalent fuel performance.

This creates a structural bias in favour of virgin material, contrary to the waste hierarchy. We recommend that the framework, or accompanying guidance, promotes clearer alignment between sustainability policy and permitting practice, enabling the use of clearly defined, quality-assured recovered wood fuels without unnecessary additional regulatory processes, while maintaining robust environmental controls.

If you disagree that, unless otherwise stated, wastes and residues should be exempt from the land criteria, please state why, providing evidence where appropriate.:

78 Do you have evidence that wastes are being purposefully created to produce feedstocks for bioenergy?

No

If you have evidence that wastes are being purposefully created to produce feedstocks for bioenergy, please provide evidence.:

To the best of our knowledge there is no evidence exists that wood wastes are being purposefully created to produce feedstocks for bioenergy. Grade C waste wood is a by-product of arises from other activities such as construction and demolition and is so low quality due to being contaminated with paints, and resins and/or preservatives. It can only be used for energy recovery or it will end up in landfills. This demonstrates that these wastes are genuine residual materials.

A variety of biodegradable waste types (e.g. manures, slurries, used animal bedding, food waste and, in the case of dry-AD, plant wastes from municipal sources such as local authority parks and household garden wastes) are fed into AD. The types fed in vary geographically (for a variety of reasons), by AD process type (e.g. 'wet' or 'dry') and whether the facility is approved for treating animal by-products (most food waste source types count as animal by-products.) These biodegradable wastes are valuable renewable resources from which biomethane, marketable CO2 products and digestates are produced using AD processes.

Similarly, there is no evidence that organic wastes used in anaerobic digestion within the UK are being deliberately created in order to access bioenergy support mechanisms. The principal AD feedstocks — including food waste, agricultural manures and slurries, crop residues, and unavoidable processing wastes — arise as unavoidable by-products of food production, agriculture, and municipal waste management systems.

Anaerobic digestion provides a controlled treatment route for these materials consistent with the waste hierarchy, delivering methane capture, renewable gas production, and nutrient recycling through digestate return to land. In many cases, AD represents the highest-value recovery option available once prevention, redistribution, or animal feed uses have been exhausted.

We support incentives for reducing waste. In line with the polluter pays principle, those producing waste must pay for its management. This creates a financial driver to reduce waste arising.

Not all waste streams are sustainable. There is some evidence that global supply chains have incentivised unsustainable waste streams and unintended consequences.

## Novel Feedstocks

79 Are there any emerging or novel biomass feedstocks for which sustainability criteria may need to be developed?

Yes

If there are emerging or novel biomass feedstocks for which sustainability criteria may need to be developed, please specify the feedstocks and suggest criteria that would mitigate potential environmental harms arising from the sourcing of the feedstock.:

Potentially algae and seaweed, where the applicable assessment is undergone first before relevant sustainability criteria is to be developed.

## Application of Land Criteria to non-Bioenergy Uses

80 How would the land criteria, as currently formulated, be applied to biomass feedstocks regardless of their end use (including non-energy uses)?

How would the land criteria, as currently formulated, be applied to biomass feedstocks regardless of their end use (including non-energy uses)?:

The framework's land criteria should be set independently from the biomass' end use. For each consignment of biomass, the framework should determine its sustainability – which encompasses all GHG emission and land criteria. Subsequent sector-specific markets and policy mechanisms can determine demand for different biomass types, if necessary.

81 Would the land criteria need be adapted to mitigate potential negative environmental impacts associated with non-energy uses of biomass?

Yes

If you think that the land criteria would need to be adapted to mitigate potential negative environmental impacts associated with non-energy uses of biomass, please provide evidence to support your response.:

Any biomass feedstock which is coming directly from land (forestry, agricultural field residues, dedicated energy crops) should require alignment with the land criteria proposed within the Framework. Article 29 of RED III, explicitly states that while industrial wastes might be exempt, agricultural residues (including energy crops) and forestry biomass are strictly subject to land-use criteria. This includes evidence that the raw material was not obtained from land with high biodiversity value (primary forests, highly biodiverse grasslands) or high carbon stock (wetlands, peatlands). We support that the Framework has proposed the land criteria is not required for residues/by-products, with the exception of agricultural field residues where land criteria should be a requirement to avoid depleting agricultural soils of carbon and other nutrients.

If you think that the land criteria would not need to be adapted to mitigate potential negative environmental impacts associated with non-energy uses of biomass, please provide evidence to support your response.:

82 If applied to non-energy uses, how could government ensure that the application of land criteria does not create unintended barriers for sustainable non-energy uses of biomass?

If applied to non-energy uses, how could we ensure that the application of land criteria does not create unintended barriers for sustainable non-energy uses of biomass? :

The non-energy use sectors will need to develop suitable MRV frameworks the same way the bioenergy sector has done. To not request these other potential end use markets to adhere to the same sustainability framework standards risk undermining what the CBSF is aiming to achieve.

As set out in response to earlier questions, REA encourages Government to consider a legislative route to implementing the Common Framework and the application of the Framework to non-subsidised biomass use. This could extend to non-bioenergy applications to support improved circularity across the economy.

## Application of (non-GHG) Environmental Protections to Wider Biomass Supply Chain

83 What environmental or social concerns are there regarding the wider biomass supply chain? Please be specific about their nature and the sectors that these concerns relate to.

What environmental or social concerns are there regarding the wider biomass supply chain? Please be specific about their nature and the sectors that these concerns relate to.:

See Q30 & Q46.

84 Should sector specific policy measures be put in place to mitigate potential risks relating to the wider supply chain or should these be set out at a cross-sector level under the common framework?

Specific policy measures be put in place

If sector specific policy measures should be put in place to mitigate potential risks relating to the wider supply chain or should these be set out at a cross-sector level under the common framework, please provide detailed evidence on what these could be and how they could be implemented, noting the challenges highlighted above.:

The REA considers that while a cross-sector Common Biomass Sustainability Framework is essential for ensuring consistency, clarity and proportionality, it must be flexible enough to recognise sector-specific supply chains. Certain biomass-using sectors—such as horticulture, soil improver manufacturing, and mulch production—depend on unique feedstocks, including forestry and sawmill co-products and waste-derived composts. These carry different risk profiles from, for example, feedstocks used for bioenergy or long-distance traded biomass.

