



Guidance for the use of pellet certification within SDE+

*Guidance for biomass economic operators
and conformity assessment bodies*

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1 Introduction

The SDE+ scheme includes sustainability requirements for a number of large installations using pellets, for example for co-firing in coal-fired power stations and for industrial steam production [2].

Energy producers have several options for demonstrating that the biomass used by them meets these sustainability requirements. They can buy biomass certified according to an approved certification scheme, they can arrange for verification to be conducted as part of the biomass supply chain, or they can use a combination of these methods. The key is that each biomass consignment must be shown to comply with all sustainability requirements.

This Guidance aims to provide parties with guidance on the correct use of certification within SDE+. The guide is primarily aimed at energy producers, economic operators in the biomass supply chain and conformity assessment bodies (CABs). In this context, CABs refer to parties that carry out certification audits for approved certification schemes, conduct verification audits of biomass consignments or audit the conformity year statement (CYS) for energy producers.

This Guidance only discusses the role of verification indirectly, and only in relation to certification (where verification is conducted instead of or in addition to certification). This Guidance does not discuss the substantive requirements or method of verification. These are laid down in the *Verification Protocol for Sustainable Biomass for Energy Applications* [2].

Further information on certification within SDE+ can be found in two other guidance documents published by the Netherlands Enterprise Agency – the *Guidance on the classification of biomass* [3] and the *Guidance Chain of Custody* [4].

This document discusses the following in turn:

- Determining the appropriate biomass category. This is important because SDE+ uses five approved categories of biomass, which are subject to different sustainability requirements. Moreover, not all certification schemes are approved for each biomass category (Chapter 2);
- Explanation of the conditions and rules that apply when an energy producer wishes to use a certification scheme approved by the Dutch government to demonstrate compliance with the Dutch legal sustainability requirements (Chapter 3);
- A checklist that helps energy producers to apply approved certification schemes and claims in the correct manner when demonstrating the sustainability of individual biomass consignments (Chapter 4).

Chapters 2 and 3 explain the system for using certification within the SDE+ scheme. The checklist in Chapter 4 goes on to provide guidance on the application by economic operators and CABs in practice.

Please note: This guide discusses certification in relation to the sustainability requirements that have been laid down for specific categories of solid biomass in the *Decree and Regulation on Conformity Assessment of Solid Biomass for Energy Applications* [1]. Sustainability requirements and/or certification of biomass under the recast Renewable Energy Directive are beyond the scope of this guidance document.

2 Biomass categories and sustainability requirements

2.1 General

The *Decree on the Conformity Assessment of Solid Biomass for Energy Applications* [1] specifies five categories of biomass, each of which is subject to different sustainability requirements:

- Category 1: Woody biomass from Forest Management Units;
- Category 2: Woody biomass from small Forest Management Units (FMU <500 hectares);
- Category 3: Residues from nature and landscape management;
- Category 4: Agricultural residues;
- Category 5: Biogenic residues and waste flows.

The sustainability requirements applicable to these categories are set out in the *Regulation on the Conformity Assessment of Solid Biomass for Energy Applications (Regeling conformiteitsbeoordeling vaste biomassa voor energietoepassingen)* accompanying the *Decree on the Conformity Assessment of Solid Biomass for Energy Applications (Besluit conformiteitsbeoordeling vaste biomassa voor energietoepassingen)* [1]. Table 2.1 summarises the sustainability requirements for each biomass category:

Table 2.1 Sustainability requirements per biomass category

	Greenhouse gas emissions ¹	Soil management	Carbon and land use change	Sustainable Forest Management (SFM)	Chain of Custody
1. Woody biomass from Forest Management Units	1.1		3.1-3.3 4.1-4.3 5.1	6.1-6.3 7.1-7.5 8.1-8.8 9.1-9.2 10.1-10.5 11.1-11.2	12.1-12.6 13.1-13.3
2. Woody biomass from small Forest Management Units (FMU <500 hectares)	1.1		3.1-3.3 4.1-4.3	6.1-6.3 7.1-7.5 8.1-8.8 9.1-9.2 10.1-10.5 11.1-11.2	12.1-12.6 13.1-13.3
3. Residues from nature and landscape management	1.1	2.1			12.1-12.5 13.1-13.3
4. Agricultural residues	1.1	2.1			12.1-12.5 13.1-13.3
5. Biogenic residues and waste flows	1.1				12.1-12.5 13.1-13.3

¹ Sustainability requirement 1.1 has two parts. A requirement for each consignment and a requirement for an average annual reduction in greenhouse gas emissions. Certification can only serve to determine whether the first part of the requirement has been met. Moreover, this can only be established at the level of the energy producer (and not at earlier stages in the supply chain).

The biomass category must be established for each biomass consignment, since it is the category that determines which sustainability requirements apply to the consignment. Once the biomass category of a consignment is known, it is possible to determine which sustainability information must be made available.

The Guidance on the classification of biomass [3] provides further information on the five biomass categories and offers advice on how to determine the correct category. Section 2.2 addresses the question of which party should determine the biomass category and at what point in time..

2.2 Determining and verifying the biomass category

The determination and verification of the biomass category must take place at the first link in the biomass chain, because the category determines which sustainability requirements the biomass must meet. The first link may be the forest management unit or the First Collecting Point (see the Guidance Chain of Custody [4]). The company forming the first link in the chain will determine the biomass category. This is verified by the CAB for the certification scheme according to which the first link in the chain has been certified. In the case of ex-post verification, this is done by the CAB conducting the verification.

In practice, the following situations may arise:

1. If the certification scheme according to which the first link has been certified is approved for requirement 12.4, the CAB will check during the annual audit whether the first link has correctly determined the biomass category/categories of consignments. In this case, the certificate provides a guarantee that the biomass category of individual consignments has been correctly determined.

If the first link and the other parties in the supply chain then use the same certification scheme – a scheme approved for requirement 12.4 – the information about the biomass category can be passed on correctly along the supply chain via the chain of custody system. CABs that certify economic operators further down the supply chain will also verify this with these parties. The certificate provides a guarantee that the information regarding the biomass category is correctly passed on along the chain.

