



**SUSTAINABLE RESOURCES**  
Verification Scheme GmbH

## Scheme principles for the production of forest biomass

Version: SSP-FOREST-en-3.0

Date: May 20<sup>th</sup>, 2025

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# 1 Introduction

Directive (EU) 2018/2001 (RED II) and Revised Directive (EU) 2018/2001 (for short RED III) set political targets for the EU member states to significantly increase the share of renewable energy in our energy consumption by 2030. The use of biomass as a renewable raw material will play an important role in these efforts.

In particular, the use of wood to generate electricity and heat<sup>1</sup> can be an effective way to significantly reduce the CO<sub>2</sub> emissions arising from energy production. In addition to the use of wood residues and wood waste, the use of forest biomass in the energy sector will also increase in the future.

This is conditional on the sustainable management of forests in the production of forest biomass and its responsible use along the value chain until it is converted into electricity or heat. Risks associated with the overuse of the available potential in the forest or the development of detrimental GHG balances must be avoided from the outset in order to ensure the sustainability of wood used for energy purposes.

The European Union has adopted these kinds of sustainability requirements for the generation of electricity and heat from biomass fuels in Directive (EU) 2018/2001 and its revised version (RED III), which must be complied with by the economic operators. Voluntary schemes are regarded here as a particularly suitable way of providing this evidence of compliance in an objective, transparent and credible manner.

The SURE system is this kind of voluntary scheme, which translates the requirements of RED III into a practical verification scheme for the market and ensures compliance.

# 2 Scope of application

The requirements set out in this document for the sustainable production of forest biomass apply to all companies that produce forest biomass and feed it into the supply chain for use as energy<sup>2</sup>. Wastes and residues that are directly generated by forestry are considered forest biomass under Revised Directive (EU) 2018/2001. Therefore, the scope of this document explicitly covers waste and residues from forest biomass before processing.

All relevant SURE documents as well as Revised Directive (EU) 2018/2001 apply to the scope of this scheme.

## 3 Definitions

In order to establish a common understanding of the terms and definitions used in these scheme principles, reference is made to the SURE document “Definitions in the SURE system”. All SURE scheme principles relate to this document.

## 4 General principles and requirements

Producers who supply forest biomass for electricity and heat production must demonstrate that they comply with the requirements of the Revised Directive (EU)2018/2001 and the SURE-EU system.

This chapter describes the general requirements to verify and monitor conformity for biomass producers. The specific sustainability requirements and greenhouse gasses calculation criteria focussing on the production of forest biomass are defined in Chapter 5 of this document.

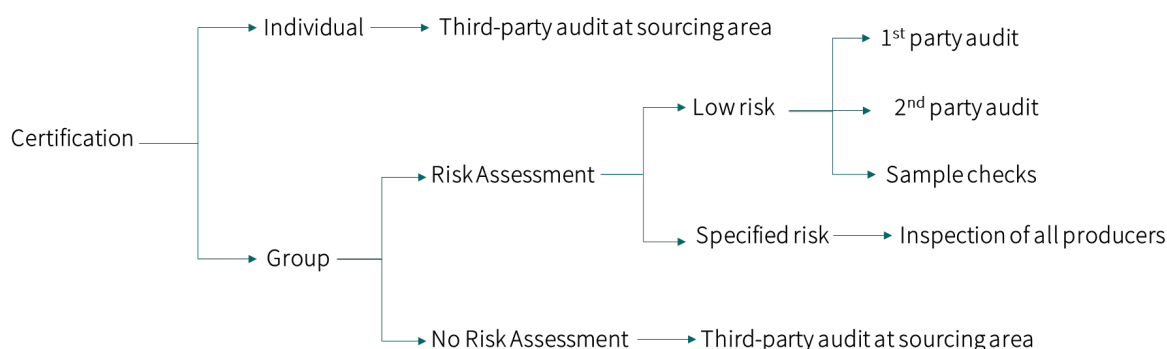
### 4.1 Verifying and monitoring scheme conformity

Producers who supply forest biomass for electricity and heat production can demonstrate compliance with the Revised Directive (EU)2018/2001 and the SURE-EU system either via individual certification or via group certification. For forest biomass, sustainability can be proved through *audits in the sourcing area* (so called “level B approach”) or a *risk-based approach* (so called “level A approach”). The level of risk resulting of the risk assessment determines the means of verification of scheme conformity.

Only in the case of a low-risk evaluation, verification can be done through first or second-party audit. In any other case, verification is carried out through third-party audit or inspection<sup>3</sup>.

The possibilities of verification of conformity are summarized in Figure 1 and explained in the following sections.

The sustainability requirements that apply both for the audits in the sourcing area and for the risk-based approach are identical under the SURE EU system. These are detailed in Chapter 5. The difference between one approach and the other are the means of verification of scheme conformity.



**Figure 1.** Possibilities of verification and proving conformity for forest biomass

In the SURE-EU system, in audits and inspections, compliance with sustainability requirements for forest biomass can be verified in their sourcing area using the SURE checklist for the production of forest biomass according to the criteria of article 29 (6b) and (7b) of the Revised Directive (EU) 2018/2001. Certification bodies approved and accredited by national authorities in the SURE-EU system verify compliance with the scheme requirements along the entire production, processing and supply chain as part of a neutral inspection or audit.

The traceability of the sustainably produced raw materials for biomass must be guaranteed in the forest biomass production operation and verification must be possible using appropriate documents (e.g. invoices, contracts, etc.). In addition, the forest biomass producer must grant access to these documents and keep the documentation for at least five years as long as no other laws apply with regard to retention periods.

In addition, the requirements from Section 4.3 “Traceability and documentation” apply.

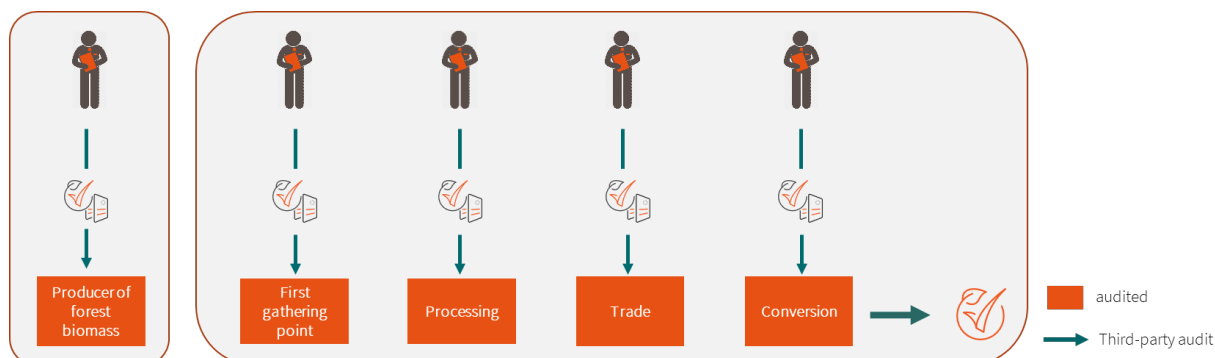
The respective documents verifying that the individual criteria of the SURE-EU system have been met must either be kept by the group manager (when corresponding) or be able to be provided by the forest biomass producer at any time.

The documentation on the location of the sourcing area must be kept by the forest biomass producer and be able to be provided at any time for the purpose of a neutral inspection – also independently of an ongoing certification process of the group manager.

#### 4.1.1 Individual certification

In the SURE-EU system, forest biomass producers can be inspected as an individual company or as a group. Individual forest biomass producers who want to be certified under the SURE-EU system must go through a neutral inspection. For that purpose, they must first register with the SURE-EU system. This can be done online at [www.sure-system.org](http://www.sure-system.org). The steps for joining the scheme are described in detail in the SURE document “Scope and basic scheme requirements”.

A detailed description of the requirements for neutral inspection can be found in the SURE document “Scheme principles for the certification process – Requirements and specifications”.

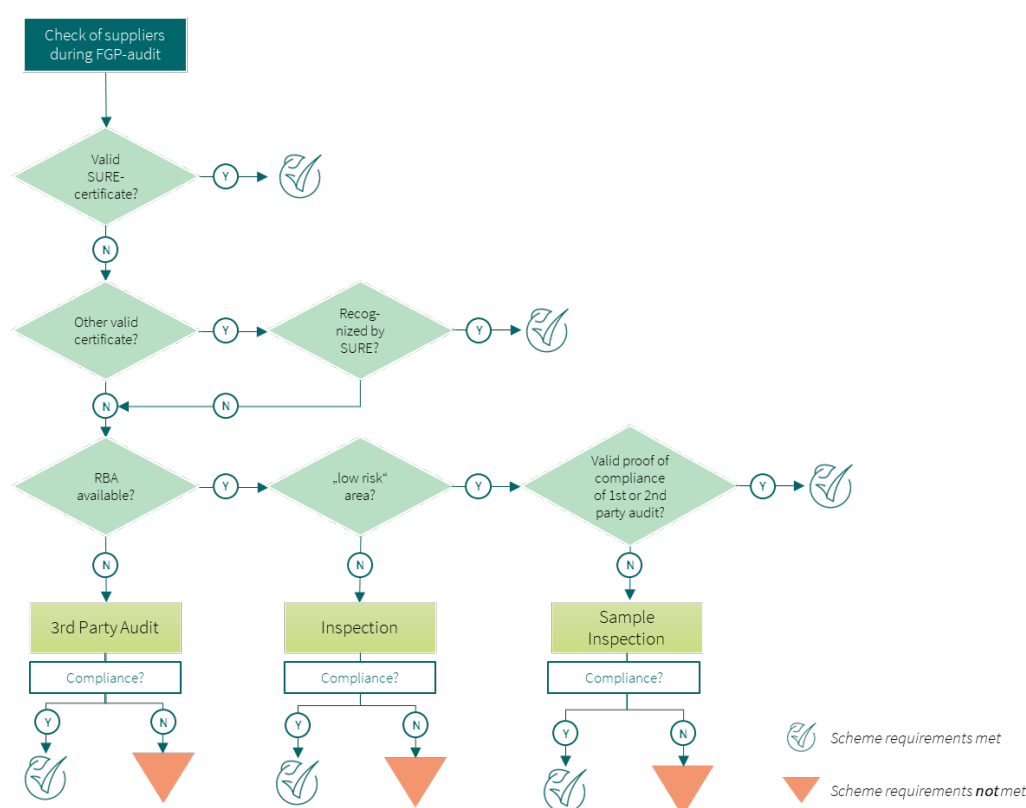


**Figure 2.** Individual certification for forest biomass producers

### 4.1.2 Group certification of forest biomass producers

A group of forest biomass producers with similar production conditions may be subject to group certification. The type of inspection to which the forest biomass producers of the group are subject to depends on the risk assessment (explained in the next section). In case there is no risk assessment for the sourcing area, an independent, third-party audit to all the forest producers of the group will be carried out according to the criteria of article 29 (6b) and (7b) of the Revised Directive (EU) 2018/2001. If there is a risk assessment that classifies the sourcing area as “specified risk”, then all the forest biomass producers are inspected also according to the criteria of article 29 (6b) and (7b) of the Revised Directive (EU) 2018/2001. Finally, if there is a risk assessment that classifies the area as “low risk”, first or second party audit up to the first gathering point are accepted, and no certification or external inspection is needed. In the case of “low risk” result, sample inspections of the forest biomass producers, where the inspection is considered to apply to the group as a whole, are also possible. These possibilities are summarized in the Figure 3.

A detailed description of the requirements for group certification can be found in the SURE document “Scheme principles for the certification process – Requirements and specifications”. Requirements for first- and second-party audit can also be found in the document “Scheme principles for the certification process”.



**Figure 3.** Verification of forest biomass suppliers.  
 NOTES: *RBA*: Risk based assessment. *FGP*: First gathering point

### 4.1.3 Risk-based approach as proof of conformity

Pursuant to Directive (EU) 2018/2001 and its revised version, proof of conformity with the principles of sustainable forest management can be provided using a risk-based approach that assesses the risk of using unsustainable forest biomass for the production of bioenergy. The risk assessment is a valid proof of conformity only for group certification. In the *absence of a risk assessment*, a third-party audit at the sourcing area has to be carried out to proof conformity.

A risk assessment must demonstrate that laws at national or sub-national level apply to the sourcing area of forest biomass which ensure at a minimum that

- ✓ the forest biomass has been legally harvested, processed and traded/distributed in accordance with national legislation and international conventions,
- ✓ areas designated by international or national legislation or by the competent authority as nature conservation areas, including wetlands, grassland, heathland and peatland, are protected, with the aim of preserving biodiversity and preventing habitat destruction,

- ✓ forest biomass is harvested in compliance with the restrictions that apply to valuable landscapes, i.e., land with high biodiversity value, wetland and peatland status in reference to the cut-off date,
- ✓ care is taken during harvesting to preserve soil quality and biodiversity in order to minimise damage and in accordance with sustainable forest management principles,
- ✓ forest is continuously regenerated on the harvested areas,
- ✓ the long-term production capacity of the forest is maintained and

installations producing biomass fuel from forest biomass issue a statement of assurance that the biomass is harvested in compliance with the restrictions that apply to the above-mentioned valuable landscapes. If there is no legislation ensuring the statements of assurance at national/sub-national level (Level A), evidence has to be provided through an audit and/or inspection in the sourcing area (Level B) that the biomass does not come from the no-go areas (according to Article 29(3), points (a), (b), (d) and (e), Article 29(4), point (a), Article 29(5) of the Revised Directive (EU) 2018/2001).

In the SURE-EU system, these risk assessments for the production of forest biomass may be recognised if they document, on the basis of an objective, transparent and detailed analysis, that the sourcing area is located entirely in a country where

- 1) laws or other regulations apply at national or sub-national level, which have already transposed equivalent requirements for the production of forest biomass into national law pursuant to Articles 29 (6) and 29 (7) of RED III.

The description of the legal framework must clearly identify the applicable laws and transparently reference the relevant paragraphs, sub-paragraphs or sections that ensure compliance with the requirements of the SURE-EU system and the criteria of RED III.

- 2) the enforcement of this legal framework, its monitoring and, where appropriate, any sanctioning measures are clearly regulated and can be clearly described.

If the risk assessment concludes that there is a *low risk* of non-sustainable forest management in the area where the forest biomass is sourced because the criteria are already regulated by law, monitored by the authorities and sanctioned accordingly in the event of non-compliance, the forestry operation is *not subject to certification* under the requirements of the SURE EU scheme. In this case, under the SURE-EU system, there are two options to prove compliance (Figure 3):

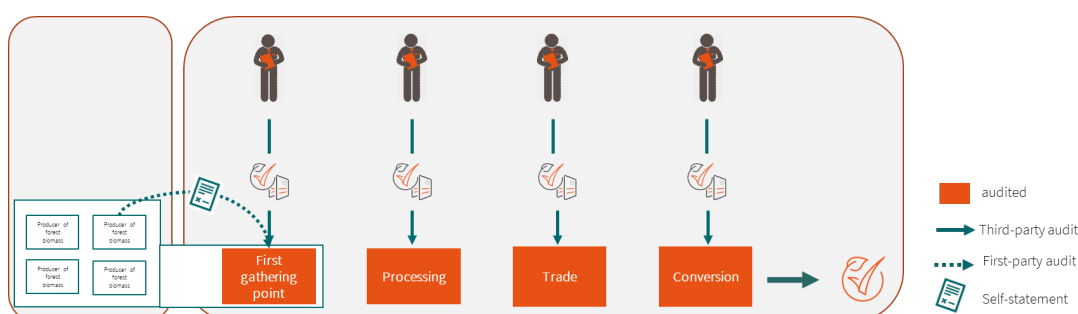
- 1) *First- or Second-party audit (level A approach)*. Pursuant to Revised Directive (EU) 2018/2001, only in the case that the sourcing area is evaluated as low-risk, internal

and supplier audits (first- or second- party audits respectively) up to the first gathering point may be used to prove compliance.

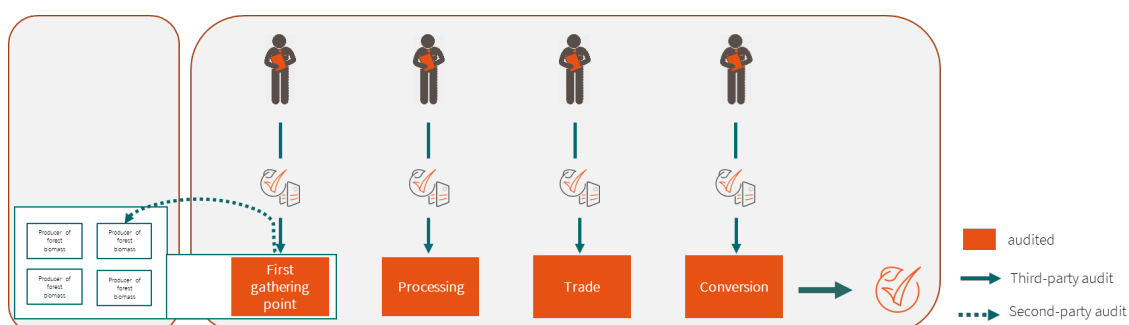
In the case of first-party audits or self-assessments, forest biomass producers must provide a *self-statement* as proof of compliance with SURE-EU system requirements to the first gathering point (Figure 4). The SURE form “Self-statement for producers of forest biomass” should be filled out and provided to the biomass recipient.

In the case of second-party audit, by the first gathering point, the check list shall be used (Figure 5). The document is available at [www.sure-system.org](http://www.sure-system.org). The characteristics and requirements of the second-party audit are described in the document “Scheme principles for the certification process”.

As part of their audit, first gathering points are obliged to prove (a) whether the requirements for a supplier audit or for accepting self-statements as part of a first-party audit are met and (b) whether conformity with the RED III requirements has been demonstrated by the suppliers. Further details on the requirements for the first gathering points audits can be found on the document “Scheme principles for the certification process”.



**Figure 4.** First-party audit as mean of verification for forest biomass producers in low-risk sourcing areas.

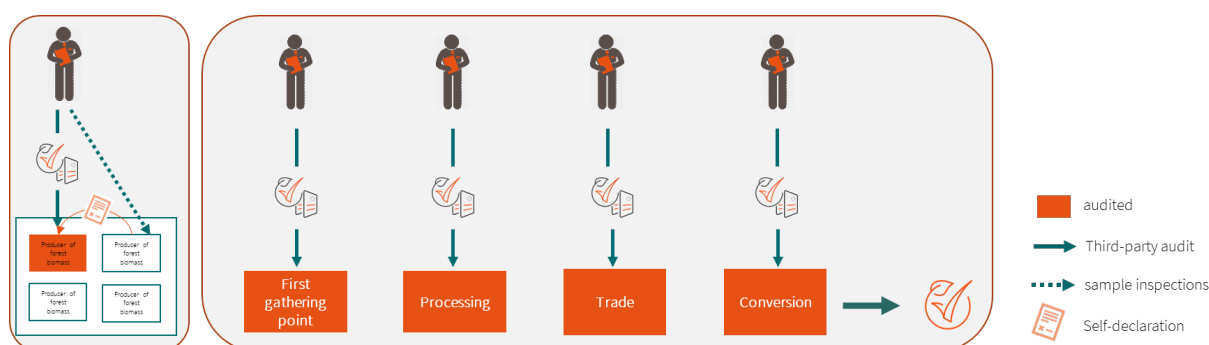


**Figure 5.** Second-party audit as mean of verification for forest biomass producers in low-risk sourcing areas.

- 2) *Sample inspections.* In the case that the group manager is different from the first gathering point, sample inspections to the forest biomass producers have to be conducted to prove compliance, as part of the scheme audits of the group manager

(Figure 6). They can also be used as an alternative to first- and second-party audit. In this case, the producer must submit a signed *self-declaration* to the group manager that

- ✓ at the time the biomass is harvested, an up-to-date and recognised risk assessment is available for the forest biomass sourcing area,
- ✓ the scope of the risk assessment fully covers the sourcing area and
- ✓ exhibits a *low risk* of unsustainable forest management in the sourcing area.

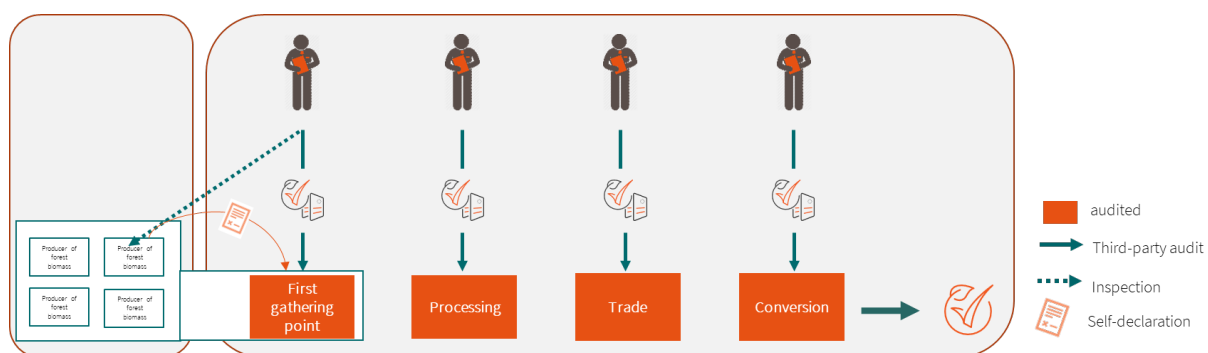


**Figure 6.** Sample inspections as mean of verification for forest biomass producers in low-risk sourcing areas.

If the risk assessment concludes that one or more criteria of RED III or the SURE-EU system are not or are not fully regulated or enforced by law, or if there is no corresponding documentation, the region in question is considered a region with a *specific risk* (“specified-risk”). The sustainability criteria for which a specified risk was identified in the risk assessment must be verified in a neutral inspection in the sourcing area according to the SURE-EU scheme principles for the “production of forest biomass”. In this case, the producer must submit a signed *self-declaration* to the group manager confirming that

- ✓ at the time the biomass is harvested, an up-to-date and recognised risk assessment is available for the forest biomass sourcing area,
- ✓ the scope of the risk assessment fully covers the sourcing area and
- ✓ there is a *specified risk* of unsustainable forest management in the sourcing area.

*All producers* that supply forest biomass from sourcing areas found to have a “specified-risk” in the risk assessment and that have submitted a self-declaration for forest biomass from specified-risk areas are inspected on site as part of the audit of the group manager for conformity with the SURE scheme principles for the production of forest biomass.



**Figure 7.** Inspections as mean of verification for forest biomass producers in specific-risk sourcing areas. This way of verification also applies when the group manager is not the first gathering point, but a forest biomass producer.

A detailed description of the requirements and instructions for preparing risk assessments for the production of forest biomass can be found in the SURE document “Technical guidance for the assessment of the risk of unsustainable production of forest biomass”.

SURE expressly reserves the right to recognise risk assessments by other (voluntary) schemes, institutions, authorities or other third parties, provided that they meet at least requirements equivalent to those set by SURE.

The risk assessments are recognised either by the SURE Technical Committee and announced by newsletter and published on the website [www.sure-system.org](http://www.sure-system.org) or verified during the certification process by the competent certification body.

The SURE-EU system makes the recognised and approved risk assessments available to its scheme participants on its website [www.sure-system.org](http://www.sure-system.org).