A purely cross-sector approach risks creating a framework that does not properly account for the low-risk, circular-economy characteristics of these feedstocks. Therefore, the CBSF should set the overarching principles and minimum sustainability expectations, while sector-specific measures should be used where needed to reflect real-world operational and supply-chain characteristics.

Evidence supporting the need for sector-specific considerations

- Forestry and sawmill co-products (not wastes) are essential feedstocks for mulch, soil improvers and growing media used in both professional and amateur horticulture.
- 'Composted green waste' (CGW) and composted food and garden waste are independently certified to UK End-of-Waste criteria, demonstrating strict quality, safety and environmental controls.
- These products are already heavily regulated through quality protocols and certification schemes, and introducing duplicative cross-sector requirements could create unnecessary administrative burden without improving sustainability.

Market data illustrating scale and importance

Defra's 2023 statistics show the significant contribution of these co-products and composted materials to UK horticulture:

- 365,792 m<sup>3</sup> of bark
- 1,055,510 m<sup>3</sup> of wood fibre
- 208,335 m<sup>3</sup> of composted green waste (CGW)

These feedstocks support the UK's transition away from peat, contribute to soil health, and underpin circular-economy practices by valorising materials that would otherwise be wasted.

How the Common Biomass Sustainability Framework should be designed

To support continued use of forestry/sawmill co-products and certified waste-derived composts, the CBSF should:

Recognise existing certification (End of Waste, PAS100, etc.) as evidence of compliance.

Avoid imposing cross-sector obligations that duplicate current quality and assurance schemes.

Apply a risk-based approach, where low-risk, short-supply-chain feedstocks are subject to proportionate requirements.

Provide clear exemptions or tailored pathways for composts and co-products already proven to be sustainable and circular.

Implementation challenges and how to address them

Challenges:

- Risk of one-size-fits-all rules imposing unnecessary burdens on low-risk materials.
- Potential disruption of supply chains that support peat-free horticulture.
- Lack of sector engagement may lead to unintended consequences.

Mitigation:

- Early consultation with companies using co-products for mulch, soil improvers and growing media.
- Explicit recognition of End-of-Waste criteria within the CBSF.
- Clear guidance differentiating low-risk short-chain feedstocks from higher-risk categories.

## Chapter 4: Greenhouse Gas (GHG) Criteria

### Common Parameters for Calculating GHG Lifecycle Emissions

85 Do you agree that the proposed lifecycle parameters can be used to give an appropriate representation of the bioenergy LCA emissions?

Strongly agree

If you agree that the proposed lifecycle parameters can be used to give an appropriate representation of the bioenergy LCA emissions, please state why, providing evidence where appropriate.:

The proposed parameters are all essential for a comprehensive LCA. It is critical that the framework is sufficiently flexible to enable projects to decarbonise and optimise processes within each of these parameters – so long as novel approaches and methodologies are appropriately supported by academic, robust evidence.

We support the inclusion of Carbon Capture and Replacement (CCR) credits within the sustainability framework; however, clearer and more robust criteria are needed to govern their use. CCR credits can have a substantial impact on a fuel's overall carbon intensity (CI) — often outweighing all other emissions sources and resulting in negative CI scores. While this can provide economic advantages through the sale of Energy Attribute Certificates (EACs), it also introduces a risk of market distortion and potential misrepresentation of actual environmental performance.

For example, manure-based CCR credits currently apply significant negative bonuses to CI calculations. This reduces the volume of renewable fuel required to meet CI targets under fuel obligations. However, this approach may overstate the environmental benefit since manure is increasingly used commercially, and the assumption that it would otherwise be left to emit methane may no longer be valid. In some cases, inflated gate values for manure could even incentivize more intensive livestock operations or herd expansion, contributing indirectly to land-use change.

These issues can be addressed through clearer, evidence-based criteria for awarding CCR credits. Suggested improvements are provided below.

#### 1) Evidence of fossil CO<sub>2</sub> replacement

- a) Current practice --> ISCC currently requires only a statement from the offtaker confirming fossil CO<sub>2</sub> replacement. In practice, this is not always accurate.
- b) Implications --> Risk of overstating environmental benefit where no actual fossil CO<sub>2</sub> is displaced.
- c) Suggested criteria --> Require verifiable evidence from the offtaker (e.g., invoices or supply records) for fossil CO<sub>2</sub> use within the last three years.

#### 2) Timeframe for fossil CO<sub>2</sub> replacement

- a) Current practice --> No clear timeframe defined (often assumed to be 5–10 years).
- b) Implications --> Older replacements do not reflect current market dynamics or additionality.
- c) Suggested criteria --> Define a maximum timeframe of three years to ensure genuine and current displacement of fossil CO<sub>2</sub>.

#### 3) Outcome of captured CO<sub>2</sub>

- a) Current practice --> Not clearly addressed.
- b) Implications --> Risk that CO<sub>2</sub> may ultimately be vented, negating the intended benefit.
- c) Suggested criteria --> Require demonstration of the final use or storage outcome of the captured CO<sub>2</sub> to confirm permanent or purposeful utilisation.

If you disagree that the proposed lifecycle parameters can be used to give an appropriate representation of the bioenergy LCA emissions, please state why, providing evidence where appropriate.:

86 Are there additional parameters that should be considered?

Are there additional parameters that should be considered? :

Align with EU regulations and UK practice, as well as clearly represent life cycle parameters.

### System Boundary Application

87 Do you agree with the approach on system boundary application?

Somewhat agree

If you agree with the approach on system boundary application, please provide evidence to support your response, including sector-specific impacts where possible.:

Align system boundaries with scheme objectives by employing greater detail and specificity. Support harmonised boundary principles, but require sector-appropriate modules capturing AD-specific material effects. Moreover, publish clear guidance on allocation rules and co-product handling to reduce interpretation variance.

Where full harmonisation is not feasible, it should at minimum be mandatory to provide transparent labelling and documentation that clearly state which lifecycle stages are included or excluded for each technology, so that policymakers and market participants can make like-for-like comparisons and avoid misleading claims.