Please note: This means that the certification scheme used for the chain of custody requirements in the chain (including requirement 12.4) cannot be different from the certification scheme used for the chain of custody requirements at the first link (see also Chapter 3).

2. In cases where the certification scheme according to which the first link has been certified is not approved for requirement 12.4, the CAB for the scheme according to which the first link was certified will not verify the biomass category. Even in cases where the first link has no certification whatsoever and the sustainability requirements are verified afterwards, the determination of the biomass category is not guaranteed by certification. In other words, the first link determines the category itself and a CAB verifies the biomass category afterwards. All links in the supply chain must then also be verified in order to establish that the information on the biomass category has been correctly passed on along the supply chain. In other words, all parties in the supply chain must be verified against requirement 12.4.

The advantage of the first situation is that, at the time biomass is delivered, the manner in which the first link determines the biomass category has been checked by a CAB for a certification scheme. The certificate provides assurance that the biomass category has been determined correctly.

In the second situation, the biomass category is only determined by means of an ex-post verification. This entails a certain risk, in that the CAB (the verifier) could decide on a different biomass category than the economic operator in the first link. This might mean that more sustainability requirements need to be met than assumed by the biomass supplier (first link), and that additional verification is required with regard to these additional sustainability requirements. Another outcome of this verification could be that the delivery does not meet the additional sustainability requirements, and therefore does not meet the SDE+ requirements.

Example: Approval of biomass category by means of verification

A pellet mill determines that the biomass it processes falls within category 5. The mill is certified according to a certification scheme which covers part of the requirements applicable to category 5 biomass, but not 12.4. This could be the case, for example, if the pellet mill is certified for FSC (only). This does not guarantee that the certification auditor (CAB) checks whether the biomass does in fact come under category 5 as defined in Dutch legislation. This means that biomass consignments from this pellet mill will require ex-post verification in order to establish the applicable biomass category. If the verifier concludes that category 5 does not apply or applies in combination with category 1 or 2 (biomass from forest management), biomass consignments on the basis of the certificate did not comply with all sustainability requirements (this is because the biomass was assumed to be category 5, which does not cover the requirements for sustainable forest management as shown in Table 2.1). These requirements then require additional verification. Moreover, in that case the first link in the biomass chain could be a different party (the forest management unit rather than the pellet mill).

Please note: If the pellet mill used in this example holds both SBP and FSC certification, requirement 12.4 is fulfilled. In this case, the biomass category can be verified by the pellet mill's SBP auditor, and this information can then be passed on along the SBP chain of custody.

The CAB that draws up the conformity year statement verifies with regard to all biomass consignments whether there is proof that the category has been determined correctly, whether the biomass meets the sustainability requirements applicable to that particular category, whether all links in the supply chain comply with the requirements relevant to them and what documents are available to demonstrate this (certificates and/or verification).

3 Use of certification schemes within SDE+

3.1 General: Use restricted to approved certification schemes

Many economic operators apply certification schemes in order to demonstrate that biomass has been sustainably produced and that its use does not lead to undesired sustainability effects or risks. The use of certification schemes is in principle voluntary. Parties choose to have their business operations or raw materials certified because their customers or other stakeholders request or demand this, because they themselves believe this to be important, or for a combination of these reasons. Certification schemes differ in terms of the types of biomass and activities covered, the sustainability requirements that are imposed and the manner in which the sustainability requirements are determined and verified. In summary, certification schemes set their own rules and criteria for what they consider to be “sustainable biomass”.

Under the Dutch system, sustainability requirements are laid down by law for five biomass categories. In other words, it is the Dutch government who determines what is considered sustainable, and this definition of sustainability of biomass is an essential eligibility requirement for SDE+ subsidy.

Under certain conditions, a claim based on a voluntary certification scheme can be used to demonstrate that biomass meets the Dutch sustainability requirements. However, this is only possible if the relevant scheme has been approved by the Minister of Economic Affairs and Climate Policy (EZK), and then only within the scope of that approval. The approval procedure is summarised in the box below.

Approval procedure for certification schemes

The first step in obtaining the Minister’s approval for a certification scheme is to submit a request for approval by sending an email to duurzaamheidvastebiomassa@rvo.nl. This mailbox is managed by the “Sustainable Solid Biomass” team at the Netherlands Enterprise Agency. The request will require submission of all documents deemed relevant by the scheme manager for the assessment of the scheme. The documents that will ultimately form part of an approval are referred to as the scheme documents, all of which together will subsequently constitute the approved scheme. As part of the approval procedure for a new scheme, the Minister may instruct the Netherlands Enterprise Agency to seek an opinion from the independent Advisory Committee on the Sustainability of Biomass for Energy Applications (*Adviescommissie duurzaamheid biomassa voor energietoepassingen*, abbreviated: ADBE) on the extent to which a scheme is able to demonstrate compliance with the sustainability requirements.

The ADBE issues an advice according to an assessment procedure that has been laid down in an assessment protocol (see www.adviescommissiedbe.nl). This protocol ensures the ADBE operates in a transparent manner. At the end of this procedure, the ADBE will issue an opinion to the Minister. On the basis of this advice, the Minister will then issue a decision stating that the certification scheme meets the management and sustainability requirements. The decision will also include a specification at the level of the solid biomass category, indicating which sustainability requirements are covered when the scheme and the associated claim are used. The approval decision, which is published in the Dutch Government Gazette and can also be found on the RVO website, specifically lists the scheme documents that formed the basis for the approval.

Conditions for approval

To qualify for approval, a certification scheme must first meet a number of general requirements. Among other things, these requirements relate to the way in which the scheme is managed, the role played by stakeholders in this and whether there are adequate complaints and appeal procedures. In addition, the scheme must cover one or more of the Dutch sustainability requirements that apply to the five defined biomass categories. This means that the certification scheme must impose sustainability requirements for biomass that are at least equivalent to the legal requirements. The extent to which the sustainability requirements meet this requirement is therefore up to the Minister of Economic Affairs and Climate Policy to decide.