#### 4.1.3.1 The self-declaration and the self-statement

Under the risk-based assessment, two key documents operate as proof of conformity for the forest biomass producers: the self-statement in the case of first-party audits, and the self-declarations (both for low and specific risks) in the cases of inspections.

Both documents are available on the SURE website at [www.sure-system.org](http://www.sure-system.org).

These forms can be used for every individual consignment or all consignments arising from an agreement or contract. If the self-declaration or self-statement is used for all consignments in an agreement or contract, the contract number or agreement number must be indicated on the self-declaration or self-statement.

It is also possible to incorporate the same wording in the self-declaration or self-statement as text in the contract between the group manager and the biomass producer.

The self-declaration or self-statement are valid for one year, starting from the date of issue, and apply to each quantity of forest biomass supplied during its period of validity.

The relevant documents proving compliance with the requirements, in particular the documentation on the location of the area where the forest biomass was sourced, must either be available to the group manager or be available at any time from the producer for the purpose of neutral inspection – also independently of an ongoing certification process of the group manager. This includes in particular:

- ✓ clear and verifiable information to identify the area and location of the sourcing area, e.g. by means of geographical coordinates, a polygon or similar verification of the area via field blocks, plots or parcels, or politically defined regions such as county, state or national borders
- ✓ a clear reference to the relevant risk assessment, including title, source, creation date and validity period and a copy of the risk assessment
- ✓ a valid self declaration or self-statement (copy or original)

All of the documents in the document management system must be kept for at least 5 years regardless of any other legal requirements relating to retention period.

In the self-declaration only, the biomass producer also confirms and accepts that, within the scope of audits by the group manager to whom the producer supplies sustainable biomass, inspections can be performed by the voluntary scheme or the executing certification body.

## 4.2 Traceability and documentation

The SURE-EU system requires all economic operators to have a document management system that can be checked as part of audits. Proper documentation is mandatory for all economic operators to ensure compliance with the legal provisions. All of the documents in the document management system must be kept for at least 5 years regardless of any other legal requirements relating to retention period.

In terms of forest biomass, the traceability of the biomass or biomass fuels must be ensured by means of a mass balance system. In this case, the biomass from the harvest counts as incoming biomass. Type, quantity and origin of the biomass must be plausible. The general requirements of a scheme-compliant mass balance system are described in detail in the SURE document “Technical guidance for mass balancing”.

Producers who process waste and residues by purely mechanical methods must document changes in quantities (ratio of input/output). This must be checked by the auditor and verified during the audit.

All economic operators in the SURE-EU system are required to provide data to SURE on request (for example, when necessary to verify the full traceability of sustainable biomass and biomass fuels).

When transmitting sensitive company data, proof must be provided that this data is handled confidentially.

## 4.3 Verification of the status of land and land-related information

In order to demonstrate their conformity with Revised Directive (EU) 2018/2001, forest biomass producers must keep records of the harvesting areas, providing the information necessary to comply with the Directive. RED III establishes restrictions on biomass harvesting in certain valuable landscapes, such as high biodiversity or high-carbon stock land. These restrictions are specified in Article 29 paragraph 3, subparagraphs a, b, d and e, Article 29 paragraph 4, subparagraph a and Article 29 paragraph 5 of the RED III. Proof of land status is therefore particularly important to demonstrate that forest biomass is harvested respecting areas where restrictions on biomass harvesting apply.

In most cases, several documents or corresponding proof are required to demonstrate scheme conformity in order to verify the status of land and ensure that the inspection is carried out at an appropriate level of depth.

### 4.3.1 Location of the sourcing area

The exact location of the biomass production area must be documented in a most accurate, up-to-date and verifiable way. The spatial boundaries can be provided by means of a polygon or similar verification of the area via field blocks, plots or parcels, or politically defined regions such as county, state or national borders.

#### 4.3.1.1 Polygon

The polygon must be drawn in geographic coordinates with a resolution of 20 metres for each individual point.

In connection with the creation of the polygon, it is also possible to approximate the actual shape of the field with a polygon (in the most basic case with a triangle) for reasons of practicality. The respective start and end points of these lines delineating the polygon satisfy the accuracy requirements for the individual points above. The approximation using a polygon can be created with relatively few points provided that the resulting field area does not deviate any more than 10% from the officially determined field area. The official area can be verified

by providing the application for the area-based premium, register entries or other similar documents.

If the geo-coordinates of the individual points are not available in table form, they can be identified on the basis of tools such as Google Earth in such a way that the individual points are positioned manually as location markers (distinct, unique points that mark the border of the property) and the results (geo-coordinates) read and documented for the location markers.

As another application option for the polygon, the entire area of an operation which can be used for forestry, including leased areas can be taken as a basis and then captured in a single polygon as long as there are no partial areas on the total area where biomass may not be harvested as defined in Directive (EU) 2018/2001 and its revised version.

#### 4.3.1.2 Plots, field blocks, parcels

If the forester or forest-owner already has other proof of the areas for field blocks, plots or parcels, including stands and tracts of land, that are similar to the polygon and identify the exact position of the area, these can also be used to document the location where the biomass is grown.

### 4.3.2 Forest before 1 January 2008

Forest biomass from land that had the status of natural- or semi-natural forest or plantation forests in January 2008 as defined by SURE is only considered to be scheme-compliant if this land still has status of forest after harvesting.

The following documents (examples, not exhaustive) can be used to prove<sup>4</sup> that the land was already used for forestry purposes before the cut-off date:

- ✓ official documents on the status of the land as of the cut-off date or conversion date
- ✓ certificates from contracted, independent verifiers or experts
- ✓ analyses and interpretations from remote sensing data and maps
- ✓ international, regional and local maps (e.g. land-use maps, site mappings, hydrological maps, vegetation maps, registry excerpts) or data
- ✓ operational protocols or harvesting protocols

### 4.3.3 Land with restrictions on biomass harvesting

Among the sustainability criteria established by the Directive (EU) 2018/2001 and its revised version is the limitation of the areas where forest biomass for biomass fuels may be harvested. This are contained in Article 29 paragraph 3, subparagraphs a, b, d and e and paragraph 4, subparagraph a of the RED III. The regulation identifies four groups of landscapes where restrictions on harvesting biomass apply: protected areas, land with high biodiversity value, wetland and peatland<sup>5</sup>. In the SURE-EU system, those landscapes are classified in two types, based on how restrictive the biomass harvesting conditions are:

- ✓ Type I: includes the areas where biomass may not be harvested under any circumstances, including also the prohibition of extracting biomass for land maintenance, and
- ✓ Type II refers to the areas where biomass may be harvested only if certain conditions can be proven.

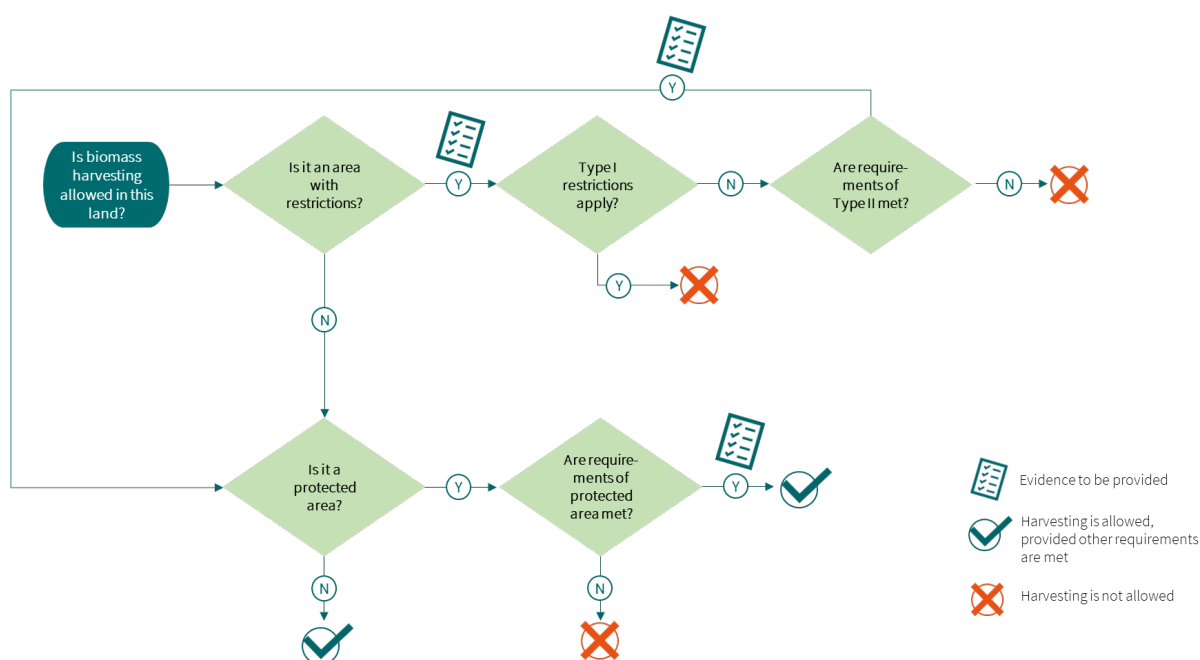
Figure 8 shows the classification of land based on the biomass harvesting restrictions.

		Land status			
		Land with high biodiversity value	Land with high carbon stock	Peatland	Protected areas
Harvesting restrictions	Type I	<ul style="list-style-type: none"> <li>- Primary and old-growth forest</li> <li>- Natural highly biodiverse grassland</li> <li>- Heathland</li> </ul>	Wetland		Protected areas that also have Type I restrictions (wetlands, primary and old-growth forest, natural grassland, heathland)
	Type II	<ul style="list-style-type: none"> <li>- Highly biodiverse forest</li> <li>- Non-natural highly biodiverse grassland</li> </ul>		Peatland	Other protected areas (e.g. non-natural grassland, peatland)

**Figure 8.** Classification of areas with restrictions to harvest forest biomass

NOTE: Land status defined in reference to January 2008. Definitions detailed in Sections 5.4, 5.5 and 5.6

Forest biomass producers must provide evidence that the forest biomass is not harvested on land where restrictions Type I apply, or that harvesting conditions are met where restrictions of Type II are in place. This is summarized in the flow chart in Figure 9 and in the document “Technical guidance for the identification of areas with restrictions on biomass harvesting”.



**Figure 9.** Process for identifying the prevailing restrictions to harvest biomass.

In any case, land status must be proved. The following are means to prove land status (non-exhaustive list):

- ✓ satellite imagery,
- ✓ official maps,
- ✓ land register extract,
- ✓ official classification,
- ✓ international databases, for example Natura 2000 viewer,
- ✓ reports from experts, to be checked as part of the audit,
- ✓ environmental impact assessments
- ✓ evidence that the forest where the biomass is harvested is older than 20 years old rules out the possibility of the land having the status of heathland or grassland.

The auditor must assess whether the evaluation of the status of the land is necessary. If the auditor deems the assessment of the status of heathland needed, it must be performed by an external and independent expert without any conflicts of interest with the activity being audited, who may be a member of the auditing team. The evaluation and the result must then be checked as part of the audit.

The requirements applicable to SURE auditors and experts are described in detail in the SURE document “Scheme principles for the certification process – Requirements and specifications”.

Detailed explanation and definitions of the land with restrictions on biomass harvesting is available in Sections 5.3 to 5.6 and in the document “Technical guidance for the identification of areas with restrictions on biomass harvesting”.

#### 4.3.3.1 Land within protected areas

Growing and harvesting biomass on land within protected areas where forestry management is permitted represents a unique case. The forestry operation has to document whether forestry management takes place within an area designated by authorities for nature protection, such as wetlands, grassland, heathland and peatlands.

Under RED III it must also be observed that the forest biomass is not sourced from areas with restrictions on biomass harvesting, i.e., land with high biodiversity value, wetland or peatland status (Figure 9). In that case, if the restrictions are Type I, harvesting is not allowed, even if the requirements of the protected area are met. If the restrictions are Type II, then the biomass producer has to proof simultaneously that nature conservation requirements have been met and also, the specific requirements of the Type II restrictions are complied with.

#### 4.3.3.2 Land with high biodiversity value

According to article 29 (3) of the Revised Directive 2018/2001 the category “land with high biodiversity value” encompasses primary and old-growth forest, highly biodiverse forest, highly biodiverse grassland and heathland. Harvesting restrictions apply on land that had any of those statuses in or after January 2008, whether or not the land continues to have that status. This means that, if at any point in time after January 2008 the land had any of those statuses, then the restrictions apply.

More information and definitions on land with high biodiversity value can be found in Section 5.4.

Within this category, there are Type I and Type II restrictions, as shown in Figure 8. Forest biomass may not be harvested in

- ✓ primary and old-growth forest,
- ✓ natural highly biodiverse grassland and
- ✓ heathland.

Forest biomass may be harvested in the following land only if certain conditions are met:

- ✓ highly biodiverse forest defined as such by authorities: it has to be demonstrated that the production of the biomass did not interfere with the nature protection purposes.

- ✓ non- natural highly biodiverse grassland: it has to be proved that the harvesting of the biomass is necessary to maintain the non- natural highly biodiverse grassland as such.

#### 4.3.3.3 Land with high carbon stock: Wetland

According to article 29 (4) of the Revised Directive 2018/2001 Biomass fuels made from forest biomass may not be made from raw material obtained from land with the status of wetland (Type I restriction). These restriction does not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.

Definition of wetland and further analysis on the restrictions to harvest biomass in wetlands is presented in Section 5.5.

#### 4.3.3.4 Peatland

According to article 29 (5) of the Revised Directive 2018/2001 Forest biomass maybe harvested in peatland as long as evidence is provided that the growing and harvest of this raw material did not require to drain land that was previously not drained (Type II restriction).

Definition and more details on restriction on harvesting biomass in peatlands is provided in Section 5.6.

### 4.4 Qualification of economic operators

All economic operators must have qualified (expert) personnel. Expertise means having at least knowledge of the legal basis regarding growing, harvesting, trading/distributing and transporting forest biomass (for more information, see Chapter 5 “Specific requirements for the production of forest biomass”).

Furthermore, qualifications in handling data relating to biomass, such as weighing data, registers and other data is indispensable (electronic records). Knowledge of permit law is an advantage, if relevant to the scope of duties.

Proof of expertise can be provided by the professional qualification. It can also be provided as part of an initial training plan or through successful participation in a relevant course or training.

Staff must be able to identify risks of potential non-conformities in their area of responsibility, take appropriate action in case of identified non-conformities and take precautions to prevent non-conformities.

## 4.5 Social responsibility

All participants in the SURE-EU system assume social responsibility and undertake to comply with at least Core Labour Standards of the International Labour Organisation (ILO<sup>6</sup>), based on the fundamental principles of

- ✓ freedom of association and collective bargaining
- ✓ elimination of forced labour
- ✓ abolition of child labour
- ✓ elimination of discrimination in respect of employment and occupation

which in turn are reflected in eight conventions and have been ratified by currently 139 states:

- ✓ ***Convention 87 concerning Freedom of Association and Protection of the Right to Organise, 1948***

Convention 87 concerning Freedom of Association and Protection of the Right to Organise of 1948 guarantees the right of workers and employers to form associations without previous authorisation. These organisations must have the right to draw up their constitutions and rules, to elect their representatives in full freedom, to organise their administration and activities and to formulate their programmes.

- ✓ ***Convention 98 concerning the Application of the Principles of the Right to Organise and to Bargain Collectively, 1949***

Convention 87 is supplemented by Convention 98 concerning the Application of the Principles of the Right to Organise and to Bargain Collectively, 1949. It calls for adequate protection of workers against any discrimination contrary to freedom of association in respect of their employment. This includes, in particular, acts calculated to make the employment of a worker subject to the condition that he shall not join a union or that cause the dismissal of a worker by reason of union membership or because of participation in union activities. The possibility of concluding collective labour agreements between employers or organisations of employers and organisations of employees to regulate pay and working conditions shall be encouraged.

- ✓ ***Convention 29 - Forced Labour, 1930***

Convention 29 on forced labour calls for the elimination of forced and compulsory labour as soon as possible, whereby forced and compulsory labour for the benefit of private individuals is completely prohibited, especially products in which they trade. If forced or compulsory labour cannot be eliminated immediately, it is subject to certain conditions and must be remunerated at the prevailing rates.

- ✓ ***Convention 105 concerning the Abolition of Forced Labour, 1957***

Convention 105 on the Abolition of Forced Labour adds that forced or compulsory labour shall not be used as a means of political coercion or education or as a punishment for holding views ideologically opposed to the established system, as a method of mobilising and using labour for purposes of economic development, as a means of labour discipline, as a punishment for having participated in strikes or as a means of racial, social, national or religious discrimination.

✓ ***Convention 100 concerning Equal Remuneration of Men and Women Workers for Work of Equal Value, 1951***

Convention 100 seeks to promote and, where possible, ensure equal pay for men and women for work of equal value.

✓ ***Convention 111: concerning Discrimination in Respect of Employment and Occupation, 1958***

According to Convention 111, all forms of discrimination must be eliminated. Discrimination means any distinction, exclusion or preference made on the basis of race, colour, sex, religion, political opinion, national extraction or social origin. It also includes any such other distinction, exclusion or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation.

✓ ***Convention 138 concerning Minimum Age for Admission to Employment, 1973***

Convention 138 on the minimum age is designed to ensure the effective abolition of child labour and to raise progressively the minimum age for admission to employment or work to a level consistent with the fullest physical and mental development of young persons. The minimum age for less developed countries is 14 years, otherwise 15 years, and 18 years for jobs that are likely to jeopardise the health, safety or morals of young persons. Considerable derogations from these principles are permitted, firstly for less developed countries, secondly for persons aged 14 years or over for training purposes and finally for persons aged 13 to 15 years who perform light work which is not likely to be harmful to their health or development or prejudice their attendance at school, their participation in vocational orientation or training programmes.

✓ ***Convention 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, 1999***

The most recent ILO core labour standard on child labour supplements Convention 138 and covers all persons under 18 years of age. States ratifying the Convention shall ensure that all forms of slavery and practices similar to slavery (such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour), the use, procuring or offering of a child for prostitution, for the production of pornography or for illicit activities, in particular for the trafficking of drugs, and work

which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children are prohibited and eliminated.

The social responsibility requirements of the scheme participant can be considered fulfilled if the country where the economic operator operates has ratified ILO core labour standards 29, 87, 98, 100, 105, 111, 138 and 182. An overview of the states that have ratified the ILO core labour standards is available on the ILO website<sup>7</sup>. This list is updated on a regular basis.

## 5 Specific requirements for the production of forest biomass

Economic operators producing forest biomass need to provide evidence that the requirements of the Revised Directive (EU) 2018/2001 and the SURE-EU system are complied with at the sourcing area level. These requirements are aligned with sustainable forest management principles. The following sections define these requirements for the production of forest biomass in detail, while a guidance for verifying these specific criteria in form of a non-binding and non-exhaustive list of means of verification is provided in annex I of this document.

### 5.1 Legal requirements for the harvest, transport and trade/distribution of forest biomass are complied with

The legality of biomass sourcing is an important criterion for assessing its sustainability, as illegal logging is often associated with deforestation, loss of biodiversity and the depletion of carbon stocks. Similarly, illegal logging and biomass harvesting is often associated with conflicts over ownership, land-use rights and resource use, and promotes corruption and in some cases even armed conflict.

Applicable laws and requirements, which the producer of forest biomass is obliged to comply with, therefore have to be observed by all economic operators who introduce forest biomass to the market. This includes all legislation on forest management as well as the harvest, trade/distribution and transport of forest biomass.

To evaluate the legality of the harvesting and mobilisation of forest biomass, a description of the relevant legal framework in the area where the biomass is produced is therefore helpful. This framework determines the legality of the economic operator's activities. Particular attention is to be paid to the regulation of ownership and land-use rights, to the harvest, trade/distribution and use of forest products and, in particular, to the sustainable management of the forests.

It should be noted, however, that the absence of a formal legal framework in the production area or the area of biomass use does not constitute an infringement of the legality of an economic activity, since an assessment of legality presupposes the existence of an appropriate legal basis. Harvest, trade/distribution or transport of biomass can therefore only be considered illegal if they violate (existing) applicable law.

Moreover, the concept of legality cannot be equated with sustainability. Although the characteristics of a product may be legal in the sense of national legislation, they may be at odds with the requirements for sustainability as per the principles of RED III. For example, a change in land use from forest to agricultural land may be permissible within the relevant legal framework, but would contradict the requirement for forest regeneration stipulated in the SURE-EU system.

Furthermore, higher-level interests may conflict with the legality of the harvest, trade/distribution or transport of forest biomass. This may include import restrictions or sanctions by supranational institutions such as the UN Security Council or the European Council or at national level, which oppose legal trade in forest biomass, provided that these are among the sanctioned products even if harvested legally. The legality of the international trade in forest biomass goods must therefore also be reviewed for existing restrictions, requirements or other sanctions.

In order to evaluate the harvest, trade/distribution and transport of forest biomass as legally compliant, producers of forest biomass need to ensure in the SURE-EU system the compliance of harvesting with the due diligence system defined in article 6 of Regulation (EU) No 995/2010 of the European Parliament and of the Council. That means, the economic operator shall use, maintain and regularly update a framework of procedures and measures providing access to the following information:

- ✓ The economic operator is the owner of the land and has the right to harvest, trade/distribute or transport the biomass from that land or can demonstrate without any doubt that the owner has transferred the right to harvest and use the biomass.
- ✓ The economic operator can clearly identify the area where the biomass is produced with geographical coordinates by means of a polygon or a comparable, unambiguous designation of the parcel of land, forest parcel, plot or similar.
- ✓ Species and type of biomass can be clearly identified by their scientific names.
- ✓ The quantity and harvest date of the harvested, traded/distributed or transported biomass are documented.
- ✓ For the harvest, trade/distribution or transport of domestic biomass, an official permit can be presented or it can be shown that this complies with national legislation.

- ✓ If forest biomass is imported, its harvest, trade/distribution or transport is not subject to sanctions or import restrictions.
- ✓ For the import or export of forest biomass, all necessary and correctly completed import and export permits and customs declarations can be submitted.
- ✓ All consignments to or services for other economic operators are contractually defined and the respective flow of goods is documented.
- ✓ The economic operator is aware of his legal obligations and requirements regarding harvest, trade/distribution and transport in the area where the forest biomass is produced.
- ✓ The economic operator applies risk mitigation procedures which consist of a set of measures and procedures that are adequate and proportionate to minimise effectively the risk of illegal harvest, trade/distribution and transport.

The following documents may serve as possible proof of the legality of the harvesting activity (non exhaustive):

- ✓ Laws, ordinances or other regulations in force in the relevant region at the time of the relevant activity, published in the Official Gazette or comparable federal media for formal announcements.
- ✓ Officially recognised proof or recognised certificates of compliance with the requirements of the EU Timber Regulation (Regulation 995/2010/EG)<sup>8</sup>.
- ✓ Officially recognised proof or recognised certificates of compliance with the requirements of the FLEGT licensing scheme for wood imports from partner countries (Regulation 1024/2008/EC)<sup>9</sup>.
- ✓ Officially recognised import declarations under the U.S. Lacey Act<sup>10</sup>.
- ✓ Officially approved import declarations under the Australian Illegal Logging Prohibition Act<sup>11</sup>.
- ✓ Officially recognised documents, permits or other documentation valid at the time of harvesting, for example related to ownership and land-use rights, logging permits, harvesting concessions, export permits etc.
- ✓ Official proof of payment, for example for logging permits or for the marketing of forest products, etc.
- ✓ Valid certificates of a voluntary scheme recognised by the EU Commission to demonstrate the legality of the use of forest biomass under Revised Directive (EU) 2018/2001 (RED III) or any other independent audit, provided that it meets requirements at least equivalent to those of the SURE-EU system.

