

## Common Biomass Sustainability Framework consultation

February 2026

### About the Institute of Chartered Foresters (ICF)

The Institute of Chartered Foresters is the Royal Chartered body for foresters and arboriculturists in the UK. We represent over 2,300 members working across forestry, arboriculture, and related disciplines in the private and public sectors, academia, and research institutions. Our mission is to uphold professional standards, provide guidance, and support sustainable management of trees and forests.

### Response

The ICF has only considered the questions in a UK context.

Chapter 1 – A Common Sustainability Framework: Pages 15 to 29	
<p><b>1. Do you agree that the initial scope of the framework should be limited to bioenergy that is subject to government incentive schemes? If not, please explain why and provide evidence to support your response.</b></p>	<p>Yes. The framework should initially apply to bioenergy supported by government schemes, with potential future extensions.</p>
<p><b>2. 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?</b></p>	<p>Yes. A policy guidance document with scheme level embedding preserves flexibility and avoids creating slow to update primary legislation.</p>
<p><b>3. Should government consider a legislative route for implementing the common sustainability framework in the future, including expanding for non-subsidised uses? Please provide evidence to support your response.</b></p>	<p>Cautiously, yes. Only once evidence shows stable criteria and robust MRV and provided review and update mechanisms prevent regulatory lag relative to UK Forestry Standard (UKFS)/ Timber Standard for Heat and Electricity (TSHE) and international standards.</p>
<p><b>4. 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? (pages 22-23)</b></p>	<p>Tentatively, if there is a replacement support scheme, retain and evolve BSL as a familiar preapproval/MRV channel for smaller heat users; leverage its quarterly reporting and risk-based audit processes to phase in Common Biomass Sustainability Framework (CBSF) changes and provide supplier training/CPD.</p>

**5. Do 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.**

Yes. A formal 5-year review cycle with interim technical updates (e.g., factors, risk lists) aligns with the consultation intent and sector expectations.

#### **Chapter 2 – Biomass Feedstock Categories & Definitions: Pages 29 to 33**

**6. Do you agree with the list of key feedstock categories and their definitions in scope of the common framework? Please provide evidence to support your response.**

Broadly yes but definitions must be consistent, unambiguous, and aligned across forestry and agriculture. Clarification of residues, wastes, SRC/SRF, and trees outside forests is required.

#### **Chapter 3 – Land criteria: Pages 34 to 75**

**7. Do you agree that the agricultural land criteria should continue to include prohibited land categories in line with existing criteria? Please provide evidence to support your response.**

Cautiously, yes. Prohibited land categories may complicate active management of ASNW, heathland scrub removal and other UK land types, even where management aligns with UKFS or UKWAS.

**8. Do you agree that the baseline should be set in January 2008? Please provide evidence to support your response or provide an alternative proposal for when the baseline should be set.**

No comment.

**9. Do you agree with the definitions of the highly biodiverse land categories given? If not, please explain why and provide evidence to support your response.**

See answer to question 7.

**10. Do you agree with the list of protected highly biodiverse land categories where sourcing is not allowed? Please provide evidence to support your response.**

See answer to question 7.

**11. 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? Please provide evidence to support your response.**

See answer to question 7.

**12. Should other highly biodiverse land categories be added? If yes, what associated sourcing requirements could be included?**

See answer to question 7.

**13. Do you agree with the definitions of high carbon stock land categories given? If not, please explain why and provide evidence to support your response.**

No comment.

**14. Do you agree with the list of protected high carbon stock land categories where sourcing is not allowed? Please provide evidence to support your response.**

No. Treatment of peatlands must reflect UK realities. Peatland definition of 30cm could mean that biomass cannot be sourced from many forestry sites in England. There is a caveat of