The challenge is that system boundaries are frequently inconsistent and can be easily misinterpreted. For solar PV, multiple LCAs show that around 60–70% of lifecycle emissions arise upstream, primarily from materials sourcing, manufacturing, and construction, while only a small share is associated with operation. Yet in many reporting frameworks, only operational emissions are routinely disclosed, so a large portion of embedded emissions never appears in headline figures.

This inconsistency is visible in the UK Government GHG Conversion Factors produced by DESNZ/Defra, where biomethane is assigned well-to-tank (WTT) factors that reflect a cradle-to-grave or cradle-to-gate style lifecycle boundary, whereas equivalent construction-phase emissions for solar PV are not explicitly represented in the main electricity generation factors. When a consistent lifecycle boundary is applied, the carbon intensity (CI) of a well-operated biomethane plant can be broadly comparable to that of solar PV, once upstream construction and manufacturing emissions are fully

included.

If you disagree with the approach on system boundary application, please provide evidence to support your response, including sector-specific impacts where possible.:

## ILUC Emissions Within GHG Criteria

88 Do you agree that there should be a requirement for ILUC values to be reported separately for crop-based feedstocks by all future biomass policies?

Somewhat disagree

If you agree that there should be a requirement for ILUC values to be reported separately for crop-based feedstocks by all future biomass policies? Please provide evidence to support your response.:

If you disagree that there should be a requirement for ILUC values to be reported separately for crop-based feedstocks by all future biomass policies? Please provide evidence to support your response.:

ILUC should be used as a policy development tool, rather than a component of reporting. See Q24 for more details.

89 How could the GHG criteria lifecycle assessment be expanded to include accurate ILUC emissions in the future? Please provide evidence to support your response.

How could the GHG criteria lifecycle assessment be expanded to include accurate ILUC emissions in the future? Please provide evidence to support your response. :

Due to the basis of ILUC calculation, requiring application of economic modelling at a global level, accurate estimates are incredibly difficult, if not impossible, to develop. Equally, the accuracy of estimates is subject to price and policy developments, and so will change over time. ILUC should rather be used as a policy development tool, rather than a component of reporting.

Moreover, as ILUC value are specific to a demand shock in a given jurisdiction, UK ILUC factors should be calculated specific to the implementation of UK policy, rather than taken from ILUC estimates calculated for other geographies.

90 To ensure consistency, and to minimise reporting costs, should those reporting on ILUC values, and incorporating them into GHG criteria life cycle assessments, be obliged to base such values on future government provided coefficients?

No

If you answered that those reporting on ILUC values, and incorporating them into GHG criteria life cycle assessments, should be obliged to base such values on future government provided coefficients, please state why, providing evidence where appropriate.:

If you answered that those reporting on ILUC values, and incorporating them into GHG criteria life cycle assessments, should not be obliged to base such values on future government provided coefficients, please state why, providing evidence where appropriate.:

ILUC should be used as a policy development tool, rather than a component of reporting. See Q24 for more details.

91 Are there other ways in which ILUC could be addressed within the common biomass sustainability framework? Please provide evidence to support your response.

Are there other ways in which ILUC could be addressed within the common biomass sustainability framework? Please provide evidence to support your response. :

ILUC should be used as a policy development tool, rather than a component of reporting. See Q24 for more details.

## Soil Carbon Accounting

92 What could be done to further improve data collection and monitoring of soil carbon accounting?

What could be done to further improve data collection and monitoring of soil carbon accounting?:

Improve data collection and monitoring of soil carbon accounting primarily through standardized measurement protocols.

Overall lessons:

- Different methodologies for measuring SOC will likely provide different baselines. Therefore, a consistent methodology is essential for tracking changes through time and doing comparisons against others.

- Each method has its own advantages and disadvantages (Table 2). SOC baselining purely done by soil sampling is time intensive, expensive, and may be challenging to do at scale. However, it is easier to have confidence in the results. By contrast, using satellite data and modelling allows immediately inferring interannual changes in SOC at scale, but may potentially have limitations in areas with diverse soil types.

- Differences between results for the carbon stock may depend on assumptions about the bulk density of the soil and the stony fraction.
- The depth to which soil organic carbon is reported may also differ between companies, so care needs to be taken when comparing values.

## Default Values

93 What other considerations should be made when defining or updating default values in line with the common framework GHG life cycle parameters?

What other considerations should be made when defining or updating default values in line with the common framework GHG life cycle parameters?:

The EU is currently consulting on proposed revision of the GHG emissions saving methodology under Annex V and VI of RED, this includes a proposal to apply an uplift of the adjustment factor to 40% in the calculation of default values from typical values for woody biomass supply chains.

REA does not support this proposal, on the basis this update applies an overly conservative adjustment and does not pay due regard to Paragraph 5 of Article 31 of the Directive, which states that 'where the contribution of a factor to overall emissions is small, where there is limited variation, or where the cost or difficulty of establishing actual values is high, the default values shall be typical of normal production processes'.

## Approach to Setting GHG Savings Thresholds by Sector

94 Do you agree that thresholds under the GHG criteria should be set by individual biomass policies instead of a single cross-sector biomass supply chain threshold?

Strongly agree

If you agree that thresholds under the GHG criteria should be set by individual biomass policies instead of a single cross-sector biomass supply chain threshold, please provide evidence to support your response.:

Thresholds under the GHG criteria should be set by individual biomass policies rather than a single cross-sector biomass supply chain threshold, this will ensure there is appropriate consideration for the distinct characteristics and supply chains of different biomass applications, including the potential for overall emissions savings based on displacement of fossil or other high carbon alternatives.

If you disagree, please explain why, providing evidence where appropriate?:

95 Do you agree with the proposed considerations in determining appropriate thresholds and that these can achieve meaningful decarbonisation across different bioenergy sectors?

Somewhat agree

If you agree with the proposed considerations in determining appropriate thresholds and that these can achieve meaningful decarbonisation across different bioenergy sectors, please provide evidence to support your response.:

If you disagree with the proposed considerations in determining appropriate thresholds and that these can achieve meaningful decarbonisation across different bioenergy sectors, please provide evidence to support your response.:

Are there other key considerations that should be factored in? Please provide evidence to support your response.:

It may also be beneficial to consider the carbon intensity of displaced fossil fuels from consuming biomass. Also, recovering waste wood as a fuel landfill is avoided saving methane emissions. The carbon impact of the entire supply-chain process should be considered given to the tightening carbon reduction trajectory.