## 5.2 International conventions are observed and complied with

Operators that harvest, trade/distribute or transport forest biomass must ensure that legislation based on international conventions is respected and complied with. These include in particular the Convention on Biological Diversity<sup>12</sup> (CITES) or the Washington Convention on International Trade in Endangered Species of Wild Fauna and Flora and the Paris Agreement.

### 5.2.1 Convention on Biological Diversity (CITES)

The *Convention on Biological Diversity* regulates trade in protected animal and plant species, regardless of whether they appear on the IUCN (International Convention for Conservation of Nature) Red List or the World Conservation Union. The list of protected species can be found in the appendices to the Convention and is updated by the member countries at the Conferences of the Parties. Depending on their potential risk, the species concerned are listed in Appendix I, II or III of CITES and, depending on the category, they are subject to specific import and export conditions and must meet certain requirements.

In the SURE-EU scheme, it must be ensured that the country of origin of the biomass has ratified the Convention on Biological Diversity and that CITES requirements are respected and complied with by economic operators.

Whether or not the country has ratified the Convention on Biological Diversity can be checked on the website of the *Convention on International Trade in Endangered Species of Wild Fauna and Flora*<sup>13</sup>.

A continuously updated list of threatened species and their classification in the relevant appendices is published on the CITES website<sup>14</sup> for comparison. For this purpose, the exact Latin name of the biomass is required.

The following requirements apply to CITES-listed biomass:

- ✓ Appendix I of the CITES Convention: Forest biomass listed in Appendix I of the CITES Convention may not be traded internationally for commercial purposes. In the SURE-EU system, it may not be used as a fuel for energy production, even domestically. Trade in offspring or non-commercial trade is possible provided that there is no threat to the survival of the species and national laws are complied with. Export and import licences for this biomass are mandatory.
- ✓ Appendix II of the CITES Convention: Commercial trade in biomass requires an assessment to be conducted by the country of export, certifying that the biomass is used sustainably without endangering the species. An export licence from the country where the forest biomass production area is located is mandatory.

- ✓ Appendix III of the CITES Convention: Forest biomass is considered an endangered species in one or more specific countries. These are listed in Appendix III and require an export licence from the country concerned. Biomass listed there from countries other than those listed in Appendix III requires a clear and complete proof of origin.

### 5.2.2 Paris Agreement

Economic operators in the SURE-EU system must document that the country of origin of the biomass has ratified the [Paris Agreement](#). The ratification of the Paris Agreement can be verified on the website of the *United Nations Treaty Collection*<sup>15</sup>.

If the Paris Agreement has not been ratified by the country of origin of the biomass, economic operators must provide evidence of carbon sequestration parity in the forest biomass sector as described in Section 5.10.

## 5.3 Areas designated for nature conservation purposes are protected

Based on Article 29 paragraph 6 of RED III, restrictions on biomass harvesting apply on areas that have been designated by law or by the competent authority for the purposes of nature conservation, including in wetlands, grassland, heathland and peatlands, and land that has been recognised by the Commission of the European Communities for the protection of rare, threatened or endangered ecosystems.

The various areas can be classified depending on their size, conservation function and conservation objectives.

The most important categories of protected areas are:

- ✓ Nature reserves
- ✓ National parks
- ✓ Biosphere reserves
- ✓ Landscape reserves
- ✓ Nature conservation parks
- ✓ Protected areas designated as NATURA 2000 sites

In the SURE-EU System, forest biomass may not be harvested in this land, unless evidence is provided that the production of the raw material did not interfere with the nature protection

purposes. This means that restrictions of Type II apply in this case, as explained in Section 4.3.3.

In addition to the use restrictions defined by law or authorities, under RED III it must also be observed that the forest biomass is not sourced from areas with restrictions on biomass harvesting. In the cases where Type I restrictions apply, biomass harvesting is not allowed even if the requirements of the protected area are met. In lands with Type II restrictions, both these restrictions and the protected area requirements have to be met, and demonstrated. Please refer to Figure 8 and Figure 9. Harvesting restrictions are also explained in detail in Sections 4.3.3.2 to 4.3.3.4 and 5.4 to 5.6.

The scheme participant in the SURE-EU system has to document whether forestry management takes place within an area serving the purposes of nature conservation and that nature conservation requirements have been met in the harvesting of the raw material for biomass. The following measures can serve as proof of compliance with nature conservation requirements (not exhaustive):

- ✓ inspection of compliance with nature conservation requirements by a certification body
- ✓ provision of an official document from the nature conservation authority responsible for the protected area
- ✓ similar confirmation by the competent authority as part of an inspection whereby the forestry operation has to be able to provide the authority with the contact people responsible and their telephone numbers
- ✓ international and national databases
- ✓ forest management plans, operational protocols, harvesting protocols, etc.
- ✓ satellite imaging or official maps
- ✓ environmental impact assessments
- ✓ official logging permits including conditions or restrictions ensuring that there is no conflict with the relevant nature protection objectives

## 5.4 The restrictions on harvesting Biomass from land with high biodiversity value are observed

As explained in Section 4.3.3, restrictions of different type apply on the harvesting of biomass for biomass fuels on land with high biodiversity value. In some cases, it is not possible to harvest forest biomass under any circumstances (Type I restrictions), while in others it is only possible if some requirements are met. The restrictions are expressed on Article 29 paragraph

3, subparagraphs a, b, d and e of the RED III. The following Sections detail these restrictions and provide examples of means to verify that the requirements for biomass harvesting are met, when corresponding (Type II restrictions).

#### 5.4.1 The forest biomass is not from primary forests nor from old growth forests

According to Article 29 paragraph 3, subparagraph a, biomass fuels produced from forest biomass may not be made from raw material obtained from land that was primary forest; other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forest in or after January 2008, whether or not the land continues to have that status. That means that Type I restrictions apply.

Primary forests are forests where native tree species grow and ecological processes are not significantly disturbed. There is also no clearly visible indication of human activity. **Old-growth forest** is defined as ‘A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes’<sup>16</sup>.

Some of the main characteristics of primary forests include natural forest dynamics, such as natural tree species composition, occurrence of deadwood, natural age structure and natural regeneration processes. The area is also large enough to maintain its natural ecological processes. Old-growth forests share most of these attributes. In addition, age characteristics are relevant in old-growth forests. The following criteria is of reference: (i) stands of trees reach on average half of the maximum longevity of the dominant species and (ii) some of the trees are already close to reaching the maximum longevity<sup>17</sup>.

Native tree species are tree species that grow within their natural growing range in places and under climate conditions to which they are adjusted through their natural evolution without human intervention. They are distinctive of primary forests but not necessarily of old-growth forests.

Native tree species do not include:

- ✓ tree species introduced into areas by humans where they never would have grown without human intervention

- ✓ tree species and/or cultivated species that would not have grown in these places or under these climate conditions without human intervention even if these places and/or climate conditions are still within the wider geographic growing range

Clearly visible indications of human activity are:

- ✓ economic use (e.g. wood harvest, forest clearance, land-use change)
- ✓ heavily fragmented by infrastructure (e.g. streets, power lines)
- ✓ disturbances of the natural biodiversity (e.g. significant presence of non-native plants and animal species)

Deadwood means all non-living woody biomass not contained in the litter, either standing, lying on the ground, or in the soil, including wood lying on the surface, coarse debris, dead roots, and stumps larger than or equal to 15 cm in diameter or any other diameter used by the country concerned.

Activities performed by indigenous populations and other traditional sections of the population whose livelihoods depend on the use of forest products who have a minor impact on the forested land (e.g. collection of wood and non-wood products, use of a small number of trees and small-scale clearance as part of traditional systems of use) are not considered clearly visible indications of human activity as long as the impact on the forest is minor.

The definitions of the country of origin of primary and old-growth forests should prevail. In case of absence of any local reference, the definitions here provided should be considered.

Forest biomass producers need to prove that the land where the biomass was harvested does not have the status of primary or old-growth forest. Examples of means to prove land status are described in Section 4.3.3. The auditor must assess whether the evaluation of the status of the forest is necessary, as detailed also in Section 4.3.3.

#### 5.4.2 The restrictions to harvest Forest biomass from land recognized as highly biodiverse forest

Based on Article 29 paragraph 3, subparagraph b of RED III, forest biomass may be harvested from land that has been identified by the relevant authority as highly biodiverse only if certain requirements are met (Type II restriction). These restrictions apply to land that had the status of highly biodiverse or other wooded land which is species-rich and not degraded in or after January 2008, whether or not the land continues to have that status. Raw material can only be harvested if it can be demonstrated that the production of this raw material has not compromised the conservation objectives.

The definitions of 'degraded' and 'species-rich' included in Commission Regulation (EU) No 1307/2014 shall be applied in the context of this criterion.

"Biological diversity" or "biodiversity" is defined by the Convention on Biological Diversity as:

*"variability among living organisms from all sources, (...); This includes diversity within species, between species and of ecosystems."*

Biological diversity is thus not limited to species of flora and fauna (animals, higher plants, mosses, lichens, fungi and microorganisms) per se. Many species are also further divided into sub-species and regional varieties and are divided into genetically different populations. Biodiversity therefore includes intra-species genetic diversity as well as the habitats of organisms and ecosystems. In simplified terms, biodiversity thus describes the levels "diversity of habitats", "diversity of species" and "genetic diversity within species".

Not degraded means not characterised by long-term loss of biodiversity due to for instance overuse, mechanical damage to the vegetation, soil erosion or loss of soil quality.

In the case of species-rich areas, this is:

- ✓ a habitat of significant importance to critically endangered, endangered or vulnerable species as classified by the International Union for the Conservation of Nature Red List of Threatened Species or other lists with a similar purpose for species or habitats laid down in national legislation or recognised by a competent national authority in the country of origin of the raw material
- ✓ a habitat of significant importance to endemic or restricted-range species
- ✓ a habitat of significant importance to intra-species genetic diversity
- ✓ a habitat of significant importance for globally significant concentrations of migratory species or congregatory species
- ✓ a regionally or nationally significant or highly threatened or unique ecosystem

Forests or wooded areas in the following regions of the European Union must, without exception, be considered highly diverse forests or wooded areas:

- ✓ Habitats listed in Annex I of Directive 92/43/EEC of the European Council
- ✓ Habitats with great significance for animal and plant species of Community (EU) interest (Annexes II and IV of Directive 92/43/EEC)
- ✓ Habitats of importance for wild birds listed in Annex I to Directive 2009/147/EC of the European Parliament and of the Council

Land that is considered highly biodiverse may be used for the production of raw materials whenever economic operators can provide evidence:

- ✓ that the harvesting of the raw material is necessary to preserve the highly biodiverse status or
- ✓ that management practices do not present a risk of causing biodiversity decline of the land.

This can be done through:

- ✓ check of compliance with the requirements for protected areas by a certification body
- ✓ provision of an official document from the authority responsible for the protected area
- ✓ similar confirmation by the competent authority as part of an inspection whereby the forest biomass producers have to be able to provide the authority with the contact people responsible and their telephone numbers
- ✓ Extract from designation of a protected area

A precautionary approach must always be taken when determining the potential biodiversity of forests and other wooded land. The auditor must assess whether the evaluation of biodiversity is necessary. If the auditor determines that an assessment of the status of forests and other wooded land is necessary, it must be performed by an external and independent expert without any conflicts of interest with the activity being audited, who may be a member of the auditing team. The evaluation and the result must then be checked as part of the audit.

The requirements applicable to SURE auditors and experts are described in detail in the SURE document “Scheme principles for the certification process – Requirements and specifications”.

### 5.4.3 The restrictions on harvesting forest biomass from highly biodiverse grassland are observed

Following Article 29 paragraph 3, subparagraph d of RED III, different types of restrictions on harvesting forest biomass on biodiverse grassland apply, depending on whether it is natural or non-natural, as showed in Figure 7. Biomass fuels from forest biomass may not be produced from raw material obtained from land that is larger than one hectare and that was highly biodiverse grassland in or after January 2008, whether or not the land still has that status (land with Type I restriction). Instead, Type II restrictions are in place for non-natural grassland that has been identified as highly biodiverse grassland in or after January 2008, whether or not the

land still has that status. In this case, forest biomass can be harvested, when compliance with certain conditions is proved.

According to Article 1 (1) of Regulation 1307/2014 (EU), grassland means terrestrial ecosystems dominated by herbaceous or shrub vegetation for at least five years continuously. It includes meadows or pasture that is cropped for hay but excludes land cultivated for other crop production and cropland lying temporarily fallow.

It also excludes continuously forested areas as defined in Article 29 (4)(b) of the Revised Directive (EU) 2018/2001, except in the case of agroforestry systems which include land-use systems where trees are managed in agricultural structures together with crop or livestock production systems. The predominance of herbaceous vegetation or shrubs means that their combined ground cover is greater than the canopy cover of trees.

Where grassland has already been converted to arable land and it is not possible to assess the characteristics of the land itself through information available from the national competent authorities or satellite imagery, the land is not considered highly biodiverse grassland before conversion.

Grassland in the following geographical areas of the European Union is considered highly biodiverse grassland with no exceptions:

- ✓ Habitats listed in Annex I of Directive 92/43/EEC of the European Council
- ✓ Habitats with great significance for animal and plant species of Community (EU) interest (Annexes II and IV of Directive 92/43/EEC)
- ✓ Habitats of importance for wild birds listed in Annex I to Directive 2009/147/EC of the European Parliament and of the Council

For all land which according to the above mentioned definition was grassland in January 2008 or has become grassland in the meantime, a distinction needs to be made between

- ✓ “natural highly biodiverse grassland” and
- ✓ “non-natural highly biodiverse grassland”

spanning more than one hectare, for which, among others, human intervention is an important factor.

Human intervention means managed grazing, mowing, cutting, harvesting or burning.

The European Commission may adopt implementing acts that further specify the criteria used to determine the type of grassland. Any updates will immediately enter into force in the SURE-EU system.

#### 5.4.3.1 Natural highly biodiverse grassland

In this context natural highly biodiverse grassland means grassland that:

- ✓ would remain grassland in the absence of human intervention
- ✓ maintains the natural species composition and ecological characteristics and processes

If such land is located in any of the geographic ranges listed in Article 2 of Regulation (EU) No 1307/2014, it is considered as being, or having been natural, highly biodiverse grassland.

For land that is located outside these areas, it must be determined whether the grassland maintains, or would have maintained the natural species composition and ecological characteristics and processes. Where that is the case, the land is considered as being, or having been, natural, highly biodiverse grassland.

No raw materials from land which is or was natural highly biodiverse grassland in or after January 2008 may be used for the production of solid or gaseous biomass fuels (Type I restrictions). Therefore, forest biomass producers have to prove that the land where the biomass was harvested did not have the status of natural highly biodiverse grassland in or after January 2008. The auditor must assess whether the evaluation of the status of grassland is necessary. Please refer to Section 4.3.3.

#### 5.4.3.2 Non-natural highly biodiverse grassland

Non-natural highly biodiverse grassland means grassland that:

- 1) would cease to be grassland in the absence of human intervention and
- 2) is not degraded *and*
- 3) has been identified as being highly biodiverse by the relevant competent authority *and*
- 4) is species-rich.

Species-rich in this context means

- ✓ a habitat of significant importance to critically endangered, endangered or vulnerable species as classified by the International Union for the Conservation of Nature Red List of Threatened Species, or
- ✓ a habitat of significant importance as classified by other lists with a similar purpose for species or habitats laid down in national legislation or recognised by a competent national authority in the country of origin of the raw material, or

- ✓ a habitat of significant importance to endemic or restricted-range species, or
- ✓ a habitat of significant importance to intra-species genetic diversity, or
- ✓ a habitat of significant importance for globally significant concentrations of migratory species or congregatory species, or
- ✓ a regionally or nationally significant or highly threatened or unique ecosystem

If the land is located outside protected areas listed in Article 2 of Directive (EU) 1307/2014, it is only high biodiversity grassland if all criteria listed under 1-4 are met.

#### 5.4.3.3 Use of the vegetation from highly biodiverse grassland

Land that is considered natural or non-natural high biodiversity grassland due to its geographical location within the protected areas listed in Article 2 of Regulation (EU) 1307/2014 or for any other reason listed above may be used for the production of raw materials whenever economic operators can provide evidence:

- ✓ that the harvesting of the raw material is necessary to preserve the highly biodiverse grassland status *and*
- ✓ that management practices do not present a risk of causing biodiversity decline of the grassland.

This can be done through:

- ✓ check of compliance with the requirements for protected areas by a certification body
- ✓ provision of an official document from the authority responsible for the protected area
- ✓ similar confirmation by the competent authority as part of an inspection whereby the forest biomass producers has to be able to provide the authority with the contact people responsible and their telephone numbers
- ✓ Extract from designation of a protected area

Where such evidence is unable to be provided, there must be proof that permission has been granted by the relevant competent authority, or designated agency, to harvest the raw material in order to preserve the highly biodiverse grassland status.

If the harvesting of raw material is not necessary to preserve the grassland status or the grassland has been converted e.g. to cropland used for the production of raw materials, it has to be established whether the grassland is or was highly biodiverse:

- ✓ If the land is located in the areas listed in Article 2 of Directive (EU) 1307/2014, the grassland is considered non-natural highly biodiverse grassland.

If the land is located outside these areas it must be determined according to the criteria laid down in Article 1(3) and (4) of Directive (EU) 1307/2014 whether the land is/was degraded and species-rich. If the land is not degraded and species-rich, or it was before being converted, it is considered non-natural highly biodiverse grassland. If the grassland is or was non-natural highly biodiverse grassland raw material from this area cannot be regarded as compliant with the sustainability criteria.

A precautionary approach must always be taken when determining the potential biodiversity of grassland. The auditor must assess whether the evaluation of highly biodiverse grassland is necessary.

- ✓ If the auditor determines that an assessment of grassland status is necessary, it must be performed by an external and independent expert without any conflicts of interest with the activity being audited, who may be a member of the auditing team. The evaluation and the result must then be checked as part of the audit.
- ✓ If the auditor does not consider it necessary to assess the biodiversity of the grassland, or if there is otherwise no evidence of information from the competent authorities on the biodiversity status of the grassland concerned, the grassland is not considered to be high biodiversity grassland prior to conversion.

The requirements applicable to SURE auditors and experts are described in detail in the SURE document “Scheme principles for the certification process – Requirements and specifications”.

#### 5.4.4 The forest biomass is not from heathlands

Based on Article 29 paragraph 3, subparagraph e of RED III, biomass fuels from forest biomass may not be produced from raw material obtained from land that had the status of heathland in or after January 2008, whether or not the land still has that status.

In the absence of a definition in the country of origin of the forest biomass, heathlands shall be defined as “*Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development*”<sup>18</sup>. Although heathlands are a heterogeneous ecosystem, in Europe they share some common attributes that allow to identify them<sup>19</sup>:

- ✓ In terms of species, there is a prevalence of *Calluna vulgaris*, *Erica spp.*, *Vaccinium spp.*, *Ulex spp.* among others (the list is not exhaustive).
- ✓ Soils are acidic, sandy or sandy-loam, poor in nutrients and freely-draining.

- ✓ Heathlands are present from lowlands to montane areas.

Evidence shall be provided that the land where the biomass was sourced did not have the status of heathland in reference to the cut-off date. In addition to the means listed in Section 4.3.3, the following are also relevant for heathland:

- ✓ providing proof that the sourcing area was a forest before January 2008,
- ✓ providing an official document from the authority responsible for assigning the status of heathlands, for example, Federal Agency for Nature Conservation (*Bundesamt für Naturschutz*) in Germany

An overview of the areas covered by heathlands in the European Union can be found in the Natura 2000 Viewer. Although information reported by this source is partial<sup>20</sup>, in this site it is possible to check the geographical localization of heathlands using the codes 4030 and 4020. In addition, the Viewer also reports since when the site is protected, which can be useful to contrast with the cut-off date.

The auditor must assess whether the evaluation of the status of heathland is necessary, as detailed in Section 4.3.3.

## 5.5 The forest biomass is not from wetlands

According to Article 29 paragraph 4 subparagraph a, biomass fuels made from forest biomass may not be made from raw material obtained from land that had the status of wetland in January 2008 and no longer has it. These provisions do not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008. This means that for wetlands Type I restrictions apply (Figure 7). Therefore, evidence has to be provided that the forest biomass was not harvested from land that was wetland in January 2008. Please refer to Section 4.3.3

Wetlands are land that is covered with or saturated by water permanently or for a significant part of the year. Wetlands include, in particular, swamps, marshes or bogs, as well as other bodies of water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water where the depth of which at low tide does not exceed six metres.

“Covered with water” means that water is visible on the surface as surface water.

The soil is “saturated by water” if it is completely inundated with water and, as a result, moisture is present at the surface but no shallow pools form.

This state is evident throughout the entire year for areas that are permanently covered or saturated by water.

This state is not evident throughout the entire year for areas that are covered or saturated by water for a significant part of the year. “A significant part of the year” means that the cover or saturation with water lasts for such a considerable part of the year that the dominant organisms have adapted to moisture or reduced conditions. This applies, in particular, to shallow water areas, coastal areas, swamps, bogs, fens and moors.

Retaining the wetland status also means that this state may not be actively changed or adversely affected. During the annual audit, an auditor must examine every change in the status of wetlands that has occurred within a year.

Forest biomass producers need to prove that the land where the biomass was harvested did not have the status of wetland. Examples of means to prove land status are described in Section 4.3.3. The auditor must assess whether the evaluation of the status of heathland is necessary, as detailed also in Section 4.3.3.<sup>^</sup>

## 5.6 Biomass from areas that were peatland are complied with

According to Article 29 paragraph 5, biomass fuels made from forest biomass may not be made from raw material obtained from land that was peatland in January 2008. An exception is possible if evidence is provided that

- ✓ the land was completely drained in January 2008 or
- ✓ the land has not been drained since January 2008.

Examples of means to provide evidence are (non-exhaustive list):

- ✓ Forest management plans approved by the competent authorities,
- ✓ operational protocols or harvesting protocols,
- ✓ official logging permits

This means that for peatland that was partially drained in January 2008 a subsequent deeper drainage, affecting soil that was not already fully drained, would constitute a breach of the criterion<sup>21</sup>.

Peat itself is not considered biomass.

Drainage is defined as a reduction of the average annual water level due to an increased water loss or a reduced water supply as a result of human activities or installations both inside and outside of an area.

Peatland that was already used for harvesting forest biomass before the cut-off date may be used for biomass cultivation as long as evidence is provided that the cultivation and harvest of this raw material did not require land to be drained that was previously not drained.

## 5.7 Biodiversity in forests is preserved or promoted and habitat destruction is prevented

According to the Convention on Biological Diversity, *biodiversity* or *biological diversity* means the “variability among living organisms from all sources. This includes diversity within species, between species and of ecosystems.” Biological diversity is thus not limited to species of flora and fauna (animals, higher plants, mosses, lichens, fungi and microorganisms) per se. Many species are also further divided into sub-species and regional varieties and are divided into genetically different populations. Biodiversity therefore includes intra-species genetic diversity as well as the habitats of organisms and ecosystems. In simplified terms, biodiversity thus describes the levels “diversity of habitats”, “diversity of species” and “genetic diversity within species”.