<p>“unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil.” - nearly all peatlands in the UK have been drained at some point – whether by forestry establishment or by farmers in the 19th Century.</p>	
<p><b>15. 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? Please provide evidence to support your response.</b></p>	
<p>See answer to question 14.</p>	
<p><b>16. Should other high carbon stock land categories be added? If yes, what associated sourcing requirements could be included?</b></p>	
<p>No comment.</p>	
<p><b>17. Should the crop cap be set at a sector level subject to sector-specific ILUC risk assessments? If not, please suggest what level a cross-sector crop cap should be set at and provide evidence to support your response.</b></p>	
<p>If, the “crop cap” was applied to the forestry sector it could become a major hurdle for forest management. If competition with food production is a genuine concern, then this crop cap should also apply to the whisky industry and the production of animal feed.</p>	
<p><b>18. If crop caps are set at a sector level, what factors should be included in the sector-specific food competition and ILUC risk assessment? What should this assessment consist of? Please provide evidence to support your response.</b></p>	
<p>See answer to question 17.</p>	
<p><b>19. What factors should be monitored at a cross-sector level to highlight emerging risks regarding food competition and ILUC risks from crop-derived feedstocks?</b></p>	
<p>See answer to question 17.</p>	
<p><b>20. How could high ILUC risk feedstocks be identified? Please suggest what factors could be considered and provide evidence to support your response.</b></p>	
<p>No comment.</p>	
<p><b>21. Should high ILUC risk feedstocks be phased out? If yes, 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).</b></p>	
<p>No comment.</p>	
<p><b>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?</b></p>	
<p>No comment.</p>	
<p><b>23. Are there any other issues (e.g. social or other environmental) that should be considered as part of the agricultural land criteria?</b></p>	
<p>No comment.</p>	

<p><b>24. Do you agree that, unless otherwise specified, all feedstocks should have to comply with the agricultural land criteria? If not, please explain why and provide evidence to support your response.</b></p>
<p>There is a need for alignment across forestry and agriculture, consistent definitions, and proportionality to avoid widening the regulatory gap between sectors. SRC is not regulated as forestry but as agriculture and does not have to comply with UKFS. In addition, agriculture and forestry are devolved issues.</p>
<p><b>25. Should dedicated energy crops be required to meet the agricultural land criteria? If not, please explain why and provide evidence to support your response.</b></p>
<p>No comment.</p>
<p><b>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.</b></p>
<p>No comment.</p>
<p><b>27. Should the types of evidence for demonstrating compliance with agricultural land criteria be kept aligned with existing criteria? If not, please outline what changes should be made.</b></p>
<p>See answer to question 24. There needs to be a levelling up or levelling down. The current level of evidence and compliance falls far below UKFS or UKWAS.</p>
<p><b>28. Please highlight any specific cost implications to your business/sector in meeting the proposed agricultural land criteria. Please provide evidence to support your response.</b></p>
<p>No comment.</p>
<p><b>29. Do you agree that the land on which the raw feedstock was grown should be subject to soil monitoring and management plans? Please provide evidence to support your response.</b></p>
<p>Most of the land from which feedstock arises is already covered by forest regulation and often a management plan. Only if SRC etc., is to be under agriculture rules would this be required.</p>
<p><b>30. 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.</b></p>
<p>No comment.</p>
<p><b>31. Do you agree that agricultural residues should comply with the soil criteria? Please provide evidence to support your response.</b></p>
<p>No comment.</p>
<p><b>32. Should “other crops” (where the whole plant is used as a bioenergy feedstock) 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.</b></p>
<p>No comment.</p>

33.	<b>Should dedicated energy crops 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.</b>
No comment.	
34.	<b>Should the types of evidence for demonstrating compliance with soil criteria be kept aligned with existing criteria? If not, please outline what changes should be made.</b>
No comment.	
35.	<b>Please highlight any specific cost implications to your business/sector in meeting the proposed soil criteria. Please provide evidence to support your response.</b>
No comment.	
36.	<b>Do you agree that the requirements for setting the principles for sustainable land management are appropriate for the common framework? If not, how could they be changed?</b>
Yes, anchored in UKFS good forestry practice.	
37.	<b>Do you agree that the common framework should continue to align with the biodiversity and ecosystem requirements set out in the Timber Standard? Please provide evidence to support your response.</b>
Yes, but the requirements for forest management in the Timber Standard seem to be quite different to those required for agricultural management - they should be standardised (where possible) around a set of good land management principles. Further guidance on the due diligence required would be beneficial.	
38.	<b>Are there any areas where government should go further than the existing requirements? How should these requirements be included?</b>
Clarify trees outside forests (TOF); require auditor/agent competence and approvals; tighten guidance for due diligence.	
39.	<b>Do you agree that the common framework maintains the existing social requirements in current criteria? Please provide evidence to support your response.</b>
Yes, but the common framework needs to be applicable to ALL land management with UK specific guidance for proportional verification.	
40.	<b>Should the common framework require forest managers to uphold the high-level principles running through the fundamental ILO Conventions? Please provide evidence to support your response.</b>
No, this requirement could have the unintended consequences of further widening the gap between forestry and farming - it should apply to all land managers.	
41.	<b>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? Please provide evidence to support your response.</b>
No more than through existing UKFS compliant management plan consultation and proportionate criteria for non-certified woodlands and certified woodlands.-certified woodlands.	