In the approval decision, the Minister of Economic Affairs and Climate Policy will, in respect of each individual biomass category, specify the sustainability requirements for which the relevant certification scheme has been approved. If a certification scheme uses different claims, the specification will be given for each claim of the scheme. In addition, the decision will specify the geographical scope of the approval and the scheme documents to which the approval pertains.

The CABs issuing certifications in accordance with these approved schemes are granted recognition to carry out conformity assessments for approved schemes by way of a separate procedure. Biomass can only be said to meet sustainability requirements if one or more approved certification schemes and one or more accredited CABs that audit all certified chain parties are used.

The following paragraphs discuss in greater detail the various aspects that are relevant to the approval of certification schemes, which are:

- The fact that certification schemes can be approved for some or all of the Dutch sustainability requirements and what this means in practice (section 3.2);
- The nature of the relationship between full or partial approval of a scheme and the claims made in relation to a biomass consignment (section 3.3);
- The geographical scope of approvals of certification schemes (section 3.4);
- The fact that the approval relates to a specific set (version) of the scheme documents (section 3.5);
- The option to fulfil all or part of the sustainability requirements by means of a group certification (section 3.6);
- The Risk Based Approach (section 3.7).
- Finally, section 3.8 discusses the recognition of CABs.

Detailed information on approved certification schemes, recognized CABs and the conformity year statement is available at www.rvo.nl/duurzaamheidseisen [6]. The following paragraphs contain various references to information on this website. It is advisable to read this chapter in conjunction with the website.

3.2 Approval for some or all sustainability requirements

Approval of a certification scheme is carried out at the level of the individual sustainability requirements and the individual biomass categories.

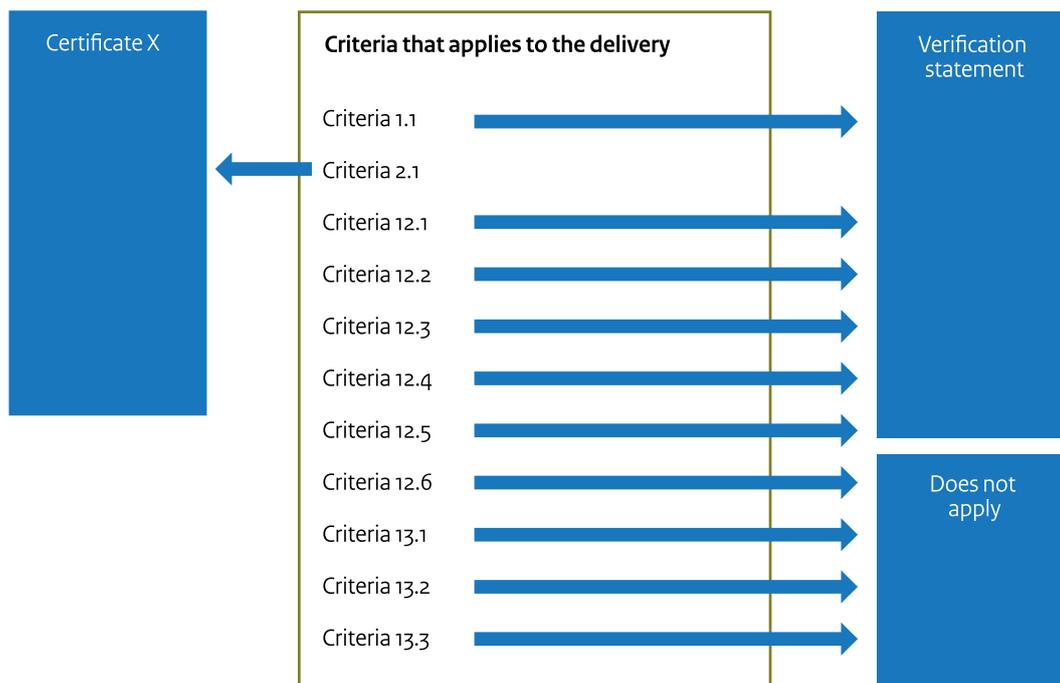
The approval decision individually lists the biomass categories and the sustainability requirements related to that category for which the scheme has been approved (see also the “Approved schemes” section on the RVO website [6]). In other words, a scheme may be approved for some or all of the five biomass categories, and for some or all of the sustainability requirements that apply in respect of each category.

Where a scheme has been approved for all the requirements associated with a biomass category, an approved claim from that scheme may be used by the energy producer to demonstrate that a biomass consignment in that particular category meets all the requirements.

Where a scheme is approved for some of the requirements associated with a biomass category, a claim from that scheme can be used to show that a biomass consignment complies with that part of the requirements. There then remain a number of requirements that have not yet been demonstrated. These are also referred to as gaps. In such cases, there are two ways in which to demonstrate that the remaining requirements are also being met:

1. Use of a second claim in relation to the biomass consignment from a scheme that is approved for the requirements (gaps) not approved for the first scheme. The two certificates together then cover all the requirements.
2. Use of a verification statement for those requirements not covered by the certification claim. In this way, the gaps are covered in retrospect by a verifier who comes to check the specific biomass consignments against the remaining requirements.

At the time the conformity year statement is issued to the energy producer, it will be established for each consignment whether approved certificates and/or appropriate verification statements were issued with regard to all of the requirements.



Relationship between sustainability requirements for the first link and the supply chain

There are a number of sustainability requirements that only apply to the first link in the biomass chain (forest manager or First Collecting Point). The requirements under P12 and P13 apply to all links in the supply chain, including the first link and the energy producer. These chain of custody requirements relate to the controlled forwarding of (sustainability) information through the chain [4].

A certification scheme may have been approved for all requirements for the first link and all requirements for the supply chain. In that case, the relevant scheme can be used for the entire supply chain, including the first link. Where a certification scheme has not been approved for all of the relevant sustainability requirements – i.e. it has not been approved for all requirements that apply to the first link and/or the supply chain – it will be necessary to use at least two schemes used alongside each other or apply verification.