The preservation and promotion of biological diversity is an essential goal of sustainable forest management in order to preserve as many species as possible in their genetic diversity and in the diversity of their habitats.

Therefore, with the harvesting of forest biomass any potential risks to biodiversity and habitats shall be evaluated in advance and appropriate mitigation actions implemented. These mitigation actions may be proven by using international and national databases, official maps and satellite imaging, forest management plans, operational protocols, and harvesting protocols, results of relevant compliance audits and inspections.

Any forest biomass in the SURE-EU system must therefore meet the following requirements.

### 5.7.1 Biodiversity in natural and semi-natural forests or other wooded land is preserved or promoted

In forests, the composition of tree species has a decisive influence on biological diversity and characterises the forest as a habitat; the changes in the proportion of tree species (e.g. the proportion of dead wood or biotope wood per unit area) is an important indicator for the assessment of silvicultural strategy and ecological forest dynamics.

The production and use of biomass from natural or semi-natural forests and other wooded land is carried out in a way that minimises impacts on biodiversity features and habitats, including plants and animals protected under international or national legislation. That means

there is no biodiversity degradation in the regenerated forest area. A locally and ecologically appropriate quantity and assortments of deadwood is left in the forest and extraction of needles and leaves avoided, if appropriate.

The preservation of biodiversity in forests or other wooded land can be verified as follows (not exhaustive):

- ✓ by using forest management plans
- ✓ operational- or harvesting protocols
- ✓ by environmental impact assessments
- ✓ by results of relevant compliance audits and inspections
- ✓ international and national databases
- ✓ official maps and satellite imaging

### 5.7.2 The forest biomass of plantation forests contributes to preserving or promoting biodiversity in the production area

Forest plantations for timber production are not the ideal in terms of natural forest management, but they are highly productive, high-yield production areas and meet a large part of the global demand for wood. In this way, they help to reduce the pressure on natural forest areas and other ecosystems with high biological diversity.

Biological diversity is naturally much less pronounced in a managed *plantation forest*, where a uniform stand with trees of the same age is grown on narrowly defined plots of land until it is ready to be cut and then the entire area is harvested, than in natural forest (e.g. multi-aged or permanent forest). In a forest plantation, tree species, trunk thicknesses and age structures are largely predetermined due to the prevailing orientation towards a commercial forest that supplies wood for the mass market and large consumer structures. This logically leads to structural and species poverty.

Nevertheless, plantation forests can also contribute to preserving or promoting biodiversity in the sourcing area with a view to alternative uses of the land or a generally low level of biological diversity. It can be assumed that

- ✓ the ecological effects and the biodiversity of a perennial forestry plantation may be less pronounced compared to, for example, a permanent forest, however, they may be more advantageous than annual crops in agriculture
- ✓ forestry plantations established in regions with low biodiversity increase the diversity of species and habitats there and create new habitats for fauna and flora

- ✓ that conversely, in regions where land-use change is permitted (e.g. from forest to agricultural land), the closure of a forestry plantation can lead to a loss of biodiversity

The production of forest biomass in timber-producing forestry plantations is therefore permitted in the SURE-EU system if it is carried out in a responsible and sustainable manner in accordance with the criteria described in this document and, particularly, if it promotes or preserves the predominant biodiversity in the production area.

In the SURE-EU system it must be documented that

- ✓ the biomass of forestry plantations was not produced on land that had the status of primary or old-growth forest, natural highly biodiverse grassland, heathland or wetlands, under Revised Directive (EU) 2018/2001 or natural forest under the SURE-EU scheme in or after January 2008,
- ✓ the limitations to harvest biomass on land with the status of highly biodiverse forest, non-natural highly biodiverse grassland, peatland and protected areas are met,
- ✓ the management of the forestry plantation allows for differently structured habitats, e.g. by managing the area on a parcel-by-parcel basis, in the sourcing area, and
- ✓ biotope or habitat trees are protected and corridors for wildlife are created or maintained.
- ✓ a new forest is established in the same area within at least ten years after the harvesting

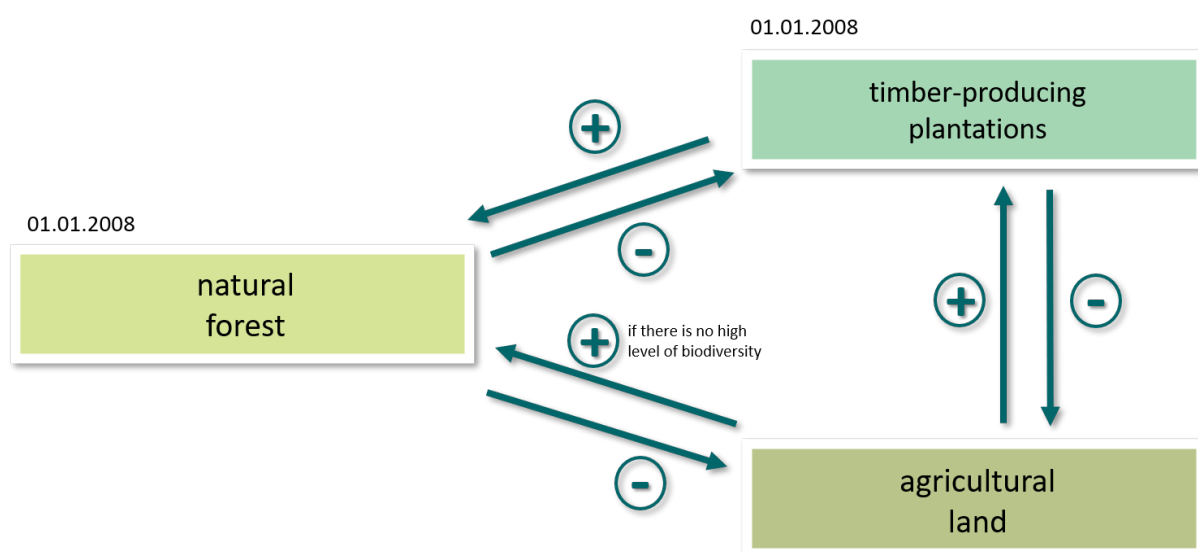
### 5.7.3 The forest biomass does not originate from areas that were forest in or after 1 January 2008 and no longer has the status

A *conversion* from natural forest to forestry plantations or a *change in use* from natural forest or forestry plantations to an area used for other purposes, e.g. agriculture, is not permitted in the SURE-EU system or is only permitted in exceptional cases subject to an official permit (under nature conservation and forestry law). This also applies to forests grown on abandoned land.

The management system of a forest may be changed from a forestry plantation to a natural forest.

Agricultural land, however, may be converted to forest (natural forest or plantation forest) (afforestation), provided that the requirements for agricultural biomass with regard to the preservation of biodiversity are satisfied and the carbon stock of the land is not negatively affected.

Natural forest or plantation forests may also be (re-)established on devastated or degraded land with low biodiversity if this is permitted under national legislation in the growing area.



**Figure 1:** Conversion of land (simplified diagram).

In the SURE-EU system it must be demonstrated that

- ✓ the biomass from plantation forests was not produced on land that had the status of natural forest according to the SURE-EU scheme during or after 1 January 2008, whether or not the land continues to have that status
- ✓ the forest biomass was produced on land (natural forest or plantation forests) which, even after harvesting, still has the status of forest

#### 5.7.4 Clear-cutting in the forest is minimized

Selective logging is preferred in the SURE-EU system. Clear-cutting in natural forests is only permitted if

- ✓ other silvicultural methods are not appropriate due to structures with very small parcels,
- ✓ conversion into a site-adapted tree stand or rejuvenation measures are not otherwise possible,
- ✓ it is necessary for compelling reasons of forest conservation or road safety,
- ✓ clear-cutting is carried out on the basis of a qualified clear-cutting plan and is subject to the control of a forestry management system which ensures the sustainability of the management of the area, in particular with regard to the conservation of biodiversity and forest regeneration,

- ✓ clear-cutting takes place on the basis of a permissible land use change or official approval, or
- ✓ it is temporarily justified due to documented forest pests, storms or other natural disturbances.

Permitted clear-cutting must be justified in the SURE-EU scheme and the environmental impact must be described. Clear-cut areas shall be immediately reforested, except for permitted and approved land use changes. On the clear-cut areas, storm-resilient retention trees (at least 5 - 10 retention trees per hectare as an average for the clear-cut area, ideally in groups) must be maintained, unless otherwise defined in the country where the forest is located.

Small-scale uses that serve the development of natural rejuvenation or the establishment of multi-stage stand sequences, and historical forest uses (coppice management) are not considered clear-cutting.

In timber-producing forestry plantations, clear-cutting as part of the management system is permitted up to a maximum area of 100 ha per parcel, unless otherwise defined in the country where the forest is located, provided that

- ✓ rejuvenation takes place immediately after harvesting and
- ✓ the immediately adjacent parcels have a perennial tree stand that contributes to structuring the landscape and diversifying habitats and
- ✓ corridors for wildlife are created or maintained.

### 5.7.5 Forest regeneration takes place exclusively with site-adapted tree species

Forest regeneration is carried out in a manner that at least maintains the quality and quantity of the harvested forest areas, which may be proven by providing evidence of the establishment of a new forest in the same area within a maximum of ten years after the harvesting.

When the harvested forest biomass results from final felling, clearcutting or selective logging, or from a calamity (such as storm, fire, or for phyto-sanitary reasons to prevent the spread of biotic pests and diseases) forest regeneration is always required and the goal is to establish site-adapted tree species in the forest.

Non-native tree species may be included, but may not displace native or endemic tree stands and other vegetation in the forest according to the SURE definition.

When biomass results from thinning or from the pruning of trees, forest regeneration is not required and considered automatically compliant. Thinning means a reduction of the number

of stems to give more space for the crowns of the main trees of interest to develop to maturity. This is undertaken while maintaining a maximum possible tree cover, not leading to forest degradation and instead ensuring quantity and quality of next generation forest resources.

Compliance can be verified by

- ✓ Forest management plans;
- ✓ Operational reports;
- ✓ Harvest protocols;
- ✓ Environmental Impact Assessments; and
- ✓ Results of relevant compliance audits and inspections.

#### 5.7.6 Endangered animal and plant species are protected

Special attention is paid to endangered animal and plant species in forest management. Biotope wood, such as wood or trees with nests or cavities, as well as rare tree and shrub species, are maintained and promoted to an appropriate extent in order to preserve biodiversity.

In the case of biomass harvests in plantation forests, the biodiversity in the area where the forest biomass is produced must be preserved or promoted. Corridors for wildlife must be created or maintained.

#### 5.7.7 Importance is attached to suitable seed and planting stock

The recommendations on the origin of forest seed and planting stock are complied with. Genetically modified organisms are not used.

### 5.8 Production of the biomass is ecologically responsible

Soil with an intact structure and nutrient balance is the basis of life and a habitat for animals, plants and microorganisms, which are indispensable for the development of healthy forests and plantation forests. The management of a forest or a forestry plantation, in particular the removal of wood and other biomass, has a direct impact on the soil and its nutrient structure.

In the SURE-EU system, it is important to ensure that particular attention is paid to maintaining soil quality and structure when harvesting forest biomass in order to maintain the long-term sustainable production capacity of the forest or forestry plantation. To that end, the relevant

risks associated with forest biomass harvesting shall be identified in advance. In addition, water resources must be used sustainably and groundwater must be protected.

### 5.8.1 The machinery in use does not damage the soil

Harvesting is carried out through logging systems minimizing impacts on soils quality, including avoiding soil compaction. That requires, that driving over the soil is adapted and does not harm the soil and also takes into account driving limitations caused by weather conditions, especially over soil susceptible to compaction. The following measures can be considered soil-conserving machine use in the SURE-EU system (list not exhaustive)<sup>22</sup>: low internal tyre pressure, low wheel load, if possible wide tyres, largest possible tyre diameter. Planning and logistics ensure that driving on the soil is kept to a minimum, and that extensive soil tillage that exposes the mineral soil and deep ploughing in the forest are avoided wherever possible.

Proof of compliance can be provided by (list not exhaustive):

- ✓ Forest management plans
- ✓ Operational- or harvesting protocols
- ✓ Results of relevant compliance audits or inspections

### 5.8.2 Soil nutrients, organic matter and soil structure are preserved

Producers must keep their land in good condition in forestry and environmental terms.

Unless otherwise duly justified by national, sub-national or local forest management guidelines, harvesting on vulnerable soils is to be avoided. When the sourcing area does comprise poor or vulnerable soils, then evidence needs to be provided that logging on such areas is implemented with the correct logging permit. Otherwise, confirmation of compliance with local guidelines or best practice guidelines regarding vulnerable soils through operational reports/harvest protocols has to be provided (e.g. justification of chosen harvesting system in respect of soil type and slope). Forest operations can also provide a report from qualified experts regarding soil vulnerability and possible harvesting systems endorsed with a statement that harvesting practices were implemented according to required standards.

The soil organic matter levels must be maintained by means of appropriate field tillage practices or restored in the event that the soil has been drained of nutrients.

Measures aimed at restoring depleted soils are only allowed on the basis of soil and/or forest nutrient expertise or sound site assessment in the SURE-EU system.

The SURE-EU system generally avoids the use of whole trees (especially the harvesting of stumps or roots), unless the rootstock needs to be removed for reasons other than to provide biomass fuel.

The use of crown material when using whole trees is only permitted after a site assessment of the soil nutrient balance. In nutrient-poor soils, the use of whole trees is not permitted. A whole tree should generally be used a maximum of four times in the life of the existing stock and not over a large area.

Information on the condition of the soils can be obtained from soil condition surveys<sup>23</sup> or comparable studies<sup>24</sup>. Further information may be provided by guidelines, recommendations or other publications of the competent authorities in the federal states.

### 5.8.3 Fertilisation to increase yield is not permitted

In the SURE-EU system, fertilisation with the aim of increasing the timber yield is not permitted. Crown fertilisation during growth, liming necessary for soil conservation or other compensation measures which serve to ensure the quality of the site or to restore the original quality of the site is not considered fertilisation to increase yield.

Soil-conserving liming and compensation measures to safeguard the quality of the site are only permitted on the basis of a soil and/or forest nutrient assessment or in-depth site investigation in the SURE-EU system.

### 5.8.4 The use of plant protection products is permitted only as a last resort

Plant protection products such as herbicides, insecticides or fungicides may only be used in forests as a last resort if the stand is endangered and alternative measures such as integrated pest management do not achieve the intended outcome.

The goal of integrated pest management (IPM) is to ensure that products are of high quality while minimising the use of pesticides and other chemical plant protection products. This goal is achieved through various preventative measures. It requires continuous monitoring and analysis of all conditions that affect plant growth.

Producers must keep proof of their IPM activities and assess their production processes in relation to integrated pest management processes.

Where the use of plant protection products is unavoidable, producers must follow the specific instructions of the manufacturer in their application.

Producers are not allowed to handle or apply plant protection products (PPP) that are not officially approved and registered for a specific target crop. This also explicitly includes local or temporary restrictions on application, e.g. in protected areas or in places where “incidents” have already occurred.

Producers must provide appropriate documentation including the results of monitoring for a particular plant disease and how often it occurs.

The records on the use of plant protection products must contain the following information:

- ✓ designation of the forest or plantation forest sites
- ✓ if necessary, a map in which the areas of application are identified
- ✓ documentation that a serious hazard existed
- ✓ if necessary, photo documentation of the initial situation
- ✓ description of why alternative methods (e.g. biological-technical protection) are not effective
- ✓ documentation of the preparation and its dosage
- ✓ date and method of application
- ✓ result of performance monitoring

They also have to provide information about the origin of the PPPs to ensure traceability (e.g. bills, shipping documents).

The producer must ensure that he himself and all employees involved in applying the PPPs have the knowledge necessary (expertise) for the respective activity pursuant to the law to protect crops (e.g. Crop Protection Act (PflSchG)).

Every individual who handles PPPs must have appropriate personal safety equipment.

The equipment used to apply the PPPs must be appropriate (i.e. accurate dosage and distribution of the PPPs) and it must ensure safe working conditions. There must be a process in place for regularly inspecting and calibrating this equipment.

Leftover approved PPPs or substances that are still in the possession of the producer after the approval has expired may not be applied to plants as a means of disposing of them. Just like the packaging for PPPs, they must instead be provided to appropriate and approved disposal facilities or returned to the manufacturer, who is generally required to take them back, for disposal.

### 5.8.5 Groundwater resources are protected

Producers may not discharge any dangerous substances contained in List I of Directive 80/68/EEC into the groundwater. In forestry production, this mainly involves substances such as products with a mineral oil basis and pesticides that explicitly contain toxic organic-chemical substances and substances with biological risk potential. Producers must also prevent indirect discharge of the dangerous substances contained in List II of Directive 80/68/EEC into the groundwater.

The disposal, use or storage of these types of substances must comply with the applicable legal regulations.

### 5.8.6 Existing water resources are managed sustainably

The existing water resources must be managed sustainably. In general, water must be protected against all forms of pollution and its natural resources preserved to ensure that enough water is supplied to meet the needs of humans, animals and crops.

Where irrigation/sprinklers (e.g. of forestry plantations or agroforestry systems) are required, proof of a license from the competent authorities and compliance with the relevant conditions must be provided. Documentation showing the amount of water used and the time period of irrigation must be kept and be available at any time.

No new drainage facilities are established.

## 5.9 The long-term production capacity of the forest is maintained or optimised

Secure demand for biomass fuels can help to generate permanent income for the sustainable management and maintenance of forests and thus encourage sustainable production methods geared to long-term biomass yields. Secure long-term income from forest management can help to prevent changes in land use caused by economic cycles.

The SURE-EU scheme must therefore ensure that the provision of biomass from forestry land does not affect the long-term production capacity of forests. Long-term production capacity means the ability of forest to continuously and sustainably deliver goods, such as wood of various quality grades, and non-wood-forest products and services, including air and water purification, maintenance of wildlife habitat, recreation or cultural capital, over a long period of time, and where applicable, bridging several successive forestry rotations.

The forest's long-term production capacity may be proven by providing evidence that the annual fellings do not exceed the net annual increment in the relevant sourcing area on average within the ten year period prior to the harvesting intervention, unless different amounts are duly justified in order to enhance the future production capacity of the forest; or because of documented forest pests, storms or other natural disturbance. That may be proven by using public or private forest inventory data.

Land-use changes from forest areas to other forms of use are not permitted in the SURE-EU system (see Section 5.7.3).

The following requirements therefore apply to ensure the long-term production capacity of the forest:

### 5.9.1 The forest is managed on the basis of targeted planning

The forest or plantation forest is maintained and managed systematically. This means that a calculation is made of the growth and stock build-up in the stand and the wood harvest is planned in advance with appropriate adjustments. Alternatively, in small to medium-sized stands (up to 100 ha), an estimate can be made using yield tables to calculate stock and growth.

By doing so, it needs to be ensured that annual felled timber amounts do not exceed net annual increment in the relevant sourcing area on average within the five-year period prior to the harvesting intervention, unless different amounts are duly justified in order to enhance the future production capacity of the forest; or because of documented forest pests, storms or other natural disturbance. That shall be proven for example by using public or private forest inventory data. Net annual increment means the annual growth in volume of the stock of living trees available minus the average natural mortality of that stock.

### 5.9.2 The forest is guaranteed to permanently remain a forest

The forest is guaranteed to retain its status as forest. After removal of an earlier stand, e.g. by felling, rejuvenation measures or due to natural causes (including fire, storm or other calamities), forest regeneration or reforestation is mandatory within ten years after harvesting at latest.

The end use of immature stands is, with a few exceptions, generally not permitted (for conifers: < 50 years, for deciduous trees: < 70 years). Exceptions are stands in plantation forests with shorter estimated rotation periods, shoot management in the context of coppicing or coppicing with standards practices, improvement cuttings and thinnings as well as measures for the conversion of low-yield or site-adverse stockings.

## 5.10 Guarantee of carbon sequestration parity in the forest biomass sourcing area

It must be ensured for biomass fuels from forest biomass that their sourcing area does not become a source of carbon as a result of the management activity.

In the SURE-EU scheme, forest biomass that has to be removed for reasons of forest hygiene due to calamities (storm, pest infestation, etc.) or other damaging events in the forest or on a forestry plantation and is used for energy purposes is considered CO<sub>2</sub> neutral in the SURE-EU scheme as long as it is ensured that the original condition is restored in the long term.

### 5.10.1 Proof of ratification of the Paris Agreement

If it can be documented that the sourcing area of the forest biomass is located entirely in a country that has ratified the Paris Agreement<sup>25</sup> and has submitted a nationally determined contribution<sup>26</sup> (NDC) that takes into account the agriculture, forestry and land-use sectors, it can be assumed that the carbon sequestration parity of the forest biomass is ensured by the applicable legal framework in the applicable sourcing area. In this case, proof of the carbon sequestration parity for forest biomass from these sourcing areas in the SURE-EU scheme is deemed to be provided.

If the Paris Agreement has been ratified by the country of origin of the forest biomass but no NDC has been submitted that takes into account the agriculture, forestry and land-use sectors, documentation of legislation aimed at maintaining or increasing carbon stocks and sinks in accordance with Article 5 of the Paris Agreement and providing evidence that emissions do not exceed removals on average over the ten years preceding the harvesting of the forest biomass and that carbon stocks and sinks are conserved or enhanced between the last two successive ten-year periods preceding the harvesting of forest biomass.

The ratification of the Paris Agreement can be verified on the website of the *United Nations Treaty Collection*. The submission of the NDC can be checked on the website *NDC Registry* and the relevant NDC can be downloaded to check the above items.

### 5.10.2 Proof of the determination of carbon stocks in the sourcing area

If the conditions for ensuring carbon sequestration parity as described in Section 5.10.1 are not met, the economic operator is required to provide evidence that the forest biomass sourcing area is not a source of greenhouse gases as a result of its use by using the methodology and requirements of Regulation 2018/841/EC of the European Parliament and of the Council of 30 May 2018 (on binding annual greenhouse gas emission reductions from land use, land-

use changes and forestry by 2030 contributing to climate action to meet commitments under the Paris Agreement and amending Regulation (EU) No 525/2013 and Decision No 529/2013/EC, hereinafter: LULUCF).

Proof can be provided by presenting a certificate from recognised (voluntary) schemes to verify carbon balances in forests or through own calculations based on the following methodology. All details must be plausible and transparent so that they can be verified during an audit. All information on data, sources and methods used must be readily available.

#### 5.10.2.1 Step 1: Spatial boundaries of the assessment area

The spatial boundaries of the area for which proof of carbon sequestration parity is to be provided must be clearly and exactly defined (see Section 4.3), whereby this must fully cover the biomass sourcing area. The area is to be located in the same administrative region (for example within a country) and the conditions of forest management and forest planning should be homogeneous enough to allow an assessment of the carbon stocks in the forest. The spatial boundaries of the assessment area may consist of several unconnected areas.