<p>This would be almost impossible to comply with and to audit. To require “management AND harvesting” to have a positive impact will heavily restrict most forestry harvesting and timber haulage. Again, these requirements need to apply to ALL land management.</p>
<p><b>42. 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.</b></p>
<p>No, none beyond consistent worker safety and grievance mechanisms embedded in forest certification norms. Again, these requirements need to apply to ALL land management</p>
<p><b>43. Do you agree that requirements relating to productivity are sufficiently addressed in existing criteria? Please provide evidence to support your response.</b></p>
<p>Yes, in UK via the UKFS; clarify due diligence expectations for imports.</p>
<p><b>44. Do you agree that the forest criteria should explicitly prevent forest-derived biomass from being sourced from areas that would be permanently deforested? Please provide evidence to support your response.</b></p>
<p>Yes, in addition, TOF must also be provided for. Overall, the removal of trees from the urban or farm environments has significant landscape and community impact. TOF guidance must be provided to ensure it is not open to individual interpretation and provide clarity.</p>
<p><b>45. Do you agree with the definition of deforestation given above? If not, please explain why and provide an alternative definition.</b></p>
<p>Yes, with explicit coverage of TOF where relevant.</p>
<p><b>46. Do you agree there should be an explicit requirement for long-term forest carbon stocks to be maintained? What timescale should this assessment consider? Please provide evidence to support your response.</b></p>
<p>No, these regulations and requirements could make management of small areas of woodland more expensive and bureaucratic - we already have major problems with under managed native woodlands.</p>
<p><b>47. How could the assessment area be defined and determined? When should non-harvestable forests be included or excluded from the area assessment?</b></p>
<p>Support for landscape-scale assessment, reflecting natural variation and practicality for small woodland owners. Government should avoid requiring stand-level reporting.</p>
<p><b>48. 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.)</b></p>
<p>Allow for sanitary fellings, windthrow, fire with documented recovery plans and review at management plan intervals.</p>
<p><b>49. Should government set requirements relating to management changes? How could these be monitored and what should these requirements cover? Please provide evidence, rationale and discuss any risks of this approach.</b></p>
<p>No, the UK risk is very low.</p>

50.	<b>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?</b>
<p>National Forest Inventory trends, import risk assessments, and trade/price data.</p> <p>Generally, in the UK management of neglected woodlands produces timber that is not useful in terms of saw logs. This timber has a few other competing uses such as panel boards but generally hardwood isn't used for panel boards. This may change if other uses are found and should be monitored by Forestry Commission or Forest Research.</p>	
51.	<b>Do you agree that forest biomass should not be sourced from the prohibited land categories proposed? Please provide evidence to support your response.</b>
<p>Agree. Provide benchmarking to recognised schemes and expectations for non-certified due diligence and certified due diligence.-certified due diligence.</p>	
52.	<b>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? If yes, what evidence should be required to demonstrate compliance?</b>
<p>Yes, with official notices (e.g., SPHNs) and biosecurity (heat treatment/pelletisation) where needed. As already noted, many UK forests are established on shallow peats and should be UKFS compliant.</p>	
53.	<b>Do you agree that roots should be an ineligible feedstock? Please provide evidence to support your response.</b>
<p>Generally, yes; exceptions only where disease control requires removal with documented risk management.</p>	
54.	<b>Should the sustainability criteria allow for certain circumstances where roots can be used for bioenergy? If yes, please state what circumstances these might be and how they can be evidenced.</b>
<p>Yes, roots with certain insect pests, i.e. hylobius, can be harvested. Documented phytosanitary necessity and permitted treatment routes are the evidence needed.</p>	
55.	<b>Do you agree with the proposed specification of sawlogs? If not, please explain why and provide an alternative definition.</b>
<p>Accept with clarification on species/mill access and whether all or any criteria must be met.</p> <p>What is the evidence that this is a significant problem in the UK? Again, it creates further beauracatic burdens for small woodland owners, forestry contractors and sawmills. The value of a sawlog versus bar material also depends on currency exchanges, local markets and construction. The proposal as it stands is unhelpful and unauditable.</p> <p>There is also an issue with co-product and sawmill residue - how much of a sawlog needs to be converted to timber for the co-product to meet "cascading" use principles? What if a load of sawlogs is delivered to the sawmill and then rejected on quality - too bent, too old, wrong species etc., this could be hundreds of tonnes per month in a large mill?</p>	
56.	<b>Should sawlogs be prevented from use in bioenergy? Please provide evidence to support your response.</b>