This can give rise to the following situations:

1. The certification scheme does not cover all requirements for the first link, but does cover all chain of custody requirements. This means that at the first link there is a gap for one or more requirements. There are two ways to close this gap:
 - a. Using another (second) certification scheme to cover the requirements that are not covered. The claim associated with this certificate is then passed on through the supply chain via the chain of custody system of the first certification scheme. This can be done if the first scheme “endorses” the second scheme. This endorsement is subject to the condition that, at the end of the chain, it must be clear which claims based on which certificates have been used to meet the sustainability requirements applicable to the first link (see also section 3.3).
 - b. Carrying out verification of the first link in order to verify the requirements that are not covered.
2. The certification scheme covers all requirements for the first link, with the exception of one or more chain of custody requirements (under P12 and P13). There are two ways to close this gap:
 - a. Using another (second) certification scheme to cover the chain of custody requirements that are not covered by the first scheme. This second scheme is then used to pass sustainability information along the supply chain, thus covering the chain of custody. The claim belonging to the (first) scheme that was used for the first link is part of the sustainability information. This can be done if the second scheme “endorses” the first scheme. This endorsement is subject to the condition that, at the end of the chain, it must be clear which claims based on which certificates have been used to meet the sustainability requirements applicable to the first link (see also section 3.3).

Please note: Where chain of custody requirements P12 and P13 are concerned, only one certification scheme may be used and this scheme must be the same for all links in the chain (including the first link). This means that the previously mentioned second scheme can only be used if it has been approved for all chain of custody requirements and if all links in the supply chain have been certified according to that scheme.

- b. Using verification to check the gap in the chain of custody requirements. Given that the chain of custody requirements apply to all links in the supply chain, including the first one, verification should take place at each and every link.

Please note: Where chain of custody requirements P12 and P13 are concerned, only one certification scheme may be used and this scheme must be the same for all links in the chain (including the first link).

Where a certification scheme does not provide full coverage for neither the requirements for the first link nor the requirements for the chain of custody, the gaps must be closed applying the principles as in (1) and (2) above.

3.3 Relationship between the approval of scheme requirements and the claim under a scheme

Certification schemes use claims to indicate that an economic operator or a biomass consignment meets the requirements of the scheme. Examples of claims include “FSC 100%” or “Better Biomass Certified”.

When a biomass consignment is accompanied by a claim from a certification scheme, this means that the biomass meets the Dutch sustainability requirements for which that certification scheme has been approved. This may be for some or all of the requirements. A claim from a certification scheme therefore does not automatically mean that all Dutch sustainability requirements have been met.

Example: GGL is approved for all sustainability requirements, but the claim “GGL controlled” does not confirm compliance with all Dutch sustainability requirements. The claim “GGL controlled” indicates compliance with the Dutch sustainability requirements for which that claim has been approved.

A single scheme covering all requirements

Where a single certification scheme is used to cover both the requirements for the first link and those for the supply chain, use will be made of a single claim.

Examples:

- GGL has been approved for biomass categories 1-5, along with all forest management requirements, carbon requirements and chain of custody requirements. This means that a biomass consignment with the claim “GGL certified” meets all sustainability requirements (and a consignment with the claim “GGL controlled” meets all sustainability requirements for controlled biomass).
- This also applies to Better Biomass and the claim “Better Biomass Certified”. This is subject to an additional condition that the Better Biomass ILUC module must be used to demonstrate that requirement 5.1 has been met.
- It is also possible to cover all sustainability requirements using an ISCC certificate, provided that this certificate bears the claim “ISCC solid biomass NL compliant” in relation to the forest management requirements and the carbon requirements. This certificate has been specially developed by ISCC to meet the Dutch sustainability requirements. Other ISCC certificates and claims, such as “ISCC-EU” and “ISCC-DE”, have not been approved and therefore cannot be used to meet some or all of the sustainability requirements.
- A similar thing applies to SBP. Where the forest management and carbon requirements are covered by the claim “NL SDE compliant” or “NL SDE controlled” and the chain of custody is also SBP certified, all Dutch sustainability requirements can be met. This is subject to an additional condition that economic operators must be certified according to the voluntary instruction document ID2D or ID2E, so that the information can be correctly represented in the SBP Data Transfer System - Dynamic Batch Sustainability Data (DTS - DBSD).

Two certification schemes for the first link

In the event that two certification schemes are used to cover all requirements at the first link and one of those two schemes subsequently covers all requirements for the supply chain, there will be two (complementary) claims at the end of the supply chain. Both claims need to be entered on the conformity year statement for the respective biomass consignment.

Endorsement of schemes

A different situation arises when one or more certification schemes are used to meet the requirements applicable to the first link and another scheme is subsequently used to pass on this and other information through the supply chain. This is only possible if the certification scheme used for the supply chain “adopts” the claims issued under the certification schemes for the first link. This is referred to by economic operators as “endorsement”.

Under the Dutch system the use of endorsements is permitted, provided that it is clear at the end of the supply chain which claims belonging to which certification schemes have been used to meet the requirements for the first link. In other words, this information must be passed on along the supply chain. This means that if schemes want to make use of endorsement in relation to Dutch requirements, more information must be passed along the chain than is usual for endorsement of certification schemes.

Example: Endorsement of FSC by SBP

Woody biomass from a forest which has been certified in accordance with FSC International V 5.2 and which has been certified for requirements 3.1, 3.2, 4.2, 4.3, 5.1, 12.2, 12.4 and 12.5 via an SBP ID2D group certificate, is sold by an SBP ID2D certified biomass producer as SBP “NL SDE compliant”. SBP records the FSC claim with regard to sustainable forest management in the information transfer system, thus meeting the sustainable forest management requirements. SBP subsequently ensures that this information is correctly passed on along the chain. When endorsement of FSC by SBP is implemented in this way, the SBP certificate holder is able to claim that the timber is sustainable, even though it was an FSC CAB rather than an SBP CAB that performed the on-site audit. The biomass is transported through the supply chain under the claim SBP “NL SDE compliant” and arrives as such at the end user. (NB: Where category 1 biomass is concerned, this claim is subject to the condition that the forest managers must be joint members of a group scheme of SBP and thus be ID2D certified. Where category 2 biomass is concerned, an “NL SDE compliant (RBA)” claim could be possible using SBP ID2E certification (using the Risk Based Approach). For more information, see the SBP scheme documents and the approval decision.