#### 5.10.2.2 Step 2: Definition of relevant carbon stores

For carbon sequestration parity, the carbon stocks and sinks in the assessment area as a whole must be maintained or increased. To this end, all relevant carbon stores must be taken into account in accordance with the UNFCCC:

- ✓ aboveground biomass
- ✓ belowground biomass
- ✓ deadwood
- ✓ soil organic carbon
- ✓ forest litter

#### 5.10.2.3 Step 3: Determination of a reference period in the past

The average forest carbon stocks and sinks have to be calculated over a historical reference period with the purpose of establishing a benchmark for the comparison of maintenance or strengthening of forest carbon stocks and sinks of a sourcing area. Economic operators shall use the reference period of 2000-2009, or another period of similar length and as close as possible to 2000-2009 to facilitate the use of forest inventory data or to mitigate the impacts of natural disturbances or other extreme events. The economic operators shall duly justify the choice of their reference period.

It is advisable to choose a reference period of about ten years, but shorter or longer periods can also be selected to improve data quality by using other data sources, for example forest inventory data. Very short reference periods should not be used to avoid an excessive impact of damaging events on carbon stocks.

The data on carbon stocks for the reference period must always be representative.

#### 5.10.2.4 Step 4: Description of forest management for the reference period

In order to quantify the carbon stocks for the sourcing area being assessed, it is necessary to describe the applied forest management practises (harvesting and thinning intensity, felling, age structure, etc.) for the reference period. The economic operator can demonstrate practical forest management during the reference period through information from forest inventories, forest management plans, forest planning or similar sources.

If data from these sources is not available, common forest management practices can be described for the sourcing area. These should be typical for the regional conditions in the sourcing area.

The following information describing forest management is to be provided:

- ✓ annual felling
- ✓ tree species composition
- ✓ age structure
- ✓ location
- ✓ forest reproductive material used
- ✓ thinning intensity
- ✓ type of management
- ✓ plant protection and fertilisation
- ✓ rotation periods
- ✓ conversion factors for calculating carbon stocks (wood density, carbon content, total biomass, etc.)

All information must be supported by current and reliable sources.

### 5.10.2.5 Step 5: Quantification of carbon stocks in the reference period

In order to demonstrate that carbon stocks and sinks have increased compared to the reference period, they must first be quantified for the reference period. For this, the economic operator shall estimate reference values for all relevant carbon pools individually identified pursuant to Section 5.10.2.2. The data required for this can be derived from the information in step 4 or from data from forest inventories, forest management plans and forest planning.

Carbon stocks are to be determined for all carbon stores (see step 2), although forest inventories, forest management plans or forest planning do not collect data for all carbon stores. If it is not possible to determine the data for individual carbon stores, the economic operator must provide plausible reasons for this and show that the carbon balance is not affected.

To determine the carbon stocks for the reference period, it may be helpful to divide the sourcing area being assessed into smaller units. When the sourcing area is divided into homogeneous subunits, the result for the carbon stocks is usually more accurate.

The following factors can be taken into account when dividing the sourcing area:

- ✓ differences in the administration of the sourcing area (region, state, municipality, etc.)
- ✓ type of ownership in the sourcing area (private, public, corporate, etc.)
- ✓ various site conditions
- ✓ forest characteristics (tree species composition, different forest management practices)

Instead of collecting own data, appropriate support programmes can be used to quantify carbon stocks for the reference period, taking into account the effect of management practices and timber increments on forest carbon stocks (list below is not exhaustive):

Name of the tool	Short description of the tool	Link
CO2FIX	<ul style="list-style-type: none"> <li>✓ Carbon stocks can be simulated at forest stand level</li> <li>✓ For carbon stocks, the following factors can be taken into account: above- and below-ground biomass, soil organic carbon content and storage in wood products</li> </ul>	<a href="http://dataservices.efi.int/casfor/models.htm">http://dataservices.efi.int/casfor/models.htm</a>
CBM-CFS3	<ul style="list-style-type: none"> <li>✓ Modelling of carbon stocks at the level of landscapes and forest stands</li> <li>✓ The tool takes into account all forest carbon stocks relevant to the Kyoto</li> </ul>	<a href="https://www.nrcan.gc.ca/climate-change/impacts-adaptations/climate-change-impacts-">https://www.nrcan.gc.ca/climate-change/impacts-adaptations/climate-change-impacts-</a>

	Protocol (above- and below-ground biomass, soil organic carbon, deadwood, litter)	<a href="https://forests/carbon-accounting/carbon-budget-model/13107">forests/carbon-accounting/carbon-budget-model/13107</a>
Soil carbon model - Yasso	<ul style="list-style-type: none"> <li>✓ Dynamic model for the simulation of the soil organic carbon cycle</li> <li>✓ Yasso quantifies soil organic carbon, its change and heterotrophic soil respiration</li> </ul>	<a href="https://en.ilmatieteenlaitos.fi/yasso">https://en.ilmatieteenlaitos.fi/yasso</a>
CASMOFOR	<ul style="list-style-type: none"> <li>✓ The tool calculates the amount of carbon sequestered by a forest ecosystem</li> <li>✓ Takes into account all relevant carbon stores in the forest (above- and below-ground biomass, soil organic carbon, deadwood, litter)</li> </ul>	<a href="http://www.scientia.hu/casmoform/index.php">http://www.scientia.hu/casmoform/index.php</a>
FORMIND	<ul style="list-style-type: none"> <li>✓ Simulates individual vegetation models based on the size in hectares</li> <li>✓ FORMIND can be used to simulate dynamic changes in forest structure</li> </ul>	<a href="http://formind.org/model/">http://formind.org/model/</a>

**Figure 10:** Support programmes that take into account the effect of management practices and timber growth on forest carbon stocks (non-exhaustive list)

#### 5.10.2.6 Step 6: Determining the future assessment period

The scenario of the expected forest management practices in a sourcing area needs to be described for a projected long-term period covering at least 30 years after the harvesting event from which biomass is sourced. That scenario shall be constructed on the basis of the forest management practices in a sourcing area documented for the historical reference period, or on existing forest management plans or other verifiable evidence.

#### 5.10.2.7 Step 7: Description of forest management for the assessment period

The planned forest management must be described for the future assessment period (see step 4 for the process). That scenario shall be constructed on the basis of the forest management practices in a sourcing area documented for the historical reference period, or on existing forest management plans or other verifiable evidence.

It is advisable to show whether forest management for the future assessment period differs from forest management in the reference period in the past. The effects of different forest management practices on the carbon stocks of the assessment area must be described.

All information must be supported by current and reliable sources.

#### 5.10.2.8 Step 8: Estimation of the average carbon stocks for the assessment period

The average carbon stocks and sinks of the sourcing area have to be estimated over the projected long-term period, covering at least 30 years depending on the forest growth rate, after the harvesting of the forest biomass. In order to ensure comparability with the historical reference period, the estimates shall use the same carbon pools, data and methods. Where economic operators are not able to quantify one or more of the pools identified pursuant to Section 5.7.7.2, they shall provide due justification.

Suitable support programmes can be used to quantify the carbon stocks in the assessment period, provided that they take into account the effects of forest growth and forest management on the carbon stocks and sinks in the sourcing area being assessed (see step 5 for procedure and data sources).

The progression and development of the carbon stores must be documented.

#### 5.10.2.9 Step 9: Comparison of future carbon stocks with past carbon stocks

The average carbon stock and sinks in the relevant forest sourcing area of the projected long-term period must be compared with the forest carbon stocks and sinks of the historical reference period. If the average forest carbon stocks and sinks of the projected long-term period are equal to or higher than the average forest carbon stocks and sinks of the historical reference period, the forest biomass is in compliance with the LULUCF criteria at the forest sourcing area level.

#### 5.10.2.10 Step 10: Monitoring the development of carbon stocks

The determination of the carbon stocks is associated with uncertainties regarding the assumptions made and the dynamic development of the carbon stocks in the assessment area. Actual forest development can deviate considerably from the modelled development, for example as a result of damaging events or changes in forest management.

The development of carbon stocks in the assessment area must therefore be regularly monitored and documented. If monitoring shows negative trends in carbon stocks in the assessment area, measures must be taken to counteract the negative trend.

In addition, forest restructuring as a result of climate change (e.g. by changing tree species) can lead to declining carbon stocks, but these serve to ensure carbon sequestration parity in the assessment area in the long term. In this case, the process for showing carbon sequestration parity in the assessment area must be adapted to the changed circumstances.

## 5.11 Calculation of greenhouse gas emissions

If forest biomass is used in installations to produce electricity or heat that are required to reduce greenhouse gas emissions or want to create a greenhouse gas balance on a voluntary basis, information on the greenhouse gas emissions associated with their production must be provided at the level of the forestry operations. Greenhouse gas emissions from forest biomass can be determined as follows, taking into account the requirements of Revised Directive (EU) 2018/2001<sup>27</sup>:

- ✓ on the basis of actual values
- ✓ using disaggregated default values
- ✓ using a combination of disaggregated and actual values

GHG emissions from the production of raw materials include GHG emissions from the cultivation and harvesting of raw materials, GHG emissions from the production of chemicals used in cultivation and other relevant substances and inputs, and are expressed in grams of CO<sub>2</sub> equivalent per kilogram dry matter of the raw material.

GHG emissions data must include accurate data on all relevant elements of the emission calculation formula (if relevant) under Revised Directive (EU) 2018/2001<sup>28</sup>.

A detailed description of the requirements for the calculation of greenhouse gas emissions can be found in the SURE document “Technical guidance for greenhouse gas calculation”.

## 6 Acceptance of other (voluntary) schemes for forest biomass and biomass fuels

If an economic operator wants to use biomass certified under another voluntary schemes, it shall only be recognised in the SURE-EU scheme if that voluntary scheme has been recognised in accordance with Article 30(4) of Revised Directive (EU) 2018/2001, only to the extent of the scope of their recognition. The same applies to national schemes recognised under Article 30(6) of Revised Directive (EU) 2018/2001.

## 7 Relevant documents

With regard to the documentation (scheme documents) in the SURE-EU system, reference is made here to the document “Scope and basic scheme requirements”.

SURE reserves the right to create and publish additional supplementary scheme principles if necessary.

The legal EU regulations and provisions for sustainable biomass and biomass fuels including other relevant references that represent the basis of the SURE documentation are published separately on SURE's website at [www.sure-system.org](http://www.sure-system.org). References to legal regulations always relate to the current version.

## 8 Reference

1

Heat or waste heat is also used to generate cooling with absorption chillers. “Heat” therefore also encompasses “cooling” or “refrigeration”, regardless of whether the end use of the heat is actual heating or cooling via absorption machines.

2

pursuant to **EUROPEAN COMMISSION (2023)**: Revised Directive 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (new version) to recast and repeal Directives 2009/28/EC, 2013/18/EU and 2015/1513/EU.

3

SURE uses the term inspection to mean an external review by the neutral certification body at the level of the biomass producer/waste and residue producer for group certification or the inspection of dependent operating sites. In contrast, SURE uses the term audit to mean an external review of the SURE requirements of interfaces or scheme participants by the neutral certification body.

4

SURE recommends documenting the status of land as of the cut-off date already in purchasing, leasing or management contracts by referencing suitable documents (see above). Simply stating the status in the contract is not sufficient as proof.

5

The criteria to classify the four groups of landscapes is the cut-off date against which the status of the land has to be proof by the operators.

6

An overview of all standards adopted by the ILO is available on its website at: <https://www.ilo.org/global/standards/lang--en/index.htm> (last accessed on 21.02.2025).

7

An overview of the countries that have ratified the ILO Core Labour Standards can be found at: [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:10011:0::NO::P10011\\_DISPLAY\\_BY,P10011\\_CONVENTION\\_TYPE\\_CODE:2,F](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:10011:0::NO::P10011_DISPLAY_BY,P10011_CONVENTION_TYPE_CODE:2,F) (last accessed on 21.02.2025).

8

**EUROPEAN COMMISSION (2010)**: EU Timber Regulation. Available at: [https://environment.ec.europa.eu/topics/forests/deforestation/eu-rules-against-illegal-logging\\_en#eu-timber-regulation](https://environment.ec.europa.eu/topics/forests/deforestation/eu-rules-against-illegal-logging_en#eu-timber-regulation) (last accessed on 21.02.2025).

9

**EUROPEAN COMMISSION (2008)**: FLEGT licensing scheme. Available at: [https://environment.ec.europa.eu/topics/forests/deforestation/eu-rules-against-illegal-logging\\_en#flegt-regulation](https://environment.ec.europa.eu/topics/forests/deforestation/eu-rules-against-illegal-logging_en#flegt-regulation) (last accessed on 21.02.2025).

10

**UNITED STATES DEPARTMENT OF AGRICULTURE (2020):** U.S. Lacey Act. Requirements available at: <https://www.aphis.usda.gov/plant-imports/file-lacey-act-declaration/requirements> (last accessed on 21.02.2025).

11

**AUSTRALIAN GOVERNMENT - FEDERAL REGISTER OF LEGISLATION (2012):** Australian Illegal Logging Prohibition Act. Available at: <https://www.legislation.gov.au/Details/C2012A00166> (last accessed on 21.02.2025).

12

**CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES) (2025):** Website. Available at: <https://www.cites.org/eng> (last accessed on 21.02.2025).

13

**CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES ON WILD FAUNA AND FLORA (CITES) (2025):** List of Contracting Parties. Available at: <https://www.cites.org/eng/disc/parties/chronolo.php> (last accessed on 21.02.2025).

14

**CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES ON WILD FAUNA AND FLORA (CITES) (2025):** The CITES Appendices I, II, III. Available at: <https://www.cites.org/eng/app/appendices.php> (last accessed on 19.02.2025).

15

On the website of the United Nations Treaty Collection, the United Nations (UN) publishes a list of the contracting parties to the Paris Agreement and the status of ratification, which can be used to verify the criterion: **UNITED NATIONS (2015):** Available at: [https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg\\_no=XXVII-7-d&chapter=27&clang=en](https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XXVII-7-d&chapter=27&clang=en) (last accessed on 19.02.2025).

16

**SWD(2023) 62 FINAL. COMMISSION GUIDELINES FOR DEFINING, MAPPING, MONITORING AND STRICTLY PROTECTING EU PRIMARY AND OLD-GROWTH FORESTS.** Extracted from Section 2.3.

17

**MOSSELER A, LYNDY JA, MAJOR JE (2003)** Old-growth forests of the Acadian Forest Region. EnvironRev 11:S47–S77.

18

**EU COPERNICUS.** <https://land.copernicus.eu/content/corine-land-cover-nomenclature-guidelines/html/index-clc-322.html> (last accessed on 21.10.2024).

19

**OLMEDA C., ŠEFFEROVÁ V., UNDERWOOD E., MILLAN L., GIL T. AND NAUMANN S. (COMPILERS). 2020.** EU Action plan to maintain and restore to favourable conservation status the habitat type 4030 European dry heaths. European Commission. <https://www.ecologic.eu/17537> (last accessed on 21.10.2024)

20

Only 40% of the heathlands area in Europe is part of Natura sites, according to **OLMEDA ET AL (2020).**

21

**EUROPEAN COMMISSION (2010):** Communication from the Commission on the practical implementation of the EU biofuels and bioliquids sustainability scheme and on counting rules for biofuels (2010/C 160/02)

22

according to the **KURATORIUM FÜR WALDARBEIT UND FORSTTECHNIK (ED.) (NO YEAR GIVEN):** Soil-conserving harvest of timber Final report on the FCK's commission to the KWF. Available at: [http://www.kwf-online.org/fileadmin/dokumente/Arbeitsverfahren/ag\\_Boden/Bodenschonende%20Holzernte\\_Abschlussbericht%20des%20KWF\\_web.pdf](http://www.kwf-online.org/fileadmin/dokumente/Arbeitsverfahren/ag_Boden/Bodenschonende%20Holzernte_Abschlussbericht%20des%20KWF_web.pdf) (last accessed on 20.02.2025)

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**JOHANN HEINRICH VON THÜNEN-INSTITUT (2025):** Soil condition survey. Available at: <https://blumwald.thuenen.de/bze/ergebnisse-der-bze> (last accessed on 20.02.2025).

24

**FEDERAL-STATE WORKING GROUP ENVIRONMENTAL MONITORING FOR FOREST (2020):** Website. Available at: <https://blumwald.thuenen.de/level-ii/auswertungen/boden/> (last accessed on 23.04.2020).

25

On the website of the United Nations Treaty Collection, the United Nations (UN) publishes a list of the contracting parties to the Paris Agreement and the status of ratification, which can be used to verify the criterion: **UNITED NATIONS (2015):** Available at: [https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg\\_no=XXVII-7-d&chapter=27&clang=en](https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XXVII-7-d&chapter=27&clang=en) (last accessed on 20.02.2025).

26

On its website under NDC Registry, the United Nations Framework Convention on Climate Change (UNFCCC) has compiled a list of all Parties that have submitted an NDC and which version has been submitted. **NDC REGISTRY :** Available at: <https://www4.unfccc.int/sites/NDCStaging/Pages/All.aspx> (last accessed on 20.02.2025).

27

- I EUROPEAN COMMISSION (2023):** Revised Directive 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (new version) to recast and repeal Directives 2009/28/EC, 2013/18/EU and 2015/1513/EU. Article 31 (1) to (31)(3) and Annex VI.
- II EUROPEAN COMMISSION (2010):** 2010/335/: Commission Decision of 10 June 2010 on guidelines for the calculation of land carbon stocks for the purpose of Annex V to Directive 2009/28/EC. Annex II.
- III EUROPEAN COMMISSION (2010):** Communication from the Commission on the practical implementation of the EU biofuels and bioliquids sustainability scheme and on counting rules for biofuels (2010/C 160/02), Annex II.
- IV EUROPEAN COMMISSION (2017):** Communication from the Commission “Note on the conducting and verifying of actual calculations of the GHG emission saving”. Available at: [https://ec.europa.eu/energy/sites/ener/files/documents/note\\_on\\_ghg\\_final\\_update\\_v2\\_0.pdf](https://ec.europa.eu/energy/sites/ener/files/documents/note_on_ghg_final_update_v2_0.pdf) (last accessed on 06.04.2020). The provisions listed here for biofuels apply to biomass fuels as well.

28

**EUROPEAN COMMISSION (2023):** Revised Directive 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (new version) to recast and repeal Directives 2009/28/EC, 2013/18/EU and 2015/1513/EU. Annex VI, Part B, No. 1

## Annex I: Guidance for verifying the specific criteria for the production of forest biomass at the forest sourcing area level

This guidance is intended to assist in verifying the specific requirements for the verification of compliance with the SURE scheme principles for the production of forestry biomass or biomass fuels at forest sourcing area level. The options listed are *neither binding nor exhaustive*, but are intended as examples. A detailed description of the requirements and how they can be implemented and proven is explained in the related SURE document “System Principles for the Production of Forest Biomass”.

In case the risk-based approach is applied (verification of compliance with the harvesting criteria at national or sub-national level), guidance is provided in the SURE document “Technical guidance for the assessment of the risk of unsustainable production of forest biomass”.

The numbering in the tables below refer to the SURE “Checklist for the production of forest biomass” to be consistent with the auditor checklist.

3 Specific requirements for the production of forest biomass	
3.1 Legality of harvesting, transport and use of forestry biomass is ensured	
Indicator	Means of verification
Can compliance with the due diligence requirements system defined in article 6 of Regulation (EU) No 995/2010 of the European Parliament and of the Council be proven?	<ul style="list-style-type: none"> <li>✓ Adequate and efficient due diligence as required under the EU Timber Regulation (EUTR, (EU) 995/2010) has determined negligible risk of illegal logging</li> </ul>
Can the economic operator document that he is the owner of the land and has the right to harvest, transport or trade the biomass or can he prove beyond doubt that he has transferred such rights?	<ul style="list-style-type: none"> <li>✓ Entry in the land register</li> <li>✓ Valid contracts (Lease contract, management contract, work contract, work order, transport / delivery contract, purchase contract, etc.)</li> <li>✓ Documentation showing legal ownership patterns in the region, level of enforcement, records of disputes over land tenure etc.</li> <li>✓ Records of payments</li> </ul>
On the basis of the available area certificates and documentation, there are no indications that the requirements of national legislation are not being met.	<ul style="list-style-type: none"> <li>✓ Defined special boundaries of the supply base (e.g. by means of a polygon, maps to the appropriate scale or similar verification of the area via field blocks, plots or parcels, or politically defined regions such as county, state or national borders)</li> <li>✓ Existing legislation</li> <li>✓ Forest management plans</li> </ul>

	<ul style="list-style-type: none"> <li>✓ operational protocols</li> <li>✓ Environmental impact assessments</li> <li>✓ Results of relevant compliance audits and inspections</li> </ul>
Can all necessary import or export licences and customs declarations be presented for the import or export of the biomass and is it ensured that trade is not subject to sanctions or import restrictions?	<ul style="list-style-type: none"> <li>✓ Import- or export licences</li> <li>✓ Customs confirmation</li> <li>✓ Sales contracts</li> </ul>
Are the quantity and harvest date of the forestry biomass properly documented?	<ul style="list-style-type: none"> <li>✓ Feedstock input records (including species and volumes)</li> <li>✓ Harvesting plans</li> <li>✓ Forest management plan</li> <li>✓ Contracts with companies</li> </ul>
Can the type and species of the harvested biomass be clearly identified by its scientific name?	<ul style="list-style-type: none"> <li>✓ Forest management plan</li> <li>✓ Purchase and supply contracts</li> <li>✓ List of species purchased</li> <li>✓ Harvesting planning</li> <li>✓ Work orders</li> <li>✓ Feedstock input records (including species and volumes)</li> </ul>
Are international conventions (e. g. the Convention on Biological Diversity (CITES)) respected and complied with?	<ul style="list-style-type: none"> <li>✓ List of species purchased</li> <li>✓ Purchase and supply contracts</li> <li>✓ Certificates of recognized forest management systems</li> <li>✓ Chain of Custody</li> <li>✓ Records of field inspections</li> <li>✓ Species in the supply chain</li> <li>✓ Interviews demonstrate that the CITES requirements are understood</li> <li>✓ CITES species are known and identified</li> <li>✓ Permits for harvest and trade in any CITES species</li> </ul>

### 3.2 Forest regeneration of the harvest area is guaranteed

Indicator	Means of verification
If the type of forestry biomass harvested requires forest regeneration, is the forest regeneration of the harvested area documented by the establishment of tree species appropriate to the location?	<ul style="list-style-type: none"> <li>✓ Forest management plan</li> <li>✓ Operational reports</li> <li>✓ Harvest protocols</li> <li>✓ Site reports for afforestation and conversion areas</li> <li>✓ Expert reports</li> <li>✓ Forest advisory protocols</li> <li>✓ Forest inventory</li> <li>✓ Publicly funded measures (linked to specifications)</li> <li>✓ Regional Best Management Practices</li> </ul>