<p>Yes, in principle; economics already discourage; include small tolerance to avoid penalising mixed operational loads.</p> <p>Economically they won't be used. As above in question 55.</p>
<p><b>57. If sawlogs are prevented from use in bioenergy, should a small margin of tolerance be introduced? If yes, what should the margin of tolerance be set at? Please provide evidence to support your response.</b></p>
<p>Yes, small, evidence based (e.g., nearest suitable mill constraints).</p> <p>As above in question 55/56.</p>
<p><b>58. Beyond the above 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.</b></p>
<p>Apply across all woody biomass, with practicality tests for regional market access and avoid undue admin burden.</p>
<p><b>59. Should the cascading use principle only apply to forest-derived biomass, or all woody biomass? Please provide evidence to support your response.</b></p>
<p>No, the timber supply chain is already under severe pressure. This will further increase costs and drive small operators out of business.</p>
<p><b>60. 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? Please provide evidence to support your response.</b></p>
<p>Yes, with the caveat that support is only provided for bioenergy from feedstocks that meet the land management criteria. This would create a level playing field for all bioenergy crops.</p>
<p><b>61. Considering the forest criteria in the round, are there any other criteria that should be included to ensure forest biomass is low carbon?</b></p>
<p>Emphasise landscape scale carbon and efficient end use (CHP preference aligns with RED III). Note that a small woodland owner may not be able to demonstrate landscape scale carbon.</p>
<p><b>62. Do you agree with the feedstocks that are in scope? If not, please explain which feedstocks should be in or out of scope of the forest criteria, and provide evidence to support your response.</b></p>
<p>Yes, set clear tests for when waste wood is "waste" vs "residue"; retain "deemed sustainable" clarity for habitat restoration/arb arisings under controlled conditions.</p> <p>Woody biomass from SRC is an agricultural crop and should be treated as such.</p> <p>Sawmill residues should be classified as co-products.</p> <p>UK origin: Ensure that coppice within a woodland situation (traditional coppice) is defined as part of forestry operations – note this is not covered by a felling licence (below minimum dbh for felling licence requirements) in the UK and therefore evidence may be difficult to collect. Coppice within a woodland, if managed in a traditional way and protected from deer during the regrowth phase, is sustainable and a small low impact management of forests (SLIMF). This is important to many small woodland owners who may wish to sell to small operators.</p>

<p><b>63. What are the challenges with applying the forest carbon stocks criterion to secondary feedstocks (e.g. sawmill residues)? How could these be overcome?</b></p>
<p>Provenance aggregation complicates origin transparency; rely on UKTR due diligence and SBP/CoC mass balance as appropriate.</p> <p>UK sawmills: A supplier must be able to assume the sawmill co-products are legal as they must comply with UKTR. To prove origin of the co-product is more difficult as they will come from a variety of sources which the sawmill may or may not wish to divulge or have the inclination to do so for the low value co-product. Their income is on saw logs entering the mill and the income from the co-products is an addition but at a lower value. Not all sawmills are certified FSC/PEFC or even if they are they won't have sufficient certified sawlogs entering their supply chain to certify all their products.</p>
<p><b>64. Are there challenges with applying the prohibited land categories to secondary feedstocks (such as sawmill residues)? If yes, please identify these challenges and suggest how they could be overcome (e.g. through the use of appropriate proxies).</b></p>
<p>Low risk in UK; for imports use country/region risk and due diligence at the primary processor/pellet plant.</p>
<p><b>65. Do you have any additional views on secondary feedstocks (such as sawmill residues) that have not been captured by questions above? For example, consider risks associated with misalignment with other international sustainability criteria (e.g. EU RED III).</b></p>
<p>Clarify contamination thresholds for secondary processing residues; no contamination unless under permit; additional fossil fuel use recorded.</p> <p>When sawmill co-products are mixed with secondary processing residues and potential contamination during the secondary process. There needs to be clarity on what is primary (sawmill) co-products and secondary processing residues and an understanding of what contamination is acceptable and what isn't. In the RHI regs it states that up to 10% contamination with fossil fuels was acceptable, but many took it to mean that 10% contamination with anything. Additional fossil fuel use must be recorded and must not be more than 10%.</p>
<p><b>66. Should short rotation forestry (SRF) have to comply with the productivity criterion, forest carbon criterion, or deforestation criterion? If not, what should the cut-off age of the trees harvested be for the exemption? Please provide evidence to support your response.</b></p>
<p>Treat SRF as agricultural when planted/managed as such; avoid duplicative forest criteria.</p>
<p><b>67. Should the types of evidence for demonstrating compliance with forest criteria be kept aligned with existing criteria? If not, please outline what changes should be made.</b></p>
<p>Yes, keep Category A (FSC/PEFC) and Category B RBRA routes with improved guidance.</p> <p>UK sourced biomass – use of RBRA and felling licences to demonstrate sustainability needs to be maintained. Use of UKTR due diligence alongside this ensures that timber used for biomass.</p>
<p><b>68. Please highlight any specific cost implications to your business/sector in meeting the proposed forest criteria. Please provide evidence to support your response.</b></p>

Costs reduced by alignment with UKTR/EUDR methods and existing certification; avoid extra bespoke requirements.