96 Are there alternative ways to set a threshold for bioenergy pathways?

Yes

If there are alternative ways to set a threshold for bioenergy pathways, please explain how this could be achieved?:

Alternatives include intensity or performance-based thresholds.

## Feedstocks in Scope of GHG Criteria

97 Do you agree with the proposed feedstocks in scope of the GHG criteria as shown in table 4.1?

Somewhat agree

If you agree with the proposed feedstocks in scope of the GHG criteria as shown in table 4.1, please provide evidence to support your response, including sector-specific impacts where possible.:

Under Directive (EU) 2018/2001 (RED II) Annex V, wastes and residues are assigned zero life-cycle greenhouse gas (GHG) emissions up to the process of collection. For domestically sourced post-consumer waste wood that has already been discarded and entered the waste management system, upstream emissions should be excluded from accounting and assigned zero GHG value, ensuring that emissions are only attributed from the stage at which the feedstock becomes operationally relevant for energy recovery.

If you disagree with the proposed feedstocks in scope of the GHG criteria as shown in table 4.1, please provide evidence to support your response, including sector-specific impacts where possible.:

98 What are the barriers and challenges (if any) in accounting for GHG emissions from wastes, including mixed wastes?

What are the barriers and challenges (if any) in accounting for GHG emissions from wastes, including mixed wastes? :

Accounting for GHG emissions from waste feedstocks is challenging due to variable composition, limited data on handling and prior use, and difficulties in allocating emissions across co-mingled materials. Therefore, applying GHG criteria from when the waste material is consolidated for energy recovery provides a more proportionate GHG accounting criteria. Processing and distribution emissions should be accounted for by the feedstock supplier. Establishing industry-wide guidance could better standardize accounting procedures.

## Compliance With GHG Criteria

99 Should the methods for reporting greenhouse gas (GHG) emissions savings be kept in line with existing criteria?

Yes

If the methods for reporting greenhouse gas (GHG) emissions savings should not be kept in line with existing criteria, please outline what changes should be made.:

Align with existing criteria and certification schemes. This will ensure alignment with certification schemes which will help to derisk as industry is well experienced with existing criteria and certification schemes.

This should include retaining the option for using 'standard data' as part of the actual value method, as set out in the RO guidance; "In calculating emissions, the actual value method does not specify that all values must be actual data. An operator can use the actual data relevant to their specific supply chain alongside standard input data from relevant sources such as academic literature.

100 Please highlight any specific cost implications to your business/sector in meeting the proposed GHG criteria. Please provide evidence to support your response.

Please highlight any specific cost implications to your business/sector in meeting the proposed GHG criteria. Please provide evidence to support your response. :

Many companies in the biomass power sector have led the way in developing systems in to meet the proposed GHG criteria and so would unlikely incur any significant costs. However, these systems have taken significant time and resources to develop. Accordingly, the development of similar systems in other sectors that have not previously been regulated on their GHG emissions can be expected to have cost implications. Cost implications may include audits, data systems, and LCA modelling.

## Application of GHG Criteria to Non-Bioenergy Uses

101 How can life cycle GHG emissions from non-energy uses of biomass best be calculated, taking account of methodological challenges?

How can life cycle GHG emissions from non-energy uses of biomass best be calculated, taking account of methodological challenges?:

Life cycle GHG emissions for non-energy uses of biomass should be calculated using modular, purpose-specific LCAs rather than methodologies derived from bioenergy policy. A mass- or product-based functional unit should be used, system boundaries must reflect realistic end-of-life pathways. Activities such as reuse, recycling, long-term sequestration, and BECCS will have a net positive effect on reducing GHG. Allocation rules should be transparent. Early implementation should rely on guidance rather than mandatory thresholds to avoid unintended barriers to circular and innovative uses of biomass.

102 At what points in the material life cycle is it most feasible to collect data on GHG emissions for non-fuel uses of biomass?

At what points in the material life cycle is it most feasible to collect data on GHG emissions for non-fuel uses of biomass? :

Collecting data on GHG emissions for non-fuel uses are most feasibly conducted at feedstock collection, primary processing, and product manufacture, as opposed to end-use periods which may vary by context.

103 What is your view on the preferred declared or functional unit of expression for LCAs for non-fuel uses of biomass, as an alternative to gCO<sub>2</sub>e/MJ?

What is your view on the preferred declared or functional unit of expression for LCAs for non-fuel uses of biomass, as an alternative to gCO<sub>2</sub>e/MJ?:

Mass-based functional units are appropriate, with supplementary measurements as needed. Functional units should be developed to represent the societal value of the product. This is especially important for determining emission savings, ensuring equivalence between biomass supply chains and

alternative products (e.g. fossil fuels, concrete, steel etc.).

104 Do you believe that there exists a sufficient evidence base to set default values of biomass sustainability for non-energy uses?

Is there a sufficient evidence base to set default values of biomass sustainability for non-energy uses? :

No, there is not currently a sufficient evidence base to set default values.

## Chapter 5: Monitoring, Reporting and Verification (MRV)

### Harmonising Feedstock Definitions

105 Do you agree that biomass feedstock definitions need to be harmonised across end-use sectors?

Strongly agree

If biomass feedstock definitions should be harmonised, how broad or granular should these categories or definitions be? Please provide examples.:

Biomass feedstock definitions should be harmonised across end-use sectors and certification schemes to improve consistency, reduce market distortion, and minimise duplication in reporting. Biomass is traded across power, heat, BECCS and SAF applications, so inconsistent definitions create unnecessary complexity and compliance risk.

Harmonisation should follow a tiered taxonomy approach: a limited number of clear top-level categories (e.g. wastes and residues, rotational energy crops, forestry biomass, food/feed crops), supported by sub-categories only where greater granularity materially affects sustainability outcomes, carbon intensity, or audit risk. A "minimum necessary granularity" principle should apply to avoid unnecessary complexity.