	✓ Certificates of recognized forest management systems
<b>3.3 Areas designated for nature conservation are protected</b>	
Indicator	Means of verification
If the biomass originates from areas within protected areas, can it be documented that appropriate harvesting is permitted and that there are no indications that conditions of the designated area have not been met?	<ul style="list-style-type: none"> <li>✓ Inspection of compliance with nature conservation requirements by a certification body</li> <li>✓ Provision of an official document (e.g., harvesting permission) from the nature conservation authority responsible for the protected area including conditions or restrictions ensuring that there is no conflict with the relevant nature protection objectives</li> <li>✓ Confirmation by the competent authority as part of an inspection</li> <li>✓ International and national databases (e.g., IUCN World Database on Protected Areas (WDPA), UNESCO Biosphere Reserves, EEA database on Nationally Designated Areas (CDDA))</li> <li>✓ Official maps</li> <li>✓ Forest management plans, operational protocols, harvesting protocols, etc.</li> </ul>
<b>3.4 Areas where restrictions to harvest biomass apply</b>	
Indicator	Means of verification
Can it be ensured that the biomass does not originate from primary or old-growth forests?	<ul style="list-style-type: none"> <li>✓ Defined special boundaries of the supply base (e.g., by means of a polygon, maps to the appropriate scale or similar verification of the area via field blocks, plots or parcels)</li> <li>✓ International and national databases (e.g., IUCN World Database on Protected Areas (WDPA), UNESCO Biosphere Reserves, EEA database on Nationally Designated Areas (CDDA))</li> <li>✓ Official maps</li> <li>✓ Forest management plans, operational protocols, harvesting protocols, etc.</li> </ul>
Can it be ensured that the biomass complies with the requirements to harvest on highly biodiverse forest and other wooded land which is species-rich and not degraded?	<ul style="list-style-type: none"> <li>✓ Defined special boundaries of the supply base (e.g., by means of a polygon, maps to the appropriate scale or similar verification of the area via field blocks, plots or parcels)</li> <li>✓ International and national databases (e.g., IUCN World Database on Protected Areas (WDPA), UNESCO Biosphere Reserves, EEA database on Nationally Designated Areas (CDDA))</li> <li>✓ Official maps</li> <li>✓ Confirmation by the competent authority (when applicable)</li> <li>✓ Forest management plans, operational protocols, harvesting protocols, etc.</li> </ul>

Can it be ensured that the biomass does not originate from natural highly biodiverse grassland?	<ul style="list-style-type: none"> <li>✓ Defined special boundaries of the supply base (e.g., by means of a polygon, maps to the appropriate scale or similar verification of the area via field blocks, plots or parcels)</li> <li>✓ International and national databases (e.g., IUCN World Database on Protected Areas (WDPA), UNESCO Biosphere Reserves, EEA database on Nationally Designated Areas (CDDA))</li> <li>✓ Official maps</li> <li>✓ Confirmation by the competent authority / permission by the competent authority (when applicable)</li> <li>✓ External assessment, checked as a part of the audit.</li> <li>✓ Forest management plans, operational protocols, harvesting protocols, etc</li> </ul>
Can it be ensured that the biomass does not originate from heathland?	<ul style="list-style-type: none"> <li>✓ Defined special boundaries of the supply base (e.g., by means of a polygon, maps to the appropriate scale or similar verification of the area via field blocks, plots or parcels)</li> <li>✓ Confirmation that the sourcing area is a forest since before January 2008 through forest management plans, operational protocols, harvesting protocols, etc</li> <li>✓ External assessment, checked as a part of the audit.</li> <li>✓ International and national databases, e.g., Natura 2000 viewer.</li> </ul>
Can it be ensured that the biomass does not originate from wetland?	<ul style="list-style-type: none"> <li>✓ Defined special boundaries of the supply base (e.g., by means of a polygon, maps to the appropriate scale or similar verification of the area via field blocks, plots or parcels)</li> <li>✓ International and national databases (e.g., IUCN World Database on Protected Areas (WDPA), UNESCO Biosphere Reserves))</li> <li>✓ Official maps</li> <li>✓ Confirmation by the competent authority (when applicable)</li> <li>✓ Forest management plans, operational protocols, harvesting protocols, etc</li> </ul>
Can it be ensured that the biomass harvesting complies with the restrictions to harvest on peatland?	<ul style="list-style-type: none"> <li>✓ Defined special boundaries of the supply base (e.g., by means of a polygon, maps to the appropriate scale or similar verification of the area via field blocks, plots or parcels)</li> <li>✓ International and national databases (e.g., IUCN World Database on Protected Areas (WDPA), UNESCO Biosphere Reserves))</li> <li>✓ Satellite imaging</li> <li>✓ Official maps</li> <li>✓ Confirmation by the competent authority (when applicable)</li> </ul>

	<ul style="list-style-type: none"> <li>✓ Forest management plans, operational protocols, harvesting protocols, etc</li> </ul>
<b>3.5 Biological diversity is conserved or protected</b>	
Indicator	Means of verification
If the biomass was produced after 1 January 2008 on land with high biodiversity value, can it be demonstrated that biodiversity is not affected?	<ul style="list-style-type: none"> <li>✓ Inspection of compliance with biodiversity requirements by a certification body</li> <li>✓ Provision of an official document (e.g., harvesting permission) from the competent authority responsible for the area including conditions or restrictions ensuring that there is no conflict with the protection of highly biodiverse areas</li> <li>✓ Confirmation by the competent authority as part of an inspection</li> <li>✓ Assessment of potential impacts at operational level and of measures to minimise impacts</li> <li>✓ Regional Best Management Practices</li> <li>✓ Monitoring results</li> <li>✓ Defined special boundaries of the supply base (e.g., by means of a polygon, maps to the appropriate scale or similar verification of the area via field blocks, plots or parcels)</li> <li>✓ International and national databases (e.g., IUCN World Database on Protected Areas (WDPA), UNESCO Biosphere Reserves, EEA database on Nationally Designated Areas (CDDA))</li> </ul>
Can it be confirmed for biomass from natural or semi-natural forests that the requirements for clear cutting are met?	<ul style="list-style-type: none"> <li>✓ Forest management plans</li> <li>✓ Operational protocols</li> <li>✓ Harvesting protocols</li> <li>✓ Results of relevant compliance audits and inspections</li> </ul>
If the biomass originates from natural or semi-natural forests, can it be confirmed that the forest management aims to minimize impacts on biological diversity, degradation of biodiversity in the regenerated forest area is avoided and a locally and ecologically appropriate quantity and assortments of deadwood is left in the forest?	<ul style="list-style-type: none"> <li>✓ Forest management plans</li> <li>✓ Assessment of potential impacts on biodiversity at operational level and of measures to minimise impacts</li> <li>✓ Operational reports</li> <li>✓ Pre-harvest inventory</li> <li>✓ Post-harvest assessments</li> <li>✓ Regional biodiversity assessments</li> <li>✓ Regionally applicable best practices</li> <li>✓ Scientific recommendations</li> <li>✓ Interviews with related staff of forest operation</li> </ul>
If the biomass comes from forestry plantations, is it documented that the biodiversity in the area where the biomass is produced is at least maintained or promoted?	<ul style="list-style-type: none"> <li>✓ Forest management plans</li> <li>✓ Pre-harvest inventory</li> <li>✓ Post-harvest assessments</li> <li>✓ Assessment of potential impacts on biodiversity at operational level and of measures to minimise impacts</li> <li>✓ Operational protocols</li> <li>✓ Harvesting protocols</li> </ul>

	<ul style="list-style-type: none"> <li>✓ Results of relevant compliance audits and inspections</li> <li>✓ Scientific recommendations</li> <li>✓ Interviews with related staff of forest operation</li> </ul>
If the biomass originates from forestry plantations, can it be documented that the areas on which clear-cutting has taken place are not larger than 100 ha, neighbouring plots have a perennial tree population and corridors for wildlife are available?	<ul style="list-style-type: none"> <li>✓ Forest management plans</li> <li>✓ Results of relevant compliance audits and inspections</li> <li>✓ Regionally applicable best practices</li> <li>✓ Defined special boundaries of the supply base (e.g., by means of a polygon, maps to the appropriate scale or similar verification of the area via field blocks, plots or parcels)</li> </ul>
Does a plan for the protection of endangered animal and plant species exist for the extraction area of the forestry biomass or is a comparable strategy in place?	<ul style="list-style-type: none"> <li>✓ Pre-harvest inventory</li> <li>✓ Post-harvest assessments</li> <li>✓ Assessment of potential impacts at operational level and of measures to minimise impacts</li> </ul>
<b>3.6 Soil quality is maintained</b>	
Indicator	Means of verification
Are soil-conserving measures taken into account and implemented in the management of the area?	<ul style="list-style-type: none"> <li>✓ Forest management plans</li> <li>✓ Operational protocols</li> <li>✓ Harvesting protocols</li> <li>✓ Soil quality monitoring</li> <li>✓ Regionally applicable best practices</li> <li>✓ Results of relevant compliance audits and inspections</li> <li>✓ International or national databases (e.g., FAO/UNESCO Soil Map of the World, FAO Harmonized World Soil Database, national or regional soil maps)</li> <li>✓ Identification of poor or vulnerable soils in forest</li> <li>✓ Assessment of potential impacts on soil quality at operational level and of measures to minimise impacts (e.g., adopted machinery)</li> <li>✓ Interviews with related staff of forest operation</li> </ul>
Is the area managed according to a recognisable plan that reduces traffic to a minimum?	<ul style="list-style-type: none"> <li>✓ Forest management plans</li> <li>✓ Operational protocols</li> <li>✓ Harvesting protocols</li> <li>✓ Regionally applicable best practices</li> <li>✓ Results of relevant compliance audits and inspections</li> <li>✓ Interviews with related staff of forest operation</li> </ul>
Can the operation plausibly demonstrate which measures have been taken to maintain the land in good forest and environmental condition?	<ul style="list-style-type: none"> <li>✓ Assessment of potential impacts on soil quality at operational level and of measures to minimise impacts</li> <li>✓ Forest management plan</li> </ul>

	<ul style="list-style-type: none"> <li>✓ Results of relevant compliance audits and inspections</li> <li>✓ Regionally applicable best practices</li> </ul>
Can the operation prove that, in the case of full tree use, this has been done in accordance with a prior site assessment of the soil nutrient balance?	<ul style="list-style-type: none"> <li>✓ Forest management plans</li> <li>✓ Operational protocols</li> <li>✓ Harvesting protocols</li> <li>✓ Identification of poor or vulnerable soils in forest</li> <li>✓ Assessment of potential impacts on soil quality at operational level and of measures to minimise impacts</li> </ul>
Can the operation demonstrate that whole-tree use for the sole purpose of providing biomass fuels is excluded?	<ul style="list-style-type: none"> <li>✓ Operational post-harvest reports (including a confirmation that local best practice guidelines or relevant legislation regarding soil protection during harvesting operations are complied with)</li> <li>✓ Monitoring reports</li> <li>✓ Regionally applicable best practices</li> </ul>
In the case of soil protection liming and other compensation measures to safeguard the quality of the site, are these carried out on the basis of a soil or forest nutritional expert opinion or similar?	<ul style="list-style-type: none"> <li>✓ Scientific recommendation</li> <li>✓ Soil monitoring reports</li> <li>✓ Official permit</li> <li>✓ Soil condition survey</li> </ul>
Can it be confirmed that there are no recognisable signs of yield-increasing fertilisation in the area where the biomass is produced and can no signs of fertilisation be found in the documentation?	<ul style="list-style-type: none"> <li>✓ Legal framework in the area of the supply base</li> <li>✓ Records and documentation of forest operation</li> <li>✓ Interviews with staff of forest operation</li> <li>✓ Forest management plan</li> <li>✓ Operational protocols</li> </ul>
<b>3.7 A long-term production of the forest is maintained</b>	
Indicator	Means of verification
Does a management plan or other equivalent instrument exist for the sourcing area to record increment and stockpiling in the forest or forestry plantation and to plan timber harvesting accordingly to ensure ensured that annual felled timber amounts do not exceed net annual increment in the relevant sourcing area on average within the five-year period prior to the harvesting intervention?	<ul style="list-style-type: none"> <li>✓ Forest management plan</li> <li>✓ Documentation of inventory, growth data, yield calculations and harvesting records</li> <li>✓ Yield tables</li> <li>✓ Forest inventory</li> <li>✓ Operational protocols,</li> <li>✓ Confirmation of competent authority</li> <li>✓ Purchase and supply contracts</li> <li>✓ Official data for net annual increment in sourcing area</li> <li>✓ Forest growth models</li> <li>✓ Permits or documents including reports by the competent authority</li> </ul>

Is forest regeneration after harvesting of forest biomass carried out with tree species appropriate to the location?	<ul style="list-style-type: none"> <li>✓ Forest management plan</li> <li>✓ Operational protocols</li> <li>✓ Regionally applicable best practices</li> <li>✓ Results of relevant compliance audits and inspections</li> </ul>
When harvesting the biomass, is attention paid to the maturity of the stocks or are appropriate exceptions documented?	<ul style="list-style-type: none"> <li>✓ Forest management plan</li> <li>✓ Harvesting protocols</li> <li>✓ Operational protocols</li> <li>✓ Results of relevant compliance audits and inspections</li> </ul>
<b>3.8 Responsible handling and application of plant protection products</b>	
Indicator	Means of verification
Can the operation provide evidence of activities in the sense of integrated pest management?	<ul style="list-style-type: none"> <li>✓ Integrated pest management strategy</li> <li>✓ Monitoring report</li> <li>✓ Disease risk assessment including preventive measures</li> <li>✓ Operational protocols</li> </ul>
Is the cultivation of the area carried out according to the currently valid principles and best available technology of integrated plant protection?	<ul style="list-style-type: none"> <li>✓ Forest management plan</li> <li>✓ Operational protocols</li> <li>✓ Scientific recommendation</li> <li>✓ Results of relevant compliance audits and inspections</li> <li>✓ Regionally applicable best practices</li> </ul>
Can it be seen that only authorised plant protection products are used and that the relevant areas of application (crop and harmful organism) and the specified application rules are observed?	<ul style="list-style-type: none"> <li>✓ Existing legislation</li> <li>✓ Official approval of plant protection product in use</li> <li>✓ Operational protocols (including confirmation that local or temporary restrictions on application were considered)</li> <li>✓ Documentation about the type of crop, time, area, type and quantity of PPP application</li> <li>✓ Records about the origin of plant protection products</li> </ul>
Can suitable records be kept of the plant protection products used depending on the type of crop (type, quantity, application date, area of application, reasons for application, etc.) and are they complete?	<ul style="list-style-type: none"> <li>✓ Documentation of plant protection products used, including records about type of PPP and type of crop, quantity, date of application, area of application, justification for application)</li> <li>✓ Operational protocols</li> </ul>
Are all users appropriately trained and knowledgeable?	<ul style="list-style-type: none"> <li>✓ Proof of competence and expertise</li> <li>✓ Training certificates</li> <li>✓ Interview with related staff of forest operation</li> </ul>
Is suitable protective clothing available for the employees concerned?	<ul style="list-style-type: none"> <li>✓ Records of purchase invoices</li> <li>✓ Records of the issue of protective clothing</li> <li>✓ Inspection of equipment</li> </ul>

	<ul style="list-style-type: none"> <li>✓ Procurement contracts</li> <li>✓ Interviews with staff of forest operation</li> </ul>
Are the plant protection products only applied with suitable spraying equipment and are the devices regularly checked and calibrated?	<ul style="list-style-type: none"> <li>✓ Inspection protocols</li> <li>✓ Inspection of equipment</li> <li>✓ Calibration protocol</li> <li>✓ Interviews with staff of forest operation</li> </ul>
Is direct discharge into surface waters avoided when plant protection products are used?	<ul style="list-style-type: none"> <li>✓ Identification of surface waters</li> <li>✓ Risk assessment and documentation of preventive measures</li> <li>✓ Maps sufficient special resolution</li> </ul>
Does the handling of pesticide residues and packaging comply with the applicable national or regional regulations?	<ul style="list-style-type: none"> <li>✓ Records of disposal of leftovers or packaging</li> <li>✓ Proof of receipt of disposal facility or manufacturer of plant protection products</li> </ul>
<b>3.9 Water resources are sustainably managed, groundwater resources protected</b>	
Indicator	Means of verification
Are the substances referred to in List I and List II of Directive 80/68/EEC handled in the stand in such a way that there are no direct or indirect discharges into groundwater?	<ul style="list-style-type: none"> <li>✓ Risk assessment and documentation of preventive measures</li> <li>✓ Operational records</li> <li>✓ Results of relevant compliance audits and inspections</li> <li>✓ Regionally applicable best practices</li> </ul>
Is there proper disposal of the substances referred to in List I and List II of Directive 80/68/EEC, so that there is no reason to fear that there is any risk to groundwater?	<ul style="list-style-type: none"> <li>✓ Records of disposal of leftovers or packaging</li> <li>✓ Proof of receipt of disposal facility or manufacturer of plant protection products</li> </ul>
In the case of natural watercourses in the sourcing area, are necessary erosion control measures in place?	<ul style="list-style-type: none"> <li>✓ Identification of natural watersources</li> <li>✓ Risk assessment and documentation of preventive measures</li> <li>✓ Maps sufficient special resolution</li> </ul>
In the event that irrigation measures, such as in forestry plantations, and where water is taken from groundwater or surface water, does the measure require an official permit or is it in accordance with the applicable specialised legislation in the sourcing area?	<ul style="list-style-type: none"> <li>✓ Existing legislation</li> <li>✓ Official permit from competent authority</li> <li>✓ Results of relevant compliance audits and inspections</li> <li>✓ Regionally applicable best practices</li> </ul>

4 Balanced carbon stocks	
4.1 Ensuring compliance with LULUCF criteria	
Indicator	Means of verification
Can the operation document in a comprehensible manner either by proofing compliance on national level or by using the methodology and requirements of Regulation (EU) 2018/841 (LULUCF), that their sourcing area does not become a source of carbon as a result of the harvest operation?	<ul style="list-style-type: none"> <li>✓ United Nations list of parties to the Paris Agreement</li> <li>✓ UNFCCC NDC Registry</li> <li>✓ Existing legislation on national or sub-national level</li> <li>✓ Results of relevant compliance audits and inspections</li> <li>✓ Calculation tools</li> <li>✓ Forest management plan</li> <li>✓ Forest inventory</li> <li>✓ International or national databases (e.g., IPCC 2013 Revised Supplementary Methods and Good Practice Guidance Arising from the Kyoto Protocol)</li> <li>✓ Complete documentation of own calculation</li> </ul>

## Annex II: About the ‘Level A’ and ‘Level B’ approach

Directive (EU) 2018/2001 and its revised version define two approaches to prove the sustainability of the forest biomass: the risk-based approach, known as ‘Level A’ and the audits in the sourcing area, known as ‘Level B’.

Under the SURE EU system, the sustainability requirements that apply both for the audits in the sourcing area and for the risk-based approach are consistent. These are detailed in Chapter 5 of this document.

The difference between one approach and the other are the means of verification of scheme conformity. As explained in section 4.1 of this document, under the ‘Level B’ approach, conformity is verified through third-party audits at the sourcing area. Under the ‘Level A’ approach, when the risk assessment results in a ‘low risk’ evaluation, there are three possibilities to verify compliance: first-party audit, second-party audit or sample checks. If the result of the risk assessment is that there is a specified risk, then all producers have to be inspected. The document ‘Technical guidance for the assessment of the risk of unsustainable production of forest biomass’ explains the Risk-based assessment approach in detail.

The document ‘Checklist for forest biomass producers’ has been developed taking into account the specificities of each approach, i.e. the checklist contains the specific means of demonstrating compliance under the ‘Level A’ or ‘Level B’ approach.

In the following paragraphs we indicate, for each requirement in the legal text of Directive (EU) 2018/2001 and its revised version, where it is addressed in the SURE EU documents.

### Level ‘A’ approach

Legal text Directive (EU) 2018/2001 and revised version	SURE EU document (*)
<b>Article 29 6.</b> <i>Biofuels, bioliquids and biomass fuels produced from forest biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 shall meet the following criteria to minimise the risk of using forest biomass derived from unsustainable production:</i> <b>(a)</b> <i>the country in which forest biomass was harvested has national or sub-national laws applicable in the area of harvest as well as monitoring and enforcement systems in place ensuring:</i>	
(i) <i>the legality of harvesting operations;</i>	SSP Forest Section 5.1  TG RA Section 1, 5.4  CL Item No 3.1.1
(ii) <i>forest regeneration of harvested areas;</i>	SSP Forest Section 5.7.5, 5.9.2

	<p>TG RA Section 1, 5.5</p> <p>CL Item No 3.2.1</p>
<p><i>(iii) that areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grassland, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction;</i></p>	<p>SSP Forest Section 4.3.3.1, 5.3</p> <p>TG RA Section 1, section 5.8</p> <p>TG HR section 2.4</p> <p>CL Item No 3.3.1</p>
<p><i>(iv) that harvesting is carried out considering maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats;</i></p>	<p>SSP Forest Section 5.2, 5.7, 5.8</p> <p>TG RA Section 1, 5.6, 5.7</p> <p>CL Item No 1.7.1, 3.4.1, 3.5.1, 3.7.1, 3.8.1</p>
<p><i>(v) that harvesting maintains or improves the long-term production capacity of the forest;</i></p>	<p>SSP Forest Section 5.9</p> <p>TG RA Section 1, 5.10</p> <p>CL Item No 3.6.1</p>
<p><i>(vi) that forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in paragraph 3, points (a), (b), (d) and (e), paragraph 4, point (a), and paragraph 5, respectively under the same conditions of</i></p>	<p>SSP Forest Section 4.3.3, 5.4, 5.5, 5.6</p> <p>TG RA Section 1, 5.9</p>

determination of the status of land specified in those paragraphs; and	TG HR section 2.1, 2.2, 2.3
(vii) that installations producing biofuels, bioliquids and biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi) of this subparagraph.	SSP Forest Section 4.1.3  TG RA Section 1, section 2.2, 4.4.1  SSP USE section 4.1  CL Item No 3.12.1

### Level 'B' approach

Legal text Directive (EU) 2018/2001 and revised version	SURE EU document (*)
<b>Article 29 6.</b> Biofuels, bioliquids and biomass fuels produced from forest biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 shall meet the following criteria to minimise the risk of using forest biomass derived from unsustainable production: <b>(b)</b> when evidence referred to in point (a) of this paragraph is not available, the biofuels, bioliquids and biomass fuels produced from forest biomass shall be taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 if management systems are in place at forest sourcing area level ensuring:	
(i) the legality of harvesting operations;	SSP Forest Section 5.1  CL Item No 3.1.2
(ii) forest regeneration of harvested areas;	SSP Forest Section 5.7.5, 5.9.2  CL Item No 3.2.2
(iii) that areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grassland, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes;	SSP Forest Section 4.3.3.1, 5.3  TG HR section 2.4  CL Item No 3.3.2
(iv) that harvesting is carried out considering maintenance of soil quality and biodiversity, in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as	SSP Forest Section 5.2, 5.7, 5.8  CL Item No 1.7.1, 3.4.2, 3.5.2, 3.7.2, 3.8.2

<p><i>defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats; and</i></p>	
<p><i>(v) that harvesting maintains or improves the long-term production capacity of the forest.</i></p>	<p>SSP Forest Section 5.9</p> <p>CL Item No 3.9.2</p>

(\*) NOTES:

SSP Forest: Scheme principles for the production of forest biomass

SSP Use Scheme principles for use, processing and distribution/trade of biomass fuels and their conversion to electricity and heat

TG HR: Technical guidance Areas with harvesting restrictions

TG RA: Technical guidance for the assessment of the risk of unsustainable production of forest biomass