3.4 Geographical scope of the approval

The geographical scope of the approval of a certification scheme could be global or restricted to one or more countries. The geographical scope of an approval is set out in the approval decisions, which can be found via the links in the “Approved schemes” section on the RVO website [6].

The geographical scope relates to the origin of the biomass rather than the supply chain. Nor is it about the location where, for example, wood chips or sawdust are processed into wood pellets. Instead, it is about the source where the wood used to produce the chips was harvested or the source where the residual flow of sawdust originated (i.e., the location of the sawmill).

If the certification scheme provides global coverage and a single set of scheme documents directly applies worldwide, the approval for the geographical scope will also apply globally. Better Biomass is an example of this. Where a scheme is aimed at a single country, the approval will only relate to that country. An example is ATFS, which covers the United States of America.

International meta schemes

A special situation arises in the case of an international metasystem with national standards. In these cases, an international scheme manages a set of generic scheme documents, which can be converted into national standards (“country versions”) at national level by national scheme managers. The national standard provides the basis for certification in the relevant country. This means that the certification audits are carried out on the basis of the national standard rather than the international meta standard.

In the event that an international meta-scheme allows national scheme managers considerable leeway for national interpretation and/or deviations from the meta-scheme requirements, it is possible that sustainability requirements at the national level might differ from the international meta scheme and be more or less stringent. If the international meta scheme meets some or all the Dutch sustainability requirements, there is a risk that the national schemes will not meet the same or all of the same requirements. This is undesirable. In this situation, approval cannot take place at the level of the international meta scheme. Instead, national schemes will have to individually apply for approval.

Where national scheme managers have little or no room to deviate from the meta-scheme requirements, requirements at the national level will be highly similar to the requirements of the international meta scheme. This means that where an international meta scheme meets some or all of the Dutch sustainability requirements, national schemes will automatically be in line with these too. In this respect, an important precondition is that the national schemes must be based on the approved version of the international scheme documents. Where this is not the case, the approval of the international metasystem will not apply to the relevant national scheme. This situation arises in the case of FSC:

FSC international has received approval based on scheme documents that include document “FSC Principles & Criteria Version 5”. The approval decision states that the approval is valid for “all countries and regions where National and Regional Forest Stewardship Standards approved in accordance with FSC P&C V5 are in force”.

FSC country schemes based on an earlier version of the FSC International Principles & Criteria are not automatically approved. However, it is possible to request and obtain separate approval for such country schemes. This is the case, for example, for FSC USA. FSC USA has been separately assessed and approved for some of the sustainability requirements. There is, however, a difference in what is covered. For example, FSC International V5 is approved for requirement 6.3, whereas FSC USA is not.

In order to check whether an FSC claim is valid, it is therefore first necessary to establish the country of origin of the biomass, and whether that country operates a national FSC scheme which is based on the international FSC P&C standard V5 and covers all forest types in the relevant country.

On the RVO website [6]) there is a link to the FSC website to an up to date list of these P&C standard V 5 countries. From the instant a particular FSC P&C standard V 5 country standard is effective, all certified economic operators in that country automatically comply to the criterium to be certified by an approved certification scheme (FSC International approval). For that specific country, this moment can be seen as the moment of a new scheme approval for FSC in this country. Similarly for all other new approvals for certification schemes, it is assumed that all future audits of economic operators are executed according to approved versions of scheme documents. Therefore, no scheme document check is necessary (provided that FSC International's approval is up to date)

If the biomass originates from a country where international FSC P&C standard V5 is not in force, the national FSC scheme must be approved and the biomass consignment must have been certified using the approved set of scheme documents associated with that national FSC scheme (see also section 3.5).

The geographical scope of approved certification schemes can be found in the decisions.

3.5 Different versions of scheme documents

The requirements and rules of a certification scheme are laid down in scheme documents. Scheme documents are regularly amended by the scheme manager, for example on the basis of practical experience with the scheme, new insights regarding sustainability requirements or changes in laws and regulations. When a scheme document is updated, it is assigned a new number and published. In many cases there is then a transitional period, during which companies can be certified according to the new or old version of the certification scheme.

The approval of a certification scheme pertains to the set of scheme documents that the scheme manager has submitted for assessment. These scheme documents are listed in the approval decision (which can be found via the links in the "Approved schemes" section on the [RVO website](#) [6]). When a certification scheme replaces one of these scheme documents with a new version or publishes a completely new scheme document, the Dutch approval does not automatically apply to it.

New versions of a scheme document that was previously included in the approval decision must always be resubmitted by the scheme manager for re-assessment. Entirely new scheme documents that were not previously included in the approval decision and could impact on the earlier approval, must also be submitted for assessment.

If the scheme document is a document that does not affect the approval decision, there is no need to submit it for assessment. In case of any doubts or questions about the need to submit a document for assessment, a scheme manager can contact the Netherlands Enterprise Agency.

If the new scheme document is approved, it becomes part of the set of approved documents. From that time onwards, biomass from economic operators certified according to the new scheme document may be included in the annual statement of compliance

Please note: If a new version of a previously approved scheme document is approved, the approval of the old version of the scheme document remains valid. In practice, however, the scheme manager will no longer permit the old version to be used (after a transition period during which both the new and old version may be used, if applicable).

Approval of the new scheme document by the Minister of Economic Affairs and Climate Policy must be in place from the time that the scheme administrator no longer permits the old scheme document to be used. If not, neither the old nor the new scheme document can be used, since the scheme manager has prohibited any further use of the old document and the new document has yet to be approved for the Dutch requirements. In this situation, the scheme is unusable.