Definitions should align with established international and existing regulatory frameworks, including EU RED II/III where appropriate, to maintain interoperability and reduce administrative burden. However, alignment should not create unintended consequences. In particular, definitions that restrict categories such as "industrial roundwood" should not be adopted where existing cascading principles and market mechanisms already ensure material is directed to its highest economic and environmental value.

It is also important to recognise that feedstock values and classifications vary by region, and that demand for low-grade fibre can support forest health, resilience and local economies. Any transition toward harmonised definitions should therefore be carefully managed across sectors and schemes to avoid adverse market impacts.

If you disagree that biomass feedstock definitions should be harmonised, please provide evidence to support your response. :

106 Are there any other improvements to the feedstock type reporting process that should be considered?

Are there any other improvements to the feedstock type reporting process that should be considered?:

Prioritize clear guidance to clarify sectoral regulation and mixed-waste treatment. Consider adopting a lifecycle-based categorisation approach for feedstock reporting, including:

- Classification based on the stage in the material lifecycle
- Recognition of cascading use principles
- Distinguishing primary biomass from end-of-life waste streams

This approach aligns with cascading use principles and better reflects the real sustainability impact of different feedstocks.

### Mandating Reporting of Biomass Country of Origin

107 Do you agree that biomass feedstock country of origin reporting should be mandatory, with certain exemptions?

Strongly agree

If you agree that biomass feedstock country of origin reporting should be mandatory, with certain exemptions, please state why, providing evidence where appropriate.:

Biomass feedstock country-of-origin reporting should be mandatory to strengthen transparency, traceability and compliance across bioenergy markets.

Mandatory reporting is already required under biomass power CfD contracts, and it is important that the wider framework aligns with this approach to ensure consistency across end-use sectors and avoid regulatory fragmentation. Origin data is particularly critical for high-value, globally traded waste streams (e.g. used cooking oil), where fraud and misclassification risks have been identified. Robust origin reporting supports risk-based auditing and protects market integrity.

However, exemptions should apply on a proportionate basis. For genuinely low-risk domestic waste and agricultural supply chains — where provenance is inherently known and fraud risk is low — overly burdensome reporting may add cost without improving sustainability outcomes. Similarly, certain

end-of-life waste materials operating under cascading use principles (e.g. low-grade waste wood) move through complex waste management systems where precise country-of-origin tracing may be disproportionate or duplicative, particularly where origin and movement are already controlled under waste shipment regulations.

In summary, country-of-origin reporting should be mandatory as a default requirement, aligned with biomass power CfDs, but implemented with targeted, risk-based exemptions to avoid unnecessary administrative burden while maintaining strong controls for higher-risk feedstocks.

If you disagree that biomass feedstock country of origin reporting should be mandatory, with certain exemptions, please state why, providing evidence where appropriate.:

108 Please state which feedstocks should be exempt from country of origin reporting. Please provide evidence to support your response.

Please state which feedstocks should be exempt from country-of-origin reporting? Please provide evidence to support your response.:

Waste-derived feedstocks, such as Grade C waste wood sourced from domestic suppliers, should be exempt from country-of-origin reporting. Grade C waste wood from construction, demolition, and municipal waste is regulated under the UK waste management framework, with transfers documented via Waste Transfer Notes and enforced by the Environment Agency. These mechanisms already ensure robust traceability of domestic suppliers and lawful end use without requiring detailed tracking of the timber's original geographic source. Once Grade C waste wood enters the domestic waste stream, often after multiple prior uses, it becomes part of the aggregated waste supply chain rather than a primary biomass product. Its processing is driven by waste management logistics, not forestry sourcing. Accordingly, it should not be treated like virgin biomass, where country-of-origin reporting is feasible and relevant to sustainability assessments. Attempting to trace the original harvest source of mixed or post-consumer waste wood is generally impractical, disproportionate, and would impose administrative burdens without meaningful sustainability benefits.

### Reporting of Minimum Sustainability Metrics in Standardised Format

109 Do you agree there should be a list of minimum sustainability metrics that are collected and reported to the relevant delivery body?

Strongly agree

If you agree, please explain your answer, including examples of sustainability metrics that could be included.:

Metrics should be tailored to the feedstock type, avoiding measures that are irrelevant for certain materials. Align with existing schemes and prioritize the metrics' quality.

If you disagree that there should be a list of minimum sustainability metrics that are collected and reported to the relevant delivery body, please state why, providing evidence where appropriate.:

110 How should a list of minimum sustainability metrics that are collected and reported to the relevant delivery body be achieved in practice?

How should a list of minimum sustainability metrics that are collected and reported to the relevant delivery body be achieved in practice?:

When establishing the metrics, the framework should focus on the quality of the metric rather than the overall quantity of metrics required. The metrics should also align with certification schemes, international schemes and the level of audit required to ensure the right data is collected and reported. Efforts should be made to align the reporting requirements with the type of data collected, to support efficiency, transparency and to protect commercial sensitivity.

111 What potential barriers or challenges, including cost implications, need to be overcome to achieve standardisation of reporting?

What potential barriers or challenges, including cost implications, need to be overcome to achieve standardisation of reporting?:

No response.

### Improving Transparency of Sustainability Data

112 Do you agree with the proposal on publishing relevant sustainability data?

Strongly agree

If you agree with the proposal on publishing relevant sustainability data, please provide evidence to support your response.:

Agree with the proposal for relevant delivery bodies to publish detailed and relevant sustainability data, aligning with the existing processes in place, i.e. Ofgem publishing annual RO sustainability profiling data.

The approach to publishing sustainability data should be consistent across schemes to ensure transparency and comparability between biomass applications.

If you disagree with the proposal on publishing relevant sustainability data, please provide evidence to support your response.:

113 Which data points should be included to improve the transparency of sustainability practices across the biomass incentive schemes? Please provide evidence to support your response.

Which data points should be included to improve the transparency of sustainability practices across the biomass incentive schemes? Please provide evidence to support your response.:

No response.

114 Are there any data points that should not be included? Please provide evidence to support your response.

Are there any data points that should not be included? Please provide evidence to support your response. :

The reporting should be amalgamated and anonymised to protect commercially sensitive information.