## Annex III: Revision Information

### Revision Information Version 3.0

Section	Change	Date of change
Whole document	Version 2.0 updated to 3.0	20.05.2025
Whole document	Correction of minor typos	20.05.2025
Whole document	Updated reference to Revised Directive (EU) 2018/2001 (RED III)	20.05.2025
Section 1	<p>Directive (EU) 2018/2001 (RED II) sets political targets for the EU member states [...]</p> <p><b>changed to:</b></p> <p>Directive (EU) 2018/2001 (RED II) and Revised Directive (EU) 2018/2001 (for short RED III) set political targets for the EU member states [...]</p>	20.05.2025
Section 2	<p><b>added:</b></p> <p>Wastes and residues that are directly generated by forestry are considered forest biomass under Revised Directive (EU) 2018/2001.</p>	20.05.2025
Section 3	<p>Sections 3.1 to 3.5 of previous version deleted. All definitions included in the System document “Definitions in the SURE-EU System” and deleted here</p> <p><b>added:</b></p> <p>In first place, “forest biomass” is defined as biomass produced from forestry in RED III.</p>	20.05.2025
Section 3.2	<p>In the SURE-EU system, a planted forest that is intensively managed and meets, at planting and stand maturity [...]</p> <p><b>changed to:</b></p> <p>In the SURE-EU system and in line with Article 2, point (11), of Regulation (EU) 2023/1115 of the European Parliament and of the Council, a planted forest that is intensively managed and meets, at planting and stand maturity [...]</p>	20.05.2025
Section 3.4	<p><b>added:</b></p> <p>Sourcing area</p> <p>Under RED III and in the SURE-EU system, “sourcing area” refers to the geographically defined area from which the forest biomass feedstock is sourced, from which reliable and independent information is available and where conditions are sufficiently homogeneous to evaluate the risk of the sustainability and legality characteristics of the forest biomass.</p>	20.05.2025

Section	Change	Date of change
Section 3.5	<b>added:</b> Forest regeneration As stated in RED III, “forest regeneration” means the re-establishment of a forest stand by natural or artificial means following the removal of the previous stand by felling or as a result of natural causes, including fire or storm.	20.05.2025
Section 4.1	Comprehensive reformulations and clarifications in relation to verification of scheme conformity, particularly: clarification of Level A and Level B verification and introduction of first and second party audits for low risk areas in Section 4.1.3.  <b>amended:</b> [...]For forest biomass, sustainability can be proved through audits in the sourcing area (so called “level B approach”) or a risk-based approach (so called “level A approach”) [...].  [...] In the SURE-EU system, in audits and inspections, compliance with sustainability requirements for forest biomass can be verified in their sourcing area using the SURE checklist for the production of forest biomass according to the criteria of article 29 (6b) and (7b) of the Revised Directive (EU) 2018/2001. [...]  <b>deleted:</b> In addition, this information is a key input for the statement of assurance that forest biomass is not sourced from land areas where no biomass may be grown (i.e. land with high biodiversity value, wetland or peatland status in reference to the cut-off date), to be issued by the installations producing biomass fuels from forest biomass. Conditions of the land for sourcing forest biomass are defined in the section [...] and section [...]. More on the statement of assurance can be found in the document “Scheme principles for the use of biomass fuels”.  <b>added:</b> In addition, this information is a key input for the statement of assurance that forest biomass is not sourced from land areas where no biomass may be grown (i.e. land with high biodiversity value, wetland or peatland status in reference to the cut-off date), to be issued by the installations producing biomass fuels from forest biomass. Conditions of the land for sourcing forest biomass are defined in the section [...] and section [...]. More on the statement of assurance can be found in the document “Scheme principles for the use of biomass fuels”.	20.05.2025

Section 4.2	<ul style="list-style-type: none"> <li>- areas designated by international or national legislation or by the competent authority as nature conservation areas, including wetlands and peatland, are protected,</li> </ul> <p><b>changed to:</b> areas designated by international or national legislation or by the competent authority as nature conservation areas, including wetlands, grassland, heathland and peatland, are protected,</p>	20.05.2025
Section 4.2	<p><b>added:</b></p> <ul style="list-style-type: none"> <li>- that forests in which the forest biomass is harvested does not stem from areas where no biomass may be grown, i.e., land with high biodiversity value, wetland and peatland status in reference to the cut-off date,</li> </ul>	20.05.2025
Section 4.2	<ul style="list-style-type: none"> <li>- care is taken during harvesting to preserve soil quality and biodiversity in order to minimise damage</li> </ul> <p><b>changed to:</b> care is taken during harvesting to preserve soil quality and biodiversity in order to minimise damage and in accordance with sustainable forest management principles</p>	20.05.2025
Section 4.3	<p><b>added:</b> RED III establishes restrictions on biomass harvesting in certain valuable landscapes, such as high biodiversity or high-carbon stock land. Proof of land status is therefore particularly important to demonstrate that forest biomass is harvested respecting areas where restrictions on biomass harvesting apply.</p> <p><b>added:</b> These restrictions are specified in Article 29 paragraph 3, subparagraphs a, b, d and e, Article 29 paragraph 4, subparagraph a and Article 29 paragraph 5 of the RED III.</p>	20.05.2025
Section 4.1.3	<p><b>added:</b> [...] If there is no legislation ensuring the statements of assurance at national/sub-national level (Level A), evidence has to be provided through an audit and/or inspection in the sourcing area that the biomass does not come from the no-go areas (according to Article 29(3)-(5) of the Revised Directive (EU) 2018/2001). [...]</p> <p><b>added:</b> o [...] areas designated by international or national legislation or by the competent authority as nature conservation areas, including wetlands, grassland, heathland and peatland, are protected, with the aim of preserving biodiversity and preventing habitat destruction [...]</p> <p><b>amended:</b> [...] First- or Second-party audit (level A approach). Pursuant to Revised Directive (EU) 2018/2001, only in the case that</p>	20.05.2025

	<p>the sourcing area is evaluated as low-risk, internal and supplier audits (first- or second- party audits respectively) [...]</p> <p>Article 29(3) – (5)  <b>changed to</b>  Article 29(3), points (a), (b), (d) and (e), Article 29(4), point (a), Article 29(5)</p>	
Section 4.1.2	<p><b>amended:</b>  [...] the risk assessment (explained in the next section). In case there is no risk assessment for the sourcing area, an independent, third-party audit to all the forest producers of the group will be carried out according to the criteria of article 29 (6b) and (7b) of the Revised Directive (EU) 2018/2001. If there is a risk assessment that classifies the sourcing area as “specified risk”, then all the forest biomass producers are inspected also according to the criteria of article 29 (6b) and (7b) of the Revised Directive (EU) 2018/2001. [...]</p>	20.05.2025
Section 4.2	<p><b>added:</b>  installations producing biomass fuel from forest biomass issue a statement of assurance that the biomass does not stem from areas where no biomass may be harvested.</p>	20.05.2025
Section 4.3.3	<p><b>added:</b>  This are contained in article 29 paragraph 3, subparagraphs a, b, d and e and paragraph 4, subparagraph a of the RED III.</p> <p>The section “4.3.3. Land with restrictions on biomass harvesting” was added to improve readability of the document. The main change is that the examples of the means to prove land status are summarized in one section, to avoid redundancy.</p> <p>The concepts of “Type I” and “Type II” restrictions on biomass harvesting are introduced, to refer to the land where biomass may not be harvested under any circumstances or where harvesting is possible only when certain requirements are met.</p>	20.05.2025
Section 4.3.3.2	<p><b>amended:</b>  [...] According to article 29 (3) of the Revised Directive 2018/2001 the category “land with high biodiversity value” encompasses primary and old-growth forest [...]</p>	20.05.2025
Section 4.3.3.3	<p><b>amended:</b>  [...] According to article 29 (4) of the Revised Directive 2018/2001 Biomass fuels made from forest biomass may not be made from raw material obtained from land with the status of wetland (Type I restriction).[...]</p>	20.05.2025

Section	Change	Date of change
Section 4.3.3.4	<b>amended:</b> [...] According to article 29 (5) of the Revised Directive 2018/2001 Forest biomass maybe harvested in peatland as long as evidence is provided that the growing and harvest of this raw material	20.05.2025
Section 4.4.6	Forest biomass shall not be produced or sourced from land with high biodiversity value [...] <b>changed to:</b> Forest biomass may not be produced or sourced from land with high biodiversity value [...]	20.05.2025
Section 4.4.6.1	4.4.6.1 Primary forest, old growth forest and highly bio-diverse forest Biomass fuels produced from forest biomass shall not be made from raw material obtained from land that had any of these statuses in or after January 2008, whether or not the land continues to have that status: <ul style="list-style-type: none"> <li>- primary forest; other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forest</li> <li>- highly biodiverse forest and other wooded land which is non-degraded and species-rich and has been identified as being highly biodiverse by the relevant competent authority.</li> </ul> Means of verification could include: <ul style="list-style-type: none"> <li>- Official maps</li> <li>- Confirmation by the competent authority (when applicable)</li> <li>- Forest management plans, operational protocols, harvesting protocols, etc</li> </ul> Reports from experts, to be checked as part of the audit. <b>changed to:</b> 4.4.6.1 Primary forest and old growth forest Biomass fuels produced from forest biomass may not be made from raw material obtained from land that had any of these statuses in or after January 2008, whether or not the land continues to have that status: <ul style="list-style-type: none"> <li>- primary forest; other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forest</li> </ul> Means of verification could include: <ul style="list-style-type: none"> <li>- Official maps</li> <li>- Confirmation by the competent authority (when applicable)</li> <li>- Forest management plans, operational protocols, harvesting protocols, etc</li> </ul> Reports from experts, to be checked as part of the audit.	20.05.2025

Section	Change	Date of change
Section 4.4.6.2	<p><b>added:</b></p> <p>4.4.6.2 Highly biodiverse forest</p> <p>Biomass fuels produced from forest biomass may not be made from raw material obtained from land that had any of these statuses in or after January 2008, whether or not the land continues to have that status:</p> <ul style="list-style-type: none"> <li>- highly biodiverse forest and other wooded land which is non-degraded and species-rich and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with the nature protection purposes.</li> </ul> <p>Means of verification could include:</p> <ul style="list-style-type: none"> <li>- Official maps</li> <li>- Confirmation by the competent authority (when applicable)</li> <li>- Forest management plans, operational protocols, harvesting protocols, etc</li> </ul> <p>Reports from experts, to be checked as part of the audit.</p>	20.05.2025
Section 4.4.6.3	<p>Section 4.4.6.2 Grassland</p> <p><b>changed to:</b></p> <p>Section 4.4.6.3 Grassland</p> <p>Biomass fuels from forest biomass shall not be produced from raw material obtained from land that is larger than one hectare and that was protected as highly biodiverse grassland in or after January 2008 [...]</p> <p><b>changed to:</b></p> <p>Biomass fuels from forest biomass may not be produced from raw material obtained from land that is larger than one hectare and that was protected as highly biodiverse grassland in or after January 2008 [...]</p> <p><b>added:</b></p> <p>In the case of non-natural highly biodiverse grassland, harvesting is not possible unless evidence is provided that the harvesting of the raw material is necessary to maintain the status of highly biodiverse grassland. More details on this requirement are provided in Section 5.4.3.2.</p>	20.05.2025
Section 4.4.6.4	<p>Section 4.4.6.3 Heathland</p> <p><b>changed to:</b></p> <p>Section 4.4.6.4 Heathland</p> <p>Biomass fuels from forest biomass shall not be produced from raw material obtained from land that had the status of heathland in or after January 2008 [...]</p> <p><b>changed to:</b></p> <p>Biomass fuels from forest biomass may not be produced from raw material obtained from land that had the status of heathland in or after January 2008 [...]</p>	20.05.2025

Section	Change	Date of change
Section 4.4.7	<p>Biomass fuels made from forest biomass shall not be made from raw material obtained from land with high carbon stock [...]</p> <p><b>changed to:</b></p> <p>Biomass fuels made from forest biomass may not be made from raw material obtained from land with high carbon stock [...]</p>	20.05.2025
Section 4.4.5	<p>Growing and harvesting biomass on land within protected areas where forestry management is permitted represents a unique case. The forestry operation has to document whether forestry management takes place within an area designated to serve the purposes of nature conservation and that nature conservation requirements have been met in the growing and harvesting of the raw material for biomass.</p> <p><b>changed to:</b></p> <p>Growing and harvesting biomass on land within protected areas where forestry management is permitted represents a unique case. The forestry operation has to document whether forestry management takes place within an area designated to serve the purposes of nature conservation, including in wetlands, grassland, heathland and peatlands, and that nature conservation requirements have been met in the growing and harvesting of the raw material for biomass. In addition, under RED III it shall also be observed that the forest biomass is not sourced from areas where no biomass may be grown, i.e., land with high biodiversity value, wetland or peatland status in reference to the cut-off date, as detailed in section [...].</p>	20.05.2025
Section 4.4.5	<p><b>deleted:</b></p> <p>official logging permits including conditions ensuring that there is no conflict with the relevant nature protection objectives</p>	20.05.2025
Section 4.4.6	<p><b>added:</b></p> <p>Land with high biodiversity value</p> <p>Forest biomass shall not be produced or sourced from land with high biodiversity value, namely land that had one of the statuses indicated in the next sections in or after January 2008, whether or not the land continues to have that status. More information on the conditions under which forest biomass shall not be sourced from land with high biodiversity value can be found in section [...]"</p>	20.05.2025
Section 4.4.6.1	<p><b>added:</b></p> <p>Primary forest, old growth forest and highly biodiverse forest</p> <p>Biomass fuels produced from forest biomass shall not be made from raw material obtained from land that had any of</p>	20.05.2025

	<p>these statuses in or after January 2008, whether or not the land continues to have that status:</p> <ul style="list-style-type: none"> <li>- primary forest; other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forest</li> <li>- highly biodiverse forest and other wooded land which is non-degraded and species-rich and has been identified as being highly biodiverse by the relevant competent authority.</li> </ul> <p>Means of verification could include:</p> <ul style="list-style-type: none"> <li>- Official maps</li> <li>- Confirmation by the competent authority (when applicable)</li> <li>- Forest management plans, operational protocols, harvesting protocols, etc</li> </ul> <p>Reports from experts, to be checked as part of the audit.</p>	
Section 4.4.6.2	<p><b>added:</b></p> <p>Grassland</p> <p>Biomass fuels from forest biomass shall not be produced from raw material obtained from land that is larger than one hectare and that was protected as highly biodiverse grassland in or after January 2008, whether or not the land still has that status.</p> <p>The following are examples of means of verification (non-exhaustive):</p> <ul style="list-style-type: none"> <li>- providing evidence that the forest where the biomass is harvested is older than 20 years old</li> <li>- forest management plans, operational protocols, harvesting protocols, etc</li> <li>- check of compliance with the requirements for protected areas by a certification body</li> <li>- provision of an official document from the authority responsible for the protected area</li> <li>- similar confirmation by the competent authority as part of an inspection whereby the forest biomass producers has to be able to provide the authority with the contact people responsible and their telephone numbers</li> <li>- extract from designation of a protected area</li> </ul> <p>evaluation of an independent external expert, to be checked as part of the audit.</p>	20.05.2025

Section	Change	Date of change
Section 4.4.6.3	<b>added:</b> Heathland Biomass fuels from forest biomass shall not be produced from raw material obtained from land that had the status of heathland in or after January 2008, whether or not the land still has that status. The following could be considered as means of verification (non-exhaustive list): <ul style="list-style-type: none"> <li>- confirmation that the sourcing area is a forest since before January 2008 through forest management plans, operational protocols, harvesting protocols, etc</li> <li>- external assessment, checked as a part of the audit.</li> </ul> international and national databases, e.g., Natura 2000 viewer.	20.05.2025
Section 4.4.7	<b>added:</b> Wetland Biomass fuels made from forest biomass shall not be made from raw material obtained from land with high carbon stock, namely land that had the status of wetland in January 2008 and no longer has it. These provisions do not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008. More details on the condition under which forest biomass shall not be sourced from wetlands is presented in section 5.5 “The forest biomass is not from wetlands”. Possible means of verification are (non-exhaustive list): <ul style="list-style-type: none"> <li>- results of relevant compliance audits and inspections</li> <li>- international and national databases-</li> <li>- satellite imaging</li> <li>- official maps</li> <li>- confirmation by the competent authority (when applicable)</li> </ul> forest management plans, operational protocols, harvesting protocols, etc	20.05.2025
Section 4.4.8	Peatland and wetland <b>changed/renumbered to:</b> Peatland <b>and added:</b> More details on the conditions under which forest biomass shall not be harvested in peatlands is provided in section [...]	20.05.2025
Section 5	<b>deleted:</b> through management systems	20.05.2025
Section 5	<b>added:</b> [...] These requirements are aligned with sustainable forest management principles. [...]	20.05.2025

Section	Change	Date of change
Section 5.3	This section was re written for clarification and readability purposes. <b>added:</b> Based on Article 29 paragraph 6 of RED III	20.05.2025
Section 5.3	Areas designated for nature conservation purposes are not negatively affected <b>changed to:</b> Areas designated for nature conservation purposes are protected	20.05.2025
Section 5.3	[...] including in wetlands and peatlands, [...] <b>changed to:</b> [...] including in wetlands, grassland, heathland and peatlands, [...]	20.05.2025
Section 5.3	<b>added:</b> In addition to the use restrictions defined by law, under RED III it shall also be observed that the forest biomass is not sourced from areas where no biomass shall be grown, i.e., land with high biodiversity value, with high-carbon stock or peatland status in reference to the cut-off date, as detailed in section [...].	20.05.2025
Section 5.4	This section was re written for clarification and readability purposes.  Forest biomass shall not be produced or sourced from land with high biodiversity value [...] <b>changed to:</b> Forest biomass may not be produced or sourced from land with high biodiversity value [...]	20.05.2025
Section 5.4.1	<b>added:</b> The forest biomass is not from primary forests nor from old-growth forests Biomass fuels produced from forest biomass shall not be made from raw material obtained from land that was primary forest; other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forest in or after January 2008, whether or not the land continues to have that status. Primary forests are forests where native tree species grow and ecological processes are not significantly disturbed. There is also no clearly visible indication of human activity. Old-growth forests are primary or secondary forests that reach certain age parameters and certain attributes without human-induced disturbances, or the last significant human intervention was long enough ago that the natural species composition and processes were restored. Some of the main characteristics of primary forests include natural forest dynamics, such as natural tree species	20.05.2025

	<p>composition, occurrence of deadwood, natural age structure and natural regeneration processes. The area is also large enough to maintain its natural ecological processes. Old-growth forests share most of these attributes. In addition, age characteristics are relevant in old-growth forests. The following criteria is of reference: (i) stands of trees reach on average half of the maximum longevity of the dominant species and (ii) some of the trees are already close to reaching the maximum longevity.</p> <p>Native tree species are tree species that grow within their natural growing range in places and under climate conditions to which they are adjusted through their natural evolution without human intervention. They are distinctive of primary forests but not necessarily of old-growth forests. Native tree species do not include:</p> <ul style="list-style-type: none"> <li>- tree species introduced into areas by humans where they never would have grown without human intervention</li> <li>- tree species and/or cultivated species that would not have grown in these places or under these climate conditions without human intervention even if these places and/or climate conditions are still within the wider geographic growing range</li> </ul> <p>Clearly visible indications of human activity are:</p> <ul style="list-style-type: none"> <li>- economic use (e.g. wood harvest, forest clearance, land-use change)</li> <li>- heavily fragmented by infrastructure (e.g. streets, power lines)</li> <li>- disturbances of the natural biodiversity (e.g. significant presence of non-native plants and animal species)</li> </ul> <p>Deadwood means all non-living woody biomass not contained in the litter, either standing, lying on the ground, or in the soil, including wood lying on the surface, coarse debris, dead roots, and stumps larger than or equal to 15 cm in diameter or any other diameter used by the country concerned.</p> <p>Activities performed by indigenous populations and other traditional sections of the population whose livelihoods depend on the use of forest products who have a minor impact on the forested land (e.g. collection of wood and non-wood products, use of a small number of trees and small-scale clearance as part of traditional systems of use) are not considered clearly visible indications of human activity as long as the impact on the forest is minor.</p> <p>The definitions of the country of origin of primary and old-growth forests should prevail. In case of absence of any local reference, the definitions here provided should be considered.</p>	
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Section	Change	Date of change
Section 5.4	<p><b>added:</b> Biomass from land with high biodiversity value Forest biomass shall not be produced or sourced from land with high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status. Forest biomass shall not be sourced from land under these statuses irrespective of whether or not it is defined by national or sub-national laws that apply in the area of harvest.</p>	20.05.2025
Section 5.4.1	<p>Old-growth forests are primary or secondary forests that reach certain age parameters and certain attributes without human-induced disturbances, or the last significant human intervention was long enough ago that the natural species composition and processes were restored.</p> <p><b>changed to:</b> Old-growth forest is defined as ‘A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes’</p> <p>Reference 21: SWD(2023) 62 FINAL. COMMISSION GUIDELINES FOR DEFINING, MAPPING, MONITORING AND STRICTLY PROTECTING EU PRIMARY AND OLD-GROWTH FORESTS. Extracted from Section 2.3.</p> <p><b>added:</b> According to Article 29 paragraph 3, subparagraph a,</p> <p>Biomass fuels produced from forest biomass shall not be made from raw material obtained from land that was primary forest [...]</p> <p><b>changed to:</b> Biomass fuels produced from forest biomass may not be made from raw material obtained from land that was primary forest [...]</p>	20.05.2025
Section 5.4.1	<p><b>deleted:</b> The forest biomass is not from primary forests Primary forests are forests where native tree species grow and ecological processes are not significantly disturbed. There is also no clearly visible indication of human activity or the last significant human intervention was long enough ago that the natural species composition and</p>	20.05.2025