Use and align with UKTR and the due diligence required. This makes a level playing field and ensures that the wood used for biomass does not require more of an administrative burden on the industry. It will strengthen the understanding of UKTR, and this can be adapted as UKTR changes with the implementation of EUDR.

**69. 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).**

Allow sufficient lead time; benchmark to international schemes (/PEFC/FSC) and ensure cross sector coherence (e.g., SAF).

Certification schemes should update their criteria on a regular basis as part of internationally recognised standards. Sufficient time should be allowed between any changes in the requirements to allow the certification schemes to complete their standard review cycle. Note: if there is divergence from UK requirements to internationally recognised standards that do not align it will be difficult for the UK to adapt. Benchmarking of schemes against any standard should be done and routinely reviewed. If SAF requirements are different to this biomass strategy, it will distort the market and could mean that biomass not acceptable under one requirement is diverted to another that is potentially perceived as an easier route to compliance. Close alignment between requirements for alternative uses will mean the forestry industry is required to maintain one set of evidence and allows for clear end use alignment within the cascading principle. Liaise with FC, OPSS and established certification bodies to ensure this.

**70. Do you agree that, unless otherwise stated, wastes and residues should be exempt from the land criteria? Please provide evidence to support your response.**

Only if demonstrably waste under permitting; sawmill co-products need legality/traceability; secondary residues require contamination controls.

Sawmill residues are a co-product not a waste. Traceability on sawmill co-products must have a risk assessment and understanding of the origin of the timber as a minimum if it is to be exempt. Alignment of UKTR and EUDR would allow for this.

Secondary processing residues may contain contaminants and are therefore a waste and should be permitted to be used by the appropriate environmental authority. Traceability on secondary processing residues must have a risk assessment and understanding of the origin of the timber as a minimum if it is to be exempt. Alignment of UKTR and EUDR would allow for this.

Waste may contain contaminants and should be appropriately permitted to be used. Traceability on this feedstock would be incredibly difficult.

**71. Do you have evidence that wastes are being purposefully created to produce feedstocks for bioenergy? If yes, please provide that evidence.**

No direct evidence, but confusion exists; publish definitions and conformity examples.

BSL audits often find that suppliers do not have appropriate permits if using waste wood or have declared it is a waste when in fact it is a processing residue or even hedge trimmings or arboricultural arisings. Alignment with internationally recognised definitions is required to

<p>ensure that there is clear understanding across the sector. For example, arboricultural arisings according to the Environment Agency are a waste (so that is what a supplier says it is) but deemed sustainable by the TSHE. Does this mean they need a waste permit/exemption to burn it or is it considered virgin material.</p>
<p><b>72. Are there any emerging or novel biomass feedstocks for which sustainability criteria may need to be developed? If yes, please specify the feedstocks and suggest criteria that would mitigate potential environmental harms arising from the sourcing of the feedstock.</b></p>
<p>Biocarbon and biochar are part of any future for biomass. It should be forward facing sufficiently to consider developments in these fields. The 5-year review will increase the ability to keep pace with these and other developments in the sector.</p>
<p><b>73. How would the land criteria, as currently formulated, be applied to biomass feedstocks regardless of their end use (including non-energy uses)?</b></p>
<p>Yes, via benchmarking to internationally recognised schemes across the lifecycle.</p> <p>Aligning/benchmarking with internationally recognised certification schemes and sustainability standards would be key here. They should include the whole lifecycle from growing to end use as part of the sustainability analysis including any impacts at the point of use.</p>
<p><b>74. Would the land criteria need to be adapted to mitigate potential negative environmental impacts associated with non-energy uses of biomass? Please provide evidence to support your response.</b></p>
<p>Keep principles consistent; add sectoral annexes if material risks differ. The land criteria should align with internationally recognised sustainability standards.</p>
<p><b>75. 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?</b></p>
<p>Align with UKTR/EUDR due diligence models; use risk-based proportionality.</p> <p>Alignment/benchmarking with recognised certification schemes and internationally recognised sustainability standards. Use of UKTR and existing schemes, due diligence and risk assessments throughout the woody biomass sector.</p>
<p><b>76. 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.</b></p>
<p>Pellet chain complexity (mixing; multiple species/origins); importance of chain of custody and due diligence.</p> <p>Most biomass supply chains are short and as such are simple to trace back to the origin. Pellets are the main exception. These are readily produced and traded internationally. An understanding of the impact and a reliance on the audit and supply chain being held to the highest standards is more difficult. However, for higher grade pellets the frequency with which they are handled and how they are handled degrades the pellets and so more care must be taken.</p> <p>Pellets are an agglomeration of small particles of wood often from around five different species gathered from several miles from the pellet plant. If the pellet plant has a sawmill attached to</p>