## Improving and Harmonising Verification Processes

115 Overall, do you agree that there should be a risk assessed approach to carrying out third-party audits?

Somewhat agree

If you agree that there should be a risk assessed approach to carrying out third-party audits, please state why, providing evidence where appropriate.:

In principle, a risk-assessed approach to third-party audits is appropriate, provided it is genuinely proportionate and clearly differentiated by feedstock type and supply chain risk.

REA members operate across a range of models, from complex international forest biomass supply chains to domestic waste biomass and AD facilities. These pathways present materially different risk profiles. A risk-based framework should recognise that operators using waste biomass or simple domestic supply chains are inherently lower risk and should not be subject to escalated assurance requirements without clear justification.

A well-designed risk approach would allow government and auditors to focus scrutiny where inherent compliance risk, materiality and supply chain complexity are greatest, while avoiding unnecessary cost burdens on low-risk operators. However, if poorly designed, risk scoring could either create loopholes or result in all participants being treated as high risk, undermining proportionality.

Farm AD installations commonly utilise on-farm manures, slurries, crop residues and locally sourced agricultural materials originating from a single holding or a small number of neighbouring farms. These supply chains are inherently short, physically verifiable, and already subject to multiple existing regulatory controls relating to agricultural practice, waste management and environmental permitting. As a result, the inherent sustainability and traceability risk profile of such schemes is materially lower than that associated with internationally traded biomass or complex multi-party supply chains.

Please consider whether a small-scale AD threshold and a small-scale composting threshold could be set, below which third-party audits would not be required (as audit costs would be disproportionate to CBSF-relevant risks). The thresholds for third-party, audit-exempt, small-scale AD facilities and small-scale composting facilities could also set a minimum proportion of input types that are; a) wastes, and b) beneficial to anaerobically digest or compost rather than spread on land untreated. Key waste types to consider are manures and slurries, and probably also bedding after its use by farmed animals.

A proportionate risk-based audit regime should therefore recognise that:

- feedstock origin is often directly observable and independently evidenced through normal farm records;
- material flows are stable and geographically constrained;
- operators frequently lack the administrative scale of large industrial installations;
- excessive audit frequency or assurance requirements can disproportionately impact scheme viability relative to environmental risk.

Without explicit proportionality safeguards, audit costs risk becoming a structural barrier to smaller agricultural AD deployment, despite these schemes delivering significant methane abatement, nutrient recycling and rural decarbonisation benefits.

The REA therefore recommends that the framework explicitly enables:

- reduced audit frequency or simplified assurance pathways for low-risk farm-based AD systems;
- recognition of existing agricultural assurance and regulatory datasets to avoid duplicate evidence collection;
- allowance for grouped or cooperative audit approaches where multiple farms supply a single AD facility;
- escalation to higher assurance levels only where clear risk indicators are identified.

This approach would ensure that assurance effort is aligned with genuine sustainability risk, while supporting continued deployment of farm-scale AD as part of the UK's circular agricultural economy.

Published criteria, transparent methodology and clear triggers for escalation would be essential to ensure the system is targeted, credible and workable in practice.

If you disagree that there should be a risk assessed approach to carrying out third-party audits, please state why, providing evidence where appropriate.:

116 Do you agree the risk assessment should determine whether a 'reasonable' or 'limited' assurance audit needs to be carried out?

Somewhat agree

If you agree the risk assessment should determine whether a 'reasonable' or 'limited' assurance audit needs to be carried out, please state why, providing evidence where appropriate.:

We recognise that robust sustainability reporting is essential to ensure biomass delivers genuine environmental benefits and to maintain public confidence. Assurance frameworks play a critical role in underpinning this credibility.

In principle, it is reasonable that a risk assessment determines whether limited or reasonable assurance is required. Higher-risk supply chains may justify enhanced scrutiny. Under the low-carbon dispatchable CfD, reasonable assurance is required, representing a significant step up from limited assurance and demonstrating the direction of travel for higher-risk or higher-value schemes. A consistent approach across government support mechanisms would provide clarity and avoid fragmentation.

However, proportionality is critical. Limited assurance already applies a risk-based methodology, focusing on material data points through sampling, targeted site visits and desk-based review. For many domestic operators, particularly those using waste biomass with relatively simple and well-established supply chains, this approach provides robust oversight without imposing disproportionate administrative and cost burdens.

Reasonable assurance can significantly increase verification requirements, potentially extending to very high levels of document testing and substantially greater audit resource. For operators handling large volumes, this may become operationally impractical if applied indiscriminately.

Accordingly, while risk assessment should inform the level of assurance, escalation to reasonable assurance must be clearly justified by inherent compliance risk, supply chain complexity or materiality. A blanket shift would risk imposing excessive burden without corresponding sustainability benefit. The framework should therefore ensure transparent criteria and genuine differentiation between low- and higher-risk pathways.

If you disagree that the risk assessment should determine whether a 'reasonable' or 'limited' assurance audit needs to be carried out, please state why, providing evidence where appropriate.:

117 Do you agree the risk assessment should determine the frequency of auditing?

Neutral

If you agree the risk assessment should determine the frequency of auditing, please state why, providing evidence where appropriate.:

A standardised approach to audit frequency would provide consistency across the sector. If a risk-based approach is adopted, it is particularly important to align reporting frequency to ensure comparability, especially where different operators are subject to different assurance levels. While auditing should reflect risk, for many low-risk pathways, an annual review is likely sufficient, avoiding unnecessary administrative burden while maintaining effective oversight.

If you disagree that the risk assessment should determine the frequency of auditing, please state why, providing evidence where appropriate.:

118 What are the differences in the financial and resourcing burden involved in carrying out 'reasonable' versus 'limited' assurance audits? Please provide evidence to support your response.

What are the differences in the financial and resourcing burden involved in carrying out 'reasonable' versus 'limited' assurance audits? Please provide evidence to support your response. :

'Reasonable' assurance audits involve a significantly higher financial and time burden than 'limited' assurance, requiring more extensive document review, verification, and staff resources. In practice, meeting deadlines under a 'reasonable' audit regime would likely be unachievable for operators due to the additional workload and associated costs.

119 What effect would the requirement of reasonable assurance have on government incentive scheme participants? Please provide evidence to support your response.