	<p>processes were restored.</p> <p>Some of the main characteristics of primary forests include natural forest dynamics, such as natural tree species composition, occurrence of deadwood, natural age structure and natural regeneration processes. The area is also large enough to maintain its natural ecological processes.</p> <p>Native tree species are tree species that grow within their natural growing range in places and under climate conditions to which they are adjusted through their natural evolution without human intervention.</p> <p>Native tree species do not include:</p> <ul style="list-style-type: none"> <li>- tree species introduced into areas by humans where they never would have grown without human intervention</li> <li>- tree species and/or cultivated species that would not have grown in these places or</li> <li>- under these climate conditions without human intervention even if these place and/or climate conditions are still within the wider geographic growing range</li> </ul> <p>Clearly visible indications of human activity are:</p> <ul style="list-style-type: none"> <li>- economic use (e.g. wood harvest, forest clearance, land-use change)</li> <li>- heavily fragmented by infrastructure (e.g. streets, power lines)</li> <li>- disturbances of the natural biodiversity (e.g. significant presence of non-native plants and animal species)</li> </ul> <p>Deadwood means all non-living woody biomass not contained in the litter, either standing, lying on the ground, or in the soil, including wood lying on the surface, coarse debris, dead roots, and stumps larger than or equal to 10 cm in diameter or any other diameter used by the country concerned.</p> <p>Activities performed by indigenous populations and other traditional sections of the population whose livelihoods depend on the use of forest products who have a minor impact on the forested land (e.g. collection of wood and non-wood products, use of a small number of trees and small-scale clearance as part of traditional systems of use) are not considered clearly visible indications of human activity as long as the impact on the forest is minor.</p>	
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Section	Change	Date of change
Section 5.4.2	<p><b>added:</b> Based on Article 29 paragraph 3, subparagraph b of RED III, Biomass fuels produced from forest biomass shall not be made from raw material obtained from land that was highly biodiverse or other wooded land in or after January 2008[...]</p> <p><b>changed to:</b> Biomass fuels produced from forest biomass may not be made from raw material obtained from land that was highly biodiverse or other wooded land in or after January 2008[...]</p>	20.05.2025
Section 5.4.2	<p><b>added:</b> The forest biomass is not from highly biodiverse forest and other wood-ed land which is species-rich and not degraded Biomass fuels produced from forest biomass shall not be made from raw material obtained from land that was highly biodiverse or other wooded land in or after January 2008, whether or not the land continues to have that status, unless evidence is provided that the pro-duction of that raw material did not interfere with the protection of the biodiversity status. Highly biodiverse forest and other wooded land is defined as forest and other wooded land that is non-degraded and species-rich and has been identified as being highly biodiverse by the relevant competent authority. The definitions of ‘degraded’ and ‘species-rich’ included in Commission Regulation (EU) No 1307/2014 shall be applied in the context of this criterion. “Biological diversity” or “biodiversity” is defined by the Convention on Biological Diversity as: “variability among living organisms from all sources, (...); This includes diversity within species, between species and of ecosystems.” Biological diversity is thus not limited to species of flora and fauna (animals, higher plants, mosses, lichens, fungi and microorganisms) per se. Many species are also further divided into sub-species and regional varieties and are divided into genetically different populations. Biodiversity therefore includes intra-species genetic diversity as well as the habitats of organisms and ecosystems. In simplified terms, biodiversity thus describes the levels “diversity of habitats”, “diversity of species” and “genetic diversity within species”. Not degraded means not characterised by long-term loss of biodiversity due to for instance overuse, mechanical damage to the vegetation, soil erosion or loss of soil quality. In the case of species-rich areas, this is:</p>	20.05.2025

	<ul style="list-style-type: none"> <li>- a habitat of significant importance to critically endangered, endangered or vulnerable species as classified by the International Union for the Conservation of Nature Red List of Threatened Species or other lists with a similar purpose for species or habitats laid down in national legislation or recognised by a competent national authority in the country of origin of the raw material</li> <li>- a habitat of significant importance to endemic or restricted-range species</li> <li>- a habitat of significant importance to intra-species genetic diversity</li> <li>- a habitat of significant importance for globally significant concentrations of migratory species or congregatory species</li> <li>- a regionally or nationally significant or highly threatened or unique ecosystem</li> </ul> <p>Forests or wooded areas in the following regions of the European Union must, without exception, be considered highly diverse forests or wooded areas:</p> <ul style="list-style-type: none"> <li>- Habitats listed in Annex I of Directive 92/43/EEC of the European Council</li> <li>- Habitats with great significance for animal and plant species of Community (EU) interest (Annexes II and IV of Directive 92/43/EEC)</li> <li>- Habitats of importance for wild birds listed in Annex I to Directive 2009/147/EC of the European Parliament and of the Council</li> </ul> <p>Land that is considered highly biodiverse may be used for the production of raw materials whenever economic operators can provide evidence:</p> <ul style="list-style-type: none"> <li>- that the harvesting of the raw material is necessary to preserve the highly bio-diverse status or</li> <li>- that management practices do not present a risk of causing biodiversity decline of the land.</li> </ul> <p>This can be done through:</p> <ul style="list-style-type: none"> <li>- check of compliance with the requirements for protected areas by a certification body</li> <li>- provision of an official document from the authority responsible for the protected area</li> <li>- similar confirmation by the competent authority as part of an inspection whereby the forest biomass producers have to be able to provide the authority with the contact people responsible and their telephone numbers</li> <li>- Extract from designation of a protected area</li> </ul> <p>A precautionary approach must always be taken when determining the potential biodiversity of forests and other wooded land. The auditor must assess whether the evaluation of biodiversity is necessary. If the auditor determines that an assessment of the status of forests and other</p>	
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	<p>wooded land is necessary, it must be performed by an external and independent expert without any conflicts of interest with the activity being audited, who may be a member of the auditing team. The evaluation and the result must then be checked as part of the audit.</p> <p>The requirements applicable to SURE auditors and experts are described in detail in the SURE document “Scheme principles for the certification process – Requirements and specifications”.</p>	
Section 5.4.3	<p><b>added:</b> Following Article 29 paragraph 3, subparagraph d of RED III,</p> <p>Biomass fuels from forest biomass shall not be produced from raw material obtained from land that is larger than one hectare and that was protected as highly biodiverse grassland [...]</p> <p>changed to: Biomass fuels from forest biomass may not be produced from raw material obtained from land that is larger than one hectare and that was protected as highly biodiverse grassland [...]</p>	20.05.2025
Section 5.4.3	<p><b>added:</b> The forest biomass is not from highly biodiverse grassland Biomass fuels from forest biomass shall not be produced from raw material obtained from land that is larger than one hectare and that was protected as highly biodiverse grassland in or after January 2008, whether or not the land still has that status.</p> <p>According to Article 1 (1) of Regulation 1307/2014 (EU), grassland means terrestrial ecosystems dominated by herbaceous or shrub vegetation for at least five years continuously. It includes meadows or pasture that is cropped for hay but excludes land cultivated for other crop production and cropland lying temporarily fallow.</p> <p>It also excludes continuously forested areas as defined in Article 29 (4)(b) of the Revised Directive (EU) 2018/2001, except in the case of agroforestry systems which include land-use systems where trees are managed in agricultural structures together with crop or livestock production systems. The predominance of herbaceous vegetation or shrubs means that their combined ground cover is greater than the canopy cover of trees.</p> <p>Where grassland has already been converted to arable land and it is not possible to assess the characteristics of the land itself through information available from the national competent authorities or satellite imagery, the land is not considered highly biodiverse grassland before conversion.</p> <p>Grassland in the following geographical areas of the European Union is considered highly biodiverse grassland with no exceptions:</p>	20.05.2025

	<ul style="list-style-type: none"> <li>- Habitats listed in Annex I of Directive 92/43/EEC of the European Council</li> <li>- Habitats with great significance for animal and plant species of Community (EU) interest (Annexes II and IV of Directive 92/43/EEC)</li> <li>- Habitats of importance for wild birds listed in Annex I to Directive 2009/147/EC of the European Parliament and of the Council</li> </ul> <p>For all land which according to the above mentioned definition was grassland in January 2008 or has become grassland in the meantime, a distinction needs to be made between</p> <ul style="list-style-type: none"> <li>- “natural highly biodiverse grassland” and</li> <li>- “non-natural highly biodiverse grassland”</li> </ul> <p>spanning more than one hectare, for which, among others, human intervention is an important factor. Human intervention means managed grazing, mowing, cutting, harvesting or burning. The European Commission may adopt implementing acts that further specify the criteria used to determine the type of grassland. Any updates will immediately enter into force in the SURE-EU system.</p>	
Section 5.4.3.1	<p><b>added:</b> Natural highly biodiverse grassland In this context natural highly biodiverse grassland means grassland that:</p> <ul style="list-style-type: none"> <li>- would remain grassland in the absence of human intervention</li> <li>- maintains the natural species composition and ecological characteristics and processes</li> </ul> <p>If such land is located in any of the geographic ranges listed in Article 2 of Regulation (EU) No 1307/2014, it is considered as being, or having been natural, highly biodiverse grassland. For land that is located outside these areas, it must be determined whether the grassland maintains, or would have maintained the natural species composition and ecological characteristics and processes. Where that is the case, the land is considered as being, or having been, natural, highly biodiverse grassland No raw materials from land which is or was natural highly biodiverse grassland in or after January 2008 may be used for the production of solid or gaseous biomass fuels.</p>	20.05.2025
Section 5.4.3.2	<p><b>added:</b> Non-natural highly biodiverse grassland Non-natural highly biodiverse grassland means grassland that:</p> <ul style="list-style-type: none"> <li>- would cease to be grassland in the absence of human intervention and</li> <li>- is not degraded and</li> </ul>	20.05.2025

	<ul style="list-style-type: none"> <li>- has been identified as being highly biodiverse by the relevant competent authority and</li> <li>- is species-rich.</li> </ul> <p>Species-rich in this context means</p> <ul style="list-style-type: none"> <li>- a habitat of significant importance to critically endangered, endangered or vulnerable species as classified by the International Union for the Conservation of Nature Red List of Threatened Species, or</li> <li>- a habitat of significant importance as classified by other lists with a similar purpose for species or habitats laid down in national legislation or recognised by a competent national authority in the country of origin of the raw material, or</li> <li>- a habitat of significant importance to endemic or restricted-range species, or</li> <li>- a habitat of significant importance to intra-species genetic diversity, or</li> <li>- a habitat of significant importance for globally significant concentrations of migratory species or congregatory species, or</li> <li>- a regionally or nationally significant or highly threatened or unique ecosystem</li> </ul> <p>If the land is located outside protected areas listed in Article 2 of Directive (EU) 1307/2014, it is only high biodiversity grassland if all criteria listed under 1-4 are met.</p>	
Section 5.4.3.3	<p><b>added:</b></p> <p>Use of the vegetation from highly biodiverse land</p> <p>Land that is considered natural or non-natural high biodiversity grassland due to its geographical location within the protected areas listed in Article 2 of Regulation (EU) 1307/2014 or for any other reason listed above may be used for the production of raw materials whenever economic operators can provide evidence:</p> <ul style="list-style-type: none"> <li>- that the harvesting of the raw material is necessary to preserve the highly biodiverse grassland status and</li> <li>- that management practices do not present a risk of causing biodiversity decline of the grassland.</li> </ul> <p>This can be done through:</p> <ul style="list-style-type: none"> <li>- check of compliance with the requirements for protected areas by a certification body</li> <li>- provision of an official document from the authority responsible for the protected area</li> <li>- similar confirmation by the competent authority as part of an inspection whereby the forest biomass producers has to be able to provide the authority with the contact people responsible and their telephone numbers</li> <li>- Extract from designation of a protected area</li> </ul> <p>Where such evidence is unable to be provided, there must be proof that permission has been granted by the relevant competent authority, or designated agency, to harvest the</p>	20.05.2025

	<p>raw material in order to preserve the highly biodiverse grassland status.</p> <p>If the harvesting of raw material is not necessary to preserve the grassland status or the grassland has been converted e.g. to cropland used for the production of raw materials, it has to be established whether the grassland is or was highly biodiverse:</p> <ul style="list-style-type: none"> <li>- If the land is located in the areas listed in Article 2 of Directive (EU) 1307/2014, the grassland is considered non-natural highly biodiverse grassland.</li> </ul> <p>If the land is located outside these areas it must be determined according to the criteria laid down in Article 1(3) and (4) of Directive (EU) 1307/2014 whether the land is/was degraded and species-rich. If the land is not degraded and species-rich, or it was before being converted, it is considered non-natural highly biodiverse grassland. If the grassland is or was non-natural highly biodiverse grassland raw material from this area cannot be regarded as compliant with the sustainability criteria.</p> <p>A precautionary approach must always be taken when determining the potential biodiversity of grassland. The auditor must assess whether the evaluation of highly biodiverse grassland is necessary.</p> <ul style="list-style-type: none"> <li>- If the auditor determines that an assessment of grassland status is necessary, it must be performed by an external and independent expert without any conflicts of interest with the activity being audited, who may be a member of the auditing team. The evaluation and the result must then be checked as part of the audit.</li> <li>- If the auditor does not consider it necessary to assess the biodiversity of the grassland, or if there is otherwise no evidence of information from the competent authorities on the biodiversity status of the grassland concerned, the grassland is not considered to be high biodiversity grassland prior to conversion.</li> </ul> <p>The requirements applicable to SURE auditors and experts are described in detail in the SURE document "Scheme principles for the certification process – Requirements and specifications".</p>	
Section 5.4.4	<p><b>added:</b></p> <p>Based on Article 29 paragraph 3, subparagraph e of RED III,</p> <p>Biomass fuels from forest biomass shall not be produced from raw material obtained from land that had the status of heathland [...]</p> <p><b>changed to:</b></p> <p>Biomass fuels from forest biomass may not be produced from raw material obtained from land that had the status of heathland [...]</p>	20.05.2025
Section 5.4.4	<p><b>added:</b></p>	20.05.2025

	<p><b>The forest biomass is not from heathlands</b></p> <p>Biomass fuels from forest biomass shall not be produced from raw material obtained from land that had the status of heathland in or after January 2008, whether or not the land still has that status.</p> <p>In the absence of a definition in the country of origin of the forest biomass, heathlands shall be defined as <i>“Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development”</i>. Although heathlands are a heterogeneous ecosystem, in Europe they share some common attributes that allow to identify them:</p> <ul style="list-style-type: none"> <li>- In terms of species, there is a prevalence of <i>Calluna vulgaris</i>, <i>Erica</i> spp., <i>Vaccinium</i> spp., <i>Ulex</i> spp. among others (the list is not exhaustive).</li> <li>- Soils are acidic, sandy or sandy-loam, poor in nutrients and freely-draining.</li> <li>- Heathlands are present from lowlands to montane areas.</li> </ul> <p>Evidence shall be provided that the land where the biomass was sourced did not have the status of heathland prior to January 2008. This can be done through the following:</p> <ul style="list-style-type: none"> <li>- providing proof that the sourcing area was a forest before January 2008,</li> <li>- providing an official document from the authority responsible for assigning the status of heathlands, for example, Federal Agency for Nature Conservation (Bundesamt für Naturschutz) in Germany</li> </ul> <p>An overview of the areas covered by heathlands in the European Union can be found in the Natura 2000 Viewer. Although information reported by this source is partial, in this site it is possible to check the geographical localization of heathlands using the codes 4030 and 4020. In addition, the Viewer also reports since when the site is protected, which can be useful to contrast with the cut-off date.</p> <p>The auditor must assess whether the evaluation of the status of heathland is necessary. If the auditor deems the assessment of the status of heathland needed, it must be performed by an external and independent expert without any conflicts of interest with the activity being audited, who may be a member of the auditing team. The evaluation and the result must then be checked as part of the audit.</p> <p>The requirements applicable to SURE auditors and experts are described in detail in the SURE document “Scheme principles for the certification process – Requirements and specifications”.</p>	
Section 5.5	<p><b>deleted:</b></p> <p>with carbon stock, namely land</p>	20.05.2025

	<p><b>added:</b> This means that for wetlands Type I restrictions apply (Figure 7). Therefore, evidence has to be provided that the forest biomass was not harvested from land that was wetland in January 2008. Please refer to Section 4.3.3</p> <p><b>deleted:</b> Forest biomass shall not be sourced from land under this status irrespective of whether or not it is defined by national or sub-national laws that apply in the area of harvest.</p> <p><b>added:</b> Forest biomass producers need to prove that the land where the biomass was harvested did not have the status of wetland. Examples of means to prove land status are described in Section 4.3.3. The auditor must assess whether the evaluation of the status of heathland is necessary, as detailed also in Section 4.3.3.</p> <p><b>added:</b> According to Article 29 paragraph 4 subparagraph a</p> <p>Biomass fuels made from forest biomass shall not be made from raw material obtained from land with high carbon stock [...]</p> <p><b>changed to:</b> Biomass fuels made from forest biomass may not be made from raw material obtained from land with high carbon stock [...]</p>	
Section 5.5	<p><b>added:</b> The forest biomass is not from wetlands Biomass fuels made from forest biomass shall not be made from raw material obtained from land with high carbon stock, namely land that had the status of wetland in January 2008 and no longer has it. These provisions do not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008. Forest biomass shall not be sourced from land under this status irrespective of whether or not it is defined by national or sub-national laws that apply in the area of harvest. Wetlands are land that is covered with or saturated by water permanently or for a significant part of the year. Wetlands include, in particular, swamps, marshes or bogs, as well as other bodies of water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres. “Covered with water” means that water is visible on the surface as surface water.</p>	20.05.2025

	<p>The soil is “saturated by water” if it is completely inundated with water and, as a result, moisture is present at the surface but no shallow pools form.</p> <p>This state is evident throughout the entire year for areas that are permanently covered or saturated by water.</p> <p>This state is not evident throughout the entire year for areas that are covered or saturated by water for a significant part of the year. “A significant part of the year” means that the cover or saturation with water lasts for such a considerable part of the year that the dominant organisms have adapted to moisture or reduced conditions. This applies, in particular, to shallow water areas, coastal areas, swamps, bogs, fens and moors.</p> <p>Retaining the wetland status also means that this state may not be actively changed or adversely affected. During the annual audit, an auditor must examine every change in the status of wetlands that has occurred within a year.</p>	
Section 5.6	<p>Biomass fuels made from forest biomass shall not be made from raw material obtained from land that was peatland in January 2008.</p> <p><b>changed to:</b></p> <p>Biomass fuels made from forest biomass may not be made from raw material obtained from land that was peatland in January 2008.</p>	20.05.2025
Section 5.6	<p><b>deleted:</b></p> <p>Forest biomass shall not be sourced from land under this status irrespective of whether or not it is defined by national or sub-national laws that apply in the area of harvest.</p> <p><b>added:</b></p> <p>Examples of means to provide evidence are (non-exhaustive list):</p> <ul style="list-style-type: none"> <li>✓ Forest management plans approved by the competent authorities,</li> <li>✓ operational protocols or harvesting protocols,</li> <li>✓ official logging permits</li> </ul> <p><b>added:</b></p> <p>According to Article 29 paragraph 5</p>	20.05.2025
Section 5.6	<p><b>added:</b></p> <p>Biomass from areas that were peatland in January 2008</p> <p>Biomass fuels made from forest biomass shall not be made from raw material obtained from land that was peatland in January 2008.</p> <p>Forest biomass shall not be sourced from land under this status irrespective of whether or not it is defined by national or sub-national laws that apply in the area of harvest.</p> <p>An exception is possible if evidence is provided that</p> <ul style="list-style-type: none"> <li>- the land was completely drained in January 2008 or</li> </ul>	20.05.2025

	<p>- the land has not been drained since January 2008.</p> <p>This means that for peatland that was partially drained in January 2008 a subsequent deeper drainage, affecting soil that was not already fully drained, would constitute a breach of the criterion.</p> <p>Peat itself is not considered biomass.</p> <p>Drainage is defined as a reduction of the average annual water level due to an increased water loss or a reduced water supply as a result of human activities or installations both inside and outside of an area.</p> <p>Peatland that was already used for harvesting forest biomass before the cut-off date may be used for biomass cultivation as long as evidence is provided that the cultivation and harvest of this raw material did not require land to be drained that was previously not drained.</p>	
Section 5.7	<p>Biodiversity in forests is preserved or promoted</p> <p><b>changed to:</b></p> <p>Biodiversity in forests is preserved or promoted and habitat destruction is prevented</p>	20.05.2025
Section 5.7	<p>Therefore [...] to biodiversity shall be [...]</p> <p><b>changed to:</b></p> <p>Therefore [...] to biodiversity and habitats shall be [...]</p>	20.05.2025
Section 5.7.1	<p>A locally appropriate quality [...]</p> <p><b>changed to:</b></p> <p>A locally appropriate and ecologically quality [...]</p>	20.05.2025
Section 5.7.1	<p><b>deleted:</b></p> <p>The use of biomass from forests or from other wooded land with high biological diversity is only permitted if it can be proven that the sourcing of this raw material does not negatively impact biological diversity.</p> <p>Forests and other wooded land of high biological diversity are non-degraded, species-rich forest or wooded areas or areas designated by the competent authorities as wooded or wooded areas of high biological diversity.</p> <p>Not degraded means not characterised by long-term loss of biodiversity due to, for example, overuse, mechanical damage to the vegetation, soil erosion or loss of soil quality.</p> <p>In the case of species-rich areas, this is:</p> <p>a habitat of significant importance to critically endangered, endangered or vulnerable species as classified by the International Union for the Conservation of Nature Red List of Threatened Species or other lists with a similar purpose for species or</p> <p>habitats laid down in national legislation or recognised by a competent national authority in the country of origin of the raw material, or</p>	20.05.2025

	<p>a habitat of significant importance to endemic or restricted-range species or</p> <p>a habitat of significant importance to intra-species genetic diversity, or</p> <p>a habitat of significant importance for globally significant concentrations of migratory species or congregatory species or</p> <p>a regionally or nationally significant or highly threatened or unique ecosystem</p> <p>Forests or wooded land in the following regions of the European Union must, without exception, be considered highly diverse forests or wooded areas:</p> <p>habitats listed in Annex I of Directive 92/43/EEC of the European Council</p> <p>habitats with great significance for animal and plant species of Community (EU) interest (Annexes II and IV of Directive 92/43/EEC)</p> <p>habitats of importance for wild birds listed in Annex I to Directive 2009/147/EC of the European Parliament and of the Council</p> <p>However, assessing whether a forest is highly biodiverse requires forestry as well as technical knowledge that goes beyond the skills that can be expected of the auditors who verify the accuracy of the information provided by operators in the SURE-EU system.</p> <p>A precautionary approach is therefore taken when identifying and assessing the potentially high biodiversity of forest or other wooded land: The auditor must determine whether a basic assessment of the biodiversity of a forest or other wooded land is necessary. If “an evaluation is necessary”, it must be carried out by an independent expert who can be consulted in addition to the “auditor”.</p> <p>The evaluation and the result must then be checked as part of the audit. The requirements applicable to SURE auditors and experts are described in detail in the SURE document “Scheme principles for neutral inspections”.</p>	
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Section	Change	Date of change
Section 5.7.2	<p>the biomass of forestry plantations was not produced on land that had the status of “land with high biodiversity value” or wetlands, under Revised Directive (EU) 2018/2001 or natural forest under the SURE-EU scheme in or after January 2008</p> <p><b>changed to:</b> the biomass of forestry plantations was not produced on land that had the status of primary or old-growth forest, natural highly biodiverse grassland, heathland or wetlands, under Revised Directive (EU) 2018/2001 or natural forest under the SURE-EU scheme in or after January 2008</p> <p><b>added:</b> the limitations to harvest biomass on land with the status of highly biodiverse forest, non-natural highly biodiverse grassland, peatland and protected areas are met,</p>	20.05.2025
Section 5.7.2	<p>“land with high biodiversity value” under Directive [...]</p> <p><b>changed to:</b> “land with high biodiversity value”, nor wetlands or peatlands, under Revised Directive [...]</p>	20.05.2025
Section 5.7.4	<p>They are necessary [...]</p> <p><b>changed to:</b> It is necessary [...]</p>	20.05.2025
Section 5.7.4	<p>[...] must be maintained.</p> <p><b>changed to:</b> [...] must be maintained, unless otherwise defined in the country where the forest is located.</p>	20.05.2025
Section 5.7.4	<p>[...] 100 ha per parcel, provided that [...]</p> <p><b>changed to:</b> [...]100 ha per parcel, unless otherwise defined in the country where the forest is located, provided that [...]</p>	20.05.2025
Section 8	<b>references updated</b>	20.05.2025
Annex I	<b>section added and following sections renumbered:</b> 3.4 Areas where no biomass shall be grown	20.05.2025
Annex I	<p>3.5</p> <p><b>deleted:</b> Can it be ensured that the biomass does not originate from primary forests</p>	20.05.2025
Annex II	<p>New Section added (Annex II)</p> <p>identical</p> <p><b>changed to</b> consistent</p>	20.05.2025

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