Check on the use of the correct scheme documents

If an energy producer wishes to use a certification scheme to demonstrate that the biomass complies with some of the Dutch sustainability requirements, information about the certificate used must be passed along the biomass chain (in accordance with chain of custody requirement 12.4). This information includes the scheme used, the certificate number of the previous link in the chain and the claim associated with the certificate. The chain generally does not pass on information regarding the version of the scheme documents that was used for the audit. However, the version of the main document used for the audit can still be checked in the certificate register on the website for the certification scheme.

The CAB that draws up the conformity year statement can consult the certificate register to check whether approved (main) scheme documents from approved certification schemes were used for biomass consignments. In practice, the CAB will check whether an energy producer has an adequate procedure for checking the versions of schemes used for biomass consignments, and whether this procedure has been properly applied in practice.

In all circumstances it is the energy producer who must ensure all certified biomass consignments were delivered using approved scheme documents, both by all previous links in the biomass chain and by the energy producer itself. The energy producer cannot use the excuse that the scheme manager failed to submit a scheme document for review, or failed to do so on time, or that a CAB conducted an audit on the basis of as yet unapproved scheme documents.

In view of this responsibility, energy producers are advised to monitor whether new scheme documents of certification schemes they use or wish to use are submitted for assessment by the scheme manager (quickly), and raise this with the scheme manager to account if necessary. It could also be important to communicate on this subject with other links in the chain and with CABs that carry out certification in the chain. This is particularly relevant if (during a transitional period) the scheme offers the possibility to obtain certification against the old or the new scheme document and, at the same time, the new document has not yet been approved for use within SDE+. In these cases, it is advisable to obtain certification against the old scheme document.

3.6 Group certification and combining claims

Group certification means there is a single certificate which covers a group of forest managers or another group of operators within the supply chain. The basic principle of group certification is that the group as a whole meets the requirements that also apply to individual parties. The group certificate is issued to the group manager representing the forest managers or the operators within the supply chain. It is the responsibility of the group manager to ensure that all group members comply with the applicable sustainability requirements. The CAB audits the group manager and also conducts random checks among the group members.

The Dutch sustainability requirements permit group certification for forest managers and the supply chain. The requirements are captured in Principle 11 (forest management) and Principle 13 (chain of custody).

Group certification can be used to cover some or all of the applicable sustainability requirements.

In case of partial coverage, the following situations may apply:

1. The group certificate covers part of the requirements, with the remaining requirements checked by way of verification;
2. The group members hold individual certificates. This individual certificate covers part of the requirements and the group certification is used to cover the remaining requirements (gaps).

Group certification within SBP

SBP offers an approved group certificate specifically for the Dutch market. The group manager may only enter biomass with the status NL SDE compliant (ID2D) into the SBP DTS system if both the group manager and the group members are certified on the basis of the voluntary ID2D instruction document. This “status” is not a formal claim under the SBP scheme but a subcategory of SBP compliant biomass. It is important to note that “SBP compliant” is not an approved claim for category 1 or 2 material and therefore cannot be used for biomass for which SDE+ subsidy is received unless it is combined with this additional “status”.

In cases where a group certificate is used to combine sustainability claims, it must be possible to show at the end of the chain which certificates from approved schemes were used for each biomass consignment (in the same way in which this applies to certificates for individual forest managers or supply chain parties, see Section 3.3).

Example: A group of forest management units is ATFS certified. This covers part of the sustainability requirements. SBP group certification is then used to cover the additional requirements (the gaps). In this case, at the end of the chain, it must be possible to show for all consignments carrying an SBP claim based on this group certificate that there is an ATFS certificate which covers the other requirements.

The approval decision of a certification scheme indicates whether the scheme is approved for group certification. The approval decisions can be found via the links in the “Approved schemes” section of the RVO website [6].

3.7 Relationship between the Risk Based Approach (RBA) and certification

The Risk Based Approach (RBA) makes it possible for small-scale forest management units (< 500 ha) to demonstrate compliance with sustainable forest management requirements at a regional level. By adopting this approach, small-scale forest managers in a region, also referred to as a ‘defined area of origin’, do not need to be individually certified or undertake individual verification.

The risk assessment can be carried out by the biomass producer or another economic operator who is the First Collecting Point in the supply chain. This can be done in two ways:

1. The party conducting the risk assessment is certified according to a certification scheme which has been approved for the RBA. ISCC, GGL and SBP are approved for the RBA. In the case of SBP, only biomass producers certified according to the voluntary ID2E instruction document (group certificate SBP biomass with the status “NL SDE compliant (ID2E)”) can add entries in the SBP DTS system.
2. The party conducting the risk assessment is not certified according to a certification scheme which has been approved for the RBA. In this case, verification must be carried out in order to establish that the risk assessment has been conducted in the correct manner (see also Chapter 8 of the Verification Protocol).

Please note: The RBA can only be applied for forest management units < 500 ha. If the defined region also includes forest management units covering in excess of 500 ha, certification and/or verification of these will have to be carried out individually. This must be clearly set out when categorising the biomass (see Chapter 2). In addition, application of the RBA is only permitted within a limited timeframe, i.e., until 1 January 2023. After this date, this possibility will expire.

The approval decision of a certification scheme will indicate whether the scheme has been approved for the RBA. The approval decisions can be found via the links in the “Approved schemes” section of the RVO website [6].

3.8 Recognition of conformity assessment bodies (CABs)

CABs have an important role in demonstrating that biomass meets the Dutch sustainability requirements. They are authorised to perform three types of activities:

1. issuing a certificate to economic operators based on a certification scheme that has been fully or partially approved by the Minister of Economic Affairs and Climate Policy. These activities by a CAB are carried out within the context of the relevant certification scheme;
2. issuing a verification statement to an economic operator, based on the requirements of the Verification Protocol for Sustainable Solid Biomass for Energy Applications.
3. issuing an conformity year statement to an energy producer, based on the requirements of the Verification Protocol for Sustainable Solid Biomass for Energy Applications.