What effect would the requirement of reasonable assurance have on government incentive scheme participants? Please provide evidence to support your response.:

Requiring 'reasonable' assurance would place a disproportionate administrative and financial burden on government incentive scheme participants. The current system is already robust, providing sufficient oversight and sustainability verification, so introducing a more intensive audit would add complexity without improving outcomes.

## Benchmarking of Certification Schemes

120 Do you agree that benchmarking exercises for voluntary certification schemes should be at intervals no greater than five years?

Somewhat agree

If you agree that benchmarking exercises for voluntary certification schemes should be at intervals no greater than five years, please state why, providing evidence where appropriate.:

Five years is an appropriate interval for voluntary certification schemes' benchmarking exercises. Prioritise robust, proportional alignment with existing schemes.

If you disagree that benchmarking exercises for voluntary certification schemes should be at intervals no greater than five years, please state why, providing evidence where appropriate.:

## Introduce Additional Monitoring/Verification of Voluntary Certification Schemes in Benchmarking Process

121 Do you agree that VCSs should be required to disclose the following measures as part of the benchmarking process?

Somewhat agree

Somewhat agree

Somewhat agree

Somewhat agree

Please provide evidence to support your response:

Many voluntary certification schemes use a variety of checks and balances to ensure the credibility and reliability of the certification process; this includes managing conflicts of interest. For example, the SBP website outlines the different measures within the certification process<sup>1</sup>:

- Certification Body: Independent Certification body accredited by an independent Accreditation body is responsible conducting audits to determine if the organisation seeking certification meets the requirements. The Certification Body must comply with 17065, ISO 19011 and SBP Standard 3 when auditing organisations seeking certification. The independent certification body is responsible for all certification decisions including issuance, retention and withdrawal of a certificate.

- Accreditation Body: Assesses and accredits certification bodies to ensure their competence, impartiality and adherence to established guidelines. Accreditation bodies must comply with ISO 17011 when assessing and accrediting Certification bodies

- Independent Auditor: Auditors employed / contracted by the Certification body must be trained and meet the requirements defined in SBP Standard 3. Auditors are expected to maintain impartiality and integrity throughout the audit process, ensuring fair and unbiased assessments, following the relevant requirements of ISO 19011.

- Peer review: To ensure the quality and consistency of audit reports and certification decisions, SBP has established a CB Peer Review Process. SBP Standard 3 outlines the requirements for Peer Reviewers who are subject to the same requirements relating to conflict of interest as other Certification Body personnel with influence on the certification decision.

122 Do you agree that operators should be required to provide a declaration that they are independent from the VCS, and to declare any actual or perceived conflicts of interest?

Somewhat agree

If you agree that operators should be required to provide a declaration that they are independent from the VCS, and to declare any actual or perceived conflicts of interest, please state why, providing evidence where appropriate.:

If you disagree that operators should be required to provide a declaration that they are independent from the VCS, and to declare any actual or perceived conflicts of interest, please state why, providing evidence where appropriate.:

123 Do you agree that auditors carrying out ISAE3000 audits should rotate on a more frequent basis to provide more objective outputs and mitigate the risk of bias and conflicts of interest?

Somewhat disagree

If you agree that auditors carrying out ISAE3000 audits should rotate on a more frequent basis to provide more objective outputs and mitigate the risk of bias and conflicts of interest, please state why, providing evidence where appropriate.:

If you disagree that auditors carrying out ISAE3000 audits should rotate on a more frequent basis to provide more objective outputs and mitigate the risk of bias and conflicts of interest, please state why, providing evidence where appropriate.:

While regular auditor rotation can help mitigate bias and conflicts of interest, more frequent rotation in the biomass sector would likely cause more harm than benefit. The small pool of auditors with biomass-specific expertise means frequent changes risk loss of contextual knowledge, reduced audit efficiency, and disruption of established practices. There is no evidence that increased rotation improves audit quality or objectivity. A reasonable rotation period, such as the suggested 10-year limit, may be appropriate to balance independence with continuity and sector expertise.

## Emerging MRV Practices: Supply Chain Site Visits and Inspections

124 What challenges and barriers to implementing supply chain visits and inspections are you aware of? For example, are there specific feasibility or cost concerns with overseas site visits?

What challenges and barriers to implementing supply chain visits and inspections are you aware of? For example, are there specific feasibility or cost concerns with overseas site visits?:

Challenges include the high cost and limited feasibility of overseas site visits, as well as the additional time required for new auditors to familiarise themselves with plants and processes. Robust chain-of-custody documentation is a more practical way to verify sustainability, and differences in international waste definitions can complicate consistent assessment across jurisdictions.

125 What benefits do you see this providing to the monitoring and assurance of biomass sustainability?

What benefits do you see this providing to the monitoring and assurance of biomass sustainability? :

No response.

### Emerging MRV Practices: Powers to Request Data

126 Should incentive schemes have the ability to request data relating to biomass sustainability from any body involved in the certification, auditing and evidence generation process?

Yes

If you think that incentive schemes should have the ability to request data relating to biomass sustainability from any body involved in the certification, auditing and evidence generation process, please provide evidence to support your response. :

Access to data from across the supply chain could, in theory, provide reassurance to incentive scheme operators. In practice, however, this may involve a very wide scope of information from multiple supply chain tiers, much of which operators may not have direct access to. If additional information is needed from suppliers, it may be more appropriate for the government to request it directly to ensure clarity, accountability, and efficiency. Data requests should remain proportionate and pragmatic, focusing on what is necessary to demonstrate compliance with the sustainability criteria and reflecting the realities of market operations.

If you think that incentive schemes should not have the ability to request data relating to biomass sustainability from any body involved in the certification, auditing and evidence generation process, please provide evidence to support your response. :

127 Should incentive schemes have the ability to require participants to include data sharing provisions in contractual agreements with third parties?

Yes

If you think incentive schemes should have the ability to require participants to include data sharing provisions in contractual agreements with third parties, please provide evidence to support your response.:

This is often the blocker to auditing certain areas – plants should understand this at the start.

If you think incentive schemes should not have the ability to require participants to include data sharing provisions in contractual agreements with third parties, please provide evidence to support your response.:

128 What barriers (including costs) are there to implementing data sharing as described?

What barriers are there to implement data sharing as described:

No response.