it/close by, most of the feedstock can come from this. This feedstock is a co-product of the sawmill. The origin of this feedstock depends on the logs going into the sawmill and these can be transported many miles. Testing of pellets for origin would be prohibitively expensive for each shipment but could be done on an ad hoc basis. Due diligence on the sawmill and sawmill co-product should take origin into account.

**77. 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? Please provide detailed evidence on what measures these could be and how they could be implemented, noting any challenges.**

A cross-sector core with sector annexes where risk profiles differ (e.g., largescale power vs. heat).

#### Chapter 4 – GHG Criteria: Pages 76 to 89

**78. Do you agree that the proposed life cycle parameters can be used to give an appropriate representation of the bioenergy LCA emissions? Please provide evidence to support your response.**

Yes, retain full LCA with periodic updates.

An LCA approach is desirable. Any approach defined by the criteria as described should keep pace with developments over the years and the 5-year cycle should allow adaptation and to follow this.

**79. Are there additional parameters that should be considered? Please provide evidence to support your response.**

Monitor BECCS/CCUS method developments without overstating credits; align to ISO style LCA practice.

**80. Do you agree with the approach on system boundary application? Please provide evidence to support your response, including sector-specific impacts where possible.**

Whole chain by default; justify any boundary reduction transparently.

When assessing the emissions from biomass, it is essential to evaluate the entire life cycle, from cultivation through to final use, because combustion still produces emissions and cannot be considered fully “clean.” In contrast, for hydrogen, most emissions arise during production, while end use emissions are minimal since hydrogen combustion produces only water. This provides a logical basis for setting system boundaries differently, but consistent rules are still needed.

If, in typical scenarios, more than 95% of lifecycle emissions arise during production, with feedstock origin, transport and end use contributing the remaining ~5%, then setting boundaries around production alone may be justified. However, this assumption must hold across all cases, and the market should be reviewed as part of the five-year standard cycle. For example, if biomass is imported from distant locations such as New Zealand, or if feedstock cultivation becomes more carbon intensive, or appliances are poorly matched to the fuel, these factors could push emissions beyond the 5% threshold and would need to be reconsidered.

**81. 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? Please provide evidence to support your response.**

	Yes, separate from core GHG accounting; use consistent government coefficients when available.
<b>82.</b>	<b>How could the GHG criteria life cycle assessment be expanded to include accurate ILUC emissions in the future? Please provide evidence to support your response.</b>
	When robust, internationally aligned factors exist; review at 5-year updates. year updates. -year updates.
<b>83.</b>	<b>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? Please provide evidence to support your response.</b>
	Yes, if aligned to EU/ISO methodologies to avoid market fragmentation.
<b>84.</b>	<b>Are there other ways in which ILUC could be addressed within the common biomass sustainability framework? Please provide evidence to support your response.</b>
	No comment.
<b>85.</b>	<b>What could be done to further improve data collection and monitoring of soil carbon accounting?</b>
	Replace/modernise B2C2, enable auditable imports/exports, publish default values with uncertainty.
<b>86.</b>	<b>What other considerations should be made when defining or updating default values in line with the common framework GHG life cycle parameters?</b>
	Maintain international compatibility (RED/ISO) and version control.
<b>87.</b>	<b>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? Please provide evidence to support your response.</b>
	Yes, sector specific thresholds reflect different pathways and technologies.
<b>88.</b>	<b>Do you agree with the proposed considerations in determining appropriate thresholds, and that these can achieve meaningful decarbonisation across different bioenergy sectors? Are there other key considerations that should be factored in? Please provide evidence to support your response.</b>
	Yes, provided thresholds are tightened over time with evidence.
<b>89.</b>	<b>Are there alternative ways to set a threshold for bioenergy pathways? If yes, please explain how this could be achieved.</b>
	No comment.
<b>90.</b>	<b>Do 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.</b>
	Yes, with clear rules for mixed wastes and documentation of processing steps post “point of waste.”
<b>91.</b>	<b>What are the barriers and challenges (if any) in accounting for GHG emissions from wastes, including mixed wastes?</b>
	Establish the first point of waste and include any subsequent processing in LCA.