CABs are only permitted to carry out these activities if they have been recognised for this purpose by the Minister of Economic Affairs and Climate Policy. A CAB may be recognised for one or more of the activities listed above. Certificates and declarations are valid only when issued by a recognised CAB. The box below summarises how recognition is achieved.

A CAB working for a certification scheme must comply with the requirements that the certification scheme imposes on CABs and the activities carried out by CABs.

This is monitored by the accreditation body associated with the certification scheme. This can be a national accreditation body, such as the Dutch Accreditation Council (RvA), or another body (for example ASI).

For the purpose of the Dutch system of sustainability requirements, a CAB also needs to be recognised by the Minister of Economic Affairs and Climate Policy (in other words: recognition by the scheme manager does not automatically translate to recognition for the Dutch scheme). As a result of the Dutch recognition the CAB is subject to the public supervision of the Netherlands Emissions Authority (NEa), which is supplementary to the supervision set up as part of the certification scheme itself.

The “Recognised CABs” section on the [RVO website](#) [6] provides an overview of accredited CABs and the scope of their recognition.

Application for recognition to perform CAB activities

CABs can apply to the Netherlands Enterprise Agency for recognition for a certification scheme and/or for performing the activities related to the Verification Protocol.

One of the conditions for recognition is that the CAB must hold accreditation for the approved certification scheme or the verification protocol. CABs can apply for accreditation for activities for the verification protocol with the [Dutch Accreditation Council \(RvA\)](#). In case of activities relating to an approved certification scheme, the corresponding accreditation is also assessed as part of the recognition procedure.

The conditions for the recognition of a CAB are laid down in the Decree on the Conformity Assessment of Solid Biomass for Energy Applications (Besluit conformiteitsbeoordeling vaste biomassa voor energietoepassingen).

4 Correct application of certification schemes and claims for biomass consignments

This chapter contains a checklist for the correct application of certification schemes and associated claims in respect of biomass consignments. The checklist helps bioenergy producers and CABs to use certification schemes and claims in the right way in order to demonstrate that all or some of the Dutch sustainability requirements have been met. This could be prior to the purchase or actual delivery of a biomass consignment, or to check at a later date whether a consignment meets all sustainability requirements.

Questions 1 and 2 of this checklist are about determining and verifying the biomass category. Questions 3-5 are about the correct use of certification schemes.

The questions and answers in the checklist contain references to sections in the preceding chapters of this guide. For a clear understanding, users are advised to always use the checklist and the background information provided in these chapters side by side.

Please note: The checklist helps to ensure but does not guarantee that the information for biomass consignments is complete and accurate. This determination is a matter for the CAB who draws up the annual statement of compliance.

Determining and checking the biomass category

1. Is the consignment accompanied by information from the first link in the supply chain that clearly identifies the applicable category of biomass?

Response: Yes - > Go to question 2

Response: No > The biomass category must be determined by verifying information from the first link. All links in the supply chain must then be verified in order to establish that the information on the biomass category has been correctly passed along the supply chain.

2. Has the CAB that certified the first link in the biomass supply chain checked the categorisation?

Response: Yes. The first link in the supply chain holds a certificate that has been approved for requirement 12.4 and both the information regarding the biomass category and the information about the certificate have been passed on correctly along the supply chain. It is clear from this information that the CAB having certified the first link checks in its annual audits that the biomass producer has correctly determined the biomass categories of consignments. -> Go to question 3 of this checklist.

Response: No, because the first link in the supply holds a certificate that has not been approved for requirement 12.4. > The biomass category must be approved by verification at the first link. All links in the supply chain must then be verified in order to establish that the information on the biomass category has been correctly passed along the supply chain.

See Chapter 2 of this Guidance for background information to Part 1 of this checklist.

Use of certification schemes for the defined biomass category

For questions 3-5 it is assumed that the biomass category has been determined at the first link in the supply chain (see questions 1-2).

3.1 Has the biomass been delivered with a claim belonging to a certification scheme that has been approved for some or all of the sustainability requirements applicable to the first link in the supply chain for this biomass category (see Table 2.1)?

Response: Yes. The biomass has been delivered with a claim belonging to a certification scheme that has been approved for some or all of the requirements that apply to the first link.

Response: No. Verification is required for all requirements applicable to the first link.

(In order to fulfil the requirements for “controlled” (category 1 and 2) biomass, verification is needed for some of the requirements listed in Table 2.1., specifically greenhouse gas emissions (1.1, for the part of the requirement that applies per consignment), carbon and land use change (3.1–5.1), and sustainable forest management requirements 7.1 and 7.3.)

3.2 Have all of the following conditions for use of the certification scheme and claim been met?

- a. Has the certification scheme been approved for the country of origin of the biomass? (See also section 3.4 of this Guidance)
- b. Have the approved scheme documents (correct versions) for the certification scheme been used? (See also section 3.5 of this Guidance)
- c. Has the claim on the biomass certificate been approved in relation to Dutch sustainability requirements? (See also section 3.3 of this Guidance)
- d. Has the certificate been issued by a CAB recognised for the scheme by the Netherlands Enterprise Agency? (See also section 3.8 of this Guidance)
- e. Has the scheme been approved for application of the Risk Based Approach (RBA)? **Please note:** This condition only applies to category 2 biomass and only if the RBA is in fact used. Use of the RBA is permitted until 1 January 2023. (See also section 3.7 of this Guidance)

Response: Yes. The certificate may be used to demonstrate that some or all of the requirements applicable to the first link have been met -> Go to question 3.3.

Response: No, one or more of these conditions have not been met. The certificate cannot be used. Verification is necessary at the first link for all requirements that the certificate was intended to cover.

3.3 Has the certification scheme used been approved for all requirements that apply to the first link of this biomass category (Table 2.1)?