### Emerging MRV Practices: Other

129 Do you have any additional views on current MRV practices that have not been captured by questions above?

Do you have any additional views on current MRV practices that have not been captured by questions above? :

Some of the proposed MRV enhancements, such as additional site visits, exhaustive document reviews, or duplicative data reporting, would add significant cost and administrative burden without a clear return on sustainability outcomes. For example, requiring operators to audit every individual waste transfer note (WTN) in a plant receiving thousands of deliveries per year would be highly resource-intensive and largely duplicative. The current system, under the Waste Duty of Care Code of Practice, already requires WTNs, which provide a practical, legally monitored audit trail for tracking biomass sustainability. WTNs are overseen by the Environment Agency, ensuring feedstock traceability. End operators should not be held responsible for suppliers' operational practices or accreditation compliance, as this is outside their control and would create disproportionate administrative burden.

130 Please provide any suggestions for strengthening MRV practices that are not outlined above, including as much detail as possible.

Please provide any suggestions for strengthening MRV practices that are not outlined above, including as much detail as possible.:

There may be opportunities to further bolster MRV practices through greater alignment, improved use of digital technology, and a more proportionate, risk-based approach. One area for consideration is greater alignment of MRV requirements and reporting periods across schemes such as the CfDs, RO, FIT, RHI, DNRHI and GGSS. A more unified approach, including alignment to common reporting cycles (for example calendar quarters for biomethane injection), could help streamline processes, reduce duplication, and lower administrative burden, particularly for smaller-scale operators. Aligning requirements in this way would also help focus reporting and assurance on the most critical risk areas, such as accurate GHG calculations, methane emissions management, and metering at injection points.

There is also an opportunity to better utilize digital technology to support this alignment, including the development of shared digital systems for Proofs of Sustainability. Digitalization could sit at the core of any future reform, if costs to businesses are clearly understood; the return on investment is demonstrable, and appropriate support is built for smaller operators.

Finally, Government may wish to engage with Annual Sustainability Report authors and auditors through a technical roundtable to identify where reporting could be streamlined further. This would help distinguish genuinely risk-critical information from low-value or repetitive requirements, ensuring MRV effort is targeted where it delivers the greatest assurance benefit.

## MRV: Enforcement Guiding Principles

131 Do you agree with the outlined enforcement guiding principles?

Somewhat agree

If you agree with the outlined enforcement guiding principles, please state why, providing evidence where appropriate.:

The principles provide a sensible framework for managing compliance through incentive schemes, but greater clarity is needed to ensure fairness and regulatory certainty. Withholding payments and certificate revocation should have defined timelines to avoid prolonged financial uncertainty, and civil penalties or redress payments should be proportionate to the severity of non-compliance. Consideration should also be given to how compliance will be monitored if the framework is applied to non-subsidised biomass, as oversight powers for non-licensed entities may be limited.

If you disagree with the outlined enforcement guiding principles, please state why, providing evidence where appropriate.:

## MRV: Passing on delivery body cost for enhanced scrutiny of non-compliant entities

132 What are your views on including a mechanism in future policy design to pass on costs of investigating non-compliant entities? Please provide evidence to support your response.

What are your views on including a mechanism in future policy design to pass on costs of investigating non-compliant entities? Please provide evidence to support your response.:

Operators should not be responsible for the costs of investigating non-compliant entities beyond the scope of reasonable audit requirements. Passing such costs onto compliant operators would be unfair, disproportionate, and could create a financial barrier to participation in sustainability schemes.

A risk-based, proportionate MRV system with practical verification, clear reporting metrics, and supplier accountability focused where it is most meaningful is essential. Excessive or duplicative requirements, such as country-of-origin reporting or overly burdensome audits, would increase administrative and financial burdens without improving sustainability outcomes. Evidence-based, practical measures can maintain robust sustainability assurance while supporting efficient deployment of domestic waste-to-energy and the UK's net-zero objectives.

133 What is the appropriate forum for resolving disputes over the amount of costs charged to a non-compliant entity, for example a first-tier tribunal, or independent auditor?

What is the appropriate forum for resolving disputes over the amount of costs charged to a non-compliant entity, for example a first-tier tribunal, or independent auditor?:

No response.

## Conclusion

134 Do you consider there to be any longer-term implications that have not already been addressed in this consultation, including costs to sectors, business, or consumers?

Do you consider there to be any longer-term implications that have not already been addressed in this consultation, including costs to sectors, business, or consumers?:

REA broadly welcomes the UK and EU intentions to strengthen bilateral cooperation, including linking emissions trading schemes and potential UK participation in the EU internal electricity market. Closer alignment could support cross-border investment in decarbonisation projects, including renewable energy and carbon removals, and contribute to greater carbon market stability.

However, dynamic alignment with EU rules could pose longer-term risks for UK bioenergy:

- It may restrict future support for unabated forest biomass installations. For example, Article 3 of REDIII prohibits Member States from granting or

renewing support for electricity-only installations using forest biomass, with some exceptions for BECCS. Without appropriate exemptions, this could impact UK energy security and the ability to support existing or new biomass projects.

- It could impose additional regulatory and compliance requirements. The EU Deforestation Regulation (EUDR) introduces geolocation and traceability obligations that could be particularly challenging for secondary/sawmill residues, especially from regions with fragmented private land ownership.

- It may limit UK policy divergence in the future, including on ETS accounting for bioenergy and approaches to carbon removals. Dynamic alignment could constrain the UK's ability to adapt policies independently as circumstances change.

To manage these risks, REA recommends that any dynamic alignment process includes clear safeguards to allow exemptions for UK bioenergy, excludes overly burdensome regulations such as the EUDR from scope, and establishes a formal process for reviewing future EU regulatory changes to protect UK interests.

135 Do you have any further comments or suggestions across all policy proposals included in this consultation in relation to the objectives (set out above and in chapter 1), including on the costs and practicalities.

Do you have any further comments or suggestions across all policy proposals included in this consultation in relation to the objectives (set out above and in chapter 1), including on the costs and practicalities.:

The REA supports the framework's objectives. Delivery must be proportionate, clearly differentiate feedstocks, protect domestic waste wood recovery, and support net-zero, circular economy, and energy security goals.