<b>92. Should the methods for reporting greenhouse gas (GHG) emissions savings be kept in line with existing criteria? If not, please outline what changes should be made.</b>
Yes, maintain continuity with RED style LCA.
<b>93. Please highlight any specific cost implications to your business/sector in meeting the proposed GHG criteria. Please provide evidence to support your response.</b>
One-off tool updates; then reduced admin through consistent data structures.
<b>94. How can life cycle GHG emissions from non-energy uses of biomass best be calculated, taking account of any methodological challenges?</b>
Define clear functional units and system boundaries by product class; adopt ISO aligned methods.
<b>95. At what points in the material life cycle is it most feasible to collect data on GHG emissions for non-fuel uses of biomass?</b>
At production gate if promoting production; at use phase if promoting substitution/use.
<b>96. 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?</b>
gCO <sub>2</sub> e/tonne at a particular moisture content for allows comparison.
<b>97. Do you believe that there exists a sufficient evidence base to set default values of biomass sustainability for non-energy uses?</b>
In some cases, but variability warrants conservative defaults and periodic review.

<b>Chapter 5 – Monitoring Reporting and Verification: Pages 90 to 112</b>	
<b>98. Do you agree that biomass feedstock definitions need to be harmonised across end-use sectors? If biomass feedstock definitions should be harmonised, how broad or granular should these categories or definitions be? Please provide examples.</b>	
Yes. Use FC/TSHE/BSL terminology.	
<b>99. Are there any other improvements to the feedstock-type reporting process that should be considered?</b>	
Standardise minimum dataset (origin region, feedstock class, mass/energy, moisture, %Cat A/B, GHG). This should not be a burden or cost, on the supplier.	
<b>100. Do you agree that biomass feedstock country-of-origin reporting should be mandatory, with certain exemptions? Please provide evidence to support your response.</b>	
Yes, allow sampling based verification for mixed pellet consignments.	
<b>101. Which feedstocks (if any) should be exempt from country-of-origin reporting? Please provide evidence to support your response.</b>	
None for woody biomass due to global illegality risks; keep proportionate verification.	

<p><b>102. Do you agree there should be a list of minimum sustainability metrics that are collected and reported to the relevant delivery body? Please explain your answer, including examples of sustainability metrics that could be included.</b></p>
<p>Origin, volume/energy, moisture, %Category A/B, GHG intensity, and (for operators) useful energy output. However, more esoteric data could and should be obtained from external (academic, governmental) sources.</p>
<p><b>103. How should this be achieved in practice?</b></p>
<p>Via BSL portals and scheme MIS integrations, with API options for large operators.</p>
<p><b>104. What potential barriers or challenges, including cost implications, need to be overcome to achieve standardisation of reporting?</b></p>
<p>Primarily tooling and training; mitigated by templates and calculator upgrade.</p>
<p><b>105. Do you agree with the above proposal on publishing relevant sustainability data? Please provide evidence to support your response.</b></p>
<p>Yes, publish aggregated, anonymised data to build trust.</p>
<p><b>106. 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.</b></p>
<p>Origin (country/region), feedstock class, %certified, GHG intensity, and end use efficiency.</p>
<p><b>107. Are there any data points that should not be included? Please provide evidence to support your response.</b></p>
<p>Exclude commercially sensitive pricing, protect identities in small markets.</p>
<p><b>108. Overall, do you agree that there should be a risk-assessed approach to carrying out third-party audits? Please provide evidence to support your response.</b></p>
<p>Yes. Frequency/assurance level reflect risk, volume, and past performance.</p>
<p><b>109. Do you agree the risk assessment should determine whether a 'reasonable' or 'limited' assurance audit needs to be carried out? Please provide evidence to support your response.</b></p>
<p>Yes, referencing ISAE 3000 (Revised) concepts.</p>
<p><b>110. Do you agree the risk assessment should determine the frequency of auditing? Please provide evidence to support your response.</b></p>
<p>Yes, with minimum entry audit then risk-based cycles.</p>
<p><b>111. 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.</b></p>
<p>Reasonable audits occupy two to three man days in preparation and execution while limited audits are one man day. This assumes the auditor is competent and familiar with the process and products being audited.</p>
<p><b>112. What effect would the requirement of reasonable assurance have on government incentive scheme participants? Please provide evidence to support your response.</b></p>

The requirements for audits must be based on the track record of the organisation being audited. There is a good case for skilled and accustomed auditors familiar with the operators within their area who are empowered to determine the frequency and intensity of each audit. To deter unprofessional practices the minimum amount of notice should be given for each audit. The variable annual workload of processors must be born in mind.