Response: Yes. No supplementary certificate and/or verification is required with regard to the applicable requirements -> Go to question 5.1

Response: Go to question 4.1

Response: No, but the scheme is approved for all requirements that apply to “controlled” (category 1 and 2) biomass: greenhouse gas emissions (1.1, for the part of the requirement that applies per consignment), carbon and land use change (3.1–5.1), and requirements 7.1 and 7.3 on sustainable forest management. If the biomass is to be classified as “controlled biomass”, no additional certificate and/or verification is needed for the applicable requirements -> Go to question 5.1.

4.1 Have the requirements applicable to the first link in the supply chain for this biomass category (see Table 2.1) that were not covered by the certificate specified in questions 3.1–3.3 been fulfilled using a second claim belonging to a second approved certification scheme?

Response: Yes. The biomass has been delivered with a (second) claim belonging to a (second) certification scheme that has been approved for some or all of the sustainability requirements that apply to the first link -> Go to question 4.2.

Response: No. Verification is required for all applicable requirements that are not covered by the certificate specified in questions 3.1–3.3.

(In order to fulfil the requirements for “controlled” (category 1 and 2) biomass, verification is needed for all of the following requirements that are not covered by the certificate specified in questions 3.1–3.3: greenhouse gas emissions (1.1, for the part of the requirement that applies per consignment), carbon and land use change (3.1–5.1) and sustainable forest management requirements 7.1 and 7.3).

4.2 Have all of the following conditions for use of the second certification scheme and second claim been met?

- a. Has the certification scheme been approved for the country of origin of the biomass? (See also section 3.4 of this Guidance)
- b. Have the approved scheme documents (correct versions) for the certification scheme been used? (See also section 3.5 of this Guidance)
- c. Has the claim on the biomass certificate been approved in relation to Dutch sustainability requirements? (See also section 3.3 of this Guidance)
- d. Has the certificate been issued by a CAB recognised for the scheme by the Netherlands Enterprise Agency? (See also section 3.8 of this Guidance)
- e. Has the scheme been approved for application of the Risk Based Approach (RBA)? **Please note:** This condition only applies to category 2 biomass and only if the RBA is in fact used. Use of the RBA is permitted until 1 January 2023. (See also section 3.7 of this Guidance)

Response: Yes. The certificate may be used to demonstrate that some or all of the sustainability requirements applicable to the first link have been met -> Go to question 4.3

Response: No, one or more of these conditions have not been met. The certificate cannot be used. Verification is required for all requirements that the certificate was intended to cover.

4.3 Has the second certification scheme been approved for all of the requirements applicable to the first link (see Table 2.1) that are not covered by the first certificate specified in questions 3.1–3.3?

Response: Yes. Both certificates together cover all requirements that apply to the first link. No additional verification is required.

Response: No. Additional verification is required for all requirements applicable to the first link that are not covered by either certificate.

Response: No, but both certificates together do cover all the requirements that apply to the first link with regard to “controlled” (category 1 and 2) biomass: greenhouse gas emissions (1.1, for the part of the requirement that applies per consignment), carbon and land-use change (3.1–5.1), and requirements 7.1 and 7.3 on sustainable forest management. If the biomass is to be classified as “controlled biomass”, no additional certificate and/or verification is needed for the applicable requirements -> Go to question 5.1.

Please note: In cases the requirements relating to group certification (requirements 11.1 and 11.2) are not covered by either scheme but there is no group certification, verification against requirements 11.1 and 11.2 is not necessary.

5.1 Does the claim used for the supply chain belong to a certification scheme that has been approved for some or all of the chain of custody requirements (see Table 2.1)?

Response: Yes. The biomass has been delivered with a claim belonging to a certification scheme that has been approved for all or part of the chain of custody requirements -> Go to question 5.2.

Response: No. Verification is required for all of the chain of custody requirements.

5.2. Have all of the following conditions for use of the certification scheme and claim been met?

- a. Have the approved scheme documents (correct versions) for the certification scheme been used? (See also section 3.5 of this Guidance)
- b. Has the (chain of custody) claim for the biomass certificate been approved for the Dutch sustainability requirements? (See also section 3.3 of this Guidance)
- c. It is clear whether the chain of custody scheme has adopted one or more claims from other certification schemes at the first link and it is also clear which claims these are (in other words, the information regarding the schemes according to which the first link has been certified is available at the end of the supply chain; see also section 3.3 of this Guidance)
- d. Has the certificate been issued by a CAB recognised for the scheme by the Netherlands Enterprise Agency? (See also section 3.8 of this Guidance)

Response: Yes. The certificate may be used to demonstrate that some or all of the applicable chain of custody requirements have been met. -> Go to question 5.3

Response: No, one or more of these conditions have not been met. The certificate cannot be used. Verification is required for all requirements that the certificate was intended to cover.

5.3 Has the certification scheme used been approved for all of the chain of custody requirements (see Table 2.1)?

Response: Yes. No additional verification is required with regard to the chain of custody requirements.

Response: No. Additional verification is required for all of the chain of custody requirements not covered by the certification scheme.

Please note: If group certification is not used within the chain, verification of requirements 13.1-13.3 is not necessary.

5 References

- [1] Decree and Regulation on the Conformity Assessment of Solid Biomass for Energy Applications.
- [2] **RVO (2017)**. Verification Protocol for Sustainable Solid Biomass for Energy Applications. – January 2020 version RVO-010-2020/BR-DUZA. Utrecht, January 2020.
- [3] **RVO (2019)**. Guidance on the classification of biomass: categories and NTA 8003 codes under the SDE+ scheme. Publication number RVO-182-1901/BR-DUZA. Utrecht, December 2019.
- [4] **RVO (2017)**. Guidance Chain of Custody Publication number RVO-010-1801/BR-DUZA. Utrecht, April 2020.
- [5] **RVO (2018)**. Guidance with the template list for sustainable consignments (associated with the conformity year statement as described in the Verification Protocol for Sustainable Solid Biomass for Energy Applications). Version: 2020-01. Utrecht, January 2020.
- [6] **RVO**. Website with information about SDE++ sustainability requirements for solid biomass www.rvo.nl/duurzaamheidseisen (consulted on 3 March 2021).

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