There would be no benefit as the evidence to date does not show any significant action being taken against those who deliberately flout regulations.

**113. Do you agree that benchmarking exercises for voluntary certification schemes should be at intervals no greater than five years? Please provide evidence to support your response.**

Yes, to track RED III/EUDR/UK updates.

**114. Do you agree that VCSs should be required to disclose the following measures as part of the benchmarking process? Please provide evidence to support your response.**

Yes, to protect independence and quality; require auditor rotation.

**a. What quality control framework the auditor has in place, and how the operator has confirmed that the quality control framework is sufficient to ensure that the ISAE3000 auditor can issue a reliable opinion.**

No comment.

**b. The competence and qualifications of the individuals delivering each assessment, including the amount of required professional development hours undertaken by auditors to maintain necessary skills.**

No comment.

**c. Specific details on the level of scrutiny and detail involved in the decision-making process to issue a certificate to any operator.**

No comment.

**d. How long an auditor has been working with each operator they audit.**

This is key to impartiality. ISO/IEC 17021-1:2015 – Requirements for Bodies Providing Audit and Certification of Management Systems requires certification bodies to ensure impartiality and manage threats such as self-interest, self-review, and familiarity. Whilst it does not mandate rotation, it supports the principle that long-term relationships can impair independence. However, the advantage of an auditor knowing an area and its operators is in detecting changes in practices, both bad and good, as well as learning where more scrutiny may be required.

**115. 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? Please provide evidence to support your response.**

Yes, ISO/IEC 17021-1:2015 – Requirements for Bodies Providing Audit and Certification of Management Systems requires certification bodies to ensure impartiality and manage threats such as self-interest, self-review, and familiarity.

**116. 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? Please provide evidence to support your response.**

<p>Yes, align with impartiality principles (no advisory/audit overlap). ISO/IEC 17021-1:2015 – Requirements for Bodies Providing Audit and Certification of Management Systems requires certification bodies to ensure impartiality and manage threats such as self-interest, self-review, and familiarity. Whilst it does not mandate rotation, it supports the principle that long-term relationships can impair independence.</p>
<p><b>117. What challenges and barriers to achieving this are you aware of? (For example, are there specific feasibility or cost concerns with overseas site visits?)</b></p>
<p>Cost/availability; use pooled auditor registers and remote techniques where appropriate.</p>
<p><b>118. What benefits do you see this providing to the monitoring and assurance of biomass sustainability?</b></p>
<p>Reduces bias risk, improves market confidence and comparability.</p>
<p><b>119. Should incentive schemes have the ability to request data relating to biomass sustainability from anybody involved in the certification, auditing and evidence generation process? Please provide evidence to support your response.</b></p>
<p>Yes, with confidentiality safeguards.</p>
<p><b>120. Should incentive schemes have the ability to require participants to include data-sharing provisions in contractual agreements with third parties? Please provide evidence to support your response.</b></p>
<p>Yes, standard contractual clauses.</p>
<p><b>121. What barriers (including costs) are there to implementing data sharing as described above?</b></p>
<p>Systems integration and privacy; mitigated with templates and secure portals.</p>
<p><b>122. Do you have any additional views on current MRV practices that have not been captured by questions above?</b></p>
<p>Prioritise interoperable data standards and common IDs across schemes.</p>
<p><b>123. Please provide any suggestions for strengthening MRV practices that are not outlined above, including as much detail as possible.</b></p>
<p>Upgrade calculator; API enabled reporting; publish an MRV handbook with examples.</p>
<p><b>124. Do you agree with the outlined enforcement guiding principles? Please provide evidence to support your response.</b></p>
<p>Yes, risk based, proportionate, transparent.</p>
<p><b>125. 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.</b></p>
<p>Yes, where proportionate and subject to appeal.</p>
<p><b>126. 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 an independent auditor)?</b></p>
<p>First tier tribunal or independent arbiter, with published criteria.-tier tribunal</p>
<p><b>Conclusion: Pages 112 to 113</b></p>

**127. 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?**

Need for international alignment (RED III/EUDR), updated GHG tooling, and SME friendly MRV to maintain competitiveness and credibility.

**128. 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?**

- Anchor legality/sustainability in UKFS/TSHE/UKTR,
- Align with RED III/EUDR to avoid trade frictions,
- Leverage BSL for phased delivery and training, and
- Implement risk based ISAE 3000 assurance.