



SUSTAINABLE RESOURCES
Verification Scheme GmbH

Technical guidance for the identification of areas with restrictions on biomass harvesting

Version: TG-HR-en-1.0

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Contents

1	Introduction.....	4
2	Areas with restrictions on biomass harvesting	4
2.1	Land with high biodiversity value	5
2.2	Land with high carbon stock.....	6
2.3	Peatland	6
2.4	Protected areas.....	6
3	Implications for verification of compliance with harvesting restrictions	8
4	Relevant documents	9
5	References	10

1 Introduction

Among the sustainability criteria established by the Directive (EU) 2018/2001 (RED II) and its revised version (RED III) is the limitation of the areas where forest and agricultural biomass for biomass fuels may be harvested. The regulation identifies four groups of landscapes where restrictions on harvesting biomass apply: land with high biodiversity value, land with high carbon stock, peatland and protected areas¹. 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.

In both cases (Type I and Type II) all the other sustainability requirements must be observed.

The aim of this document is to provide guidance on the identification of those areas from which biomass for biomass fuels may not be harvested or may be harvested with restrictions. Therefore, this document should be read and interpreted in conjunction with the other documents of the SURE-EU system, particularly the “Scheme principles for the production of agricultural biomass” and the “Scheme principles for the production of forest biomass”². Whenever in this document it is stated that harvesting (forest or agricultural) biomass is possible, it is provided that all the other requirements for biomass harvesting are met, even if not specified.

2 Areas with restrictions on biomass harvesting

The Revised Directive (EU) 2018/2001 recognizes four groups of valuable landscapes where restrictions to harvesting biomass apply: land with high biodiversity value, land with high carbon stock, peatland and protected areas. Within these four groups, some areas correspond to Type I and some to Type II, in terms of harvesting restrictions. Figure 1 summarizes the classification of the areas according to harvesting restrictions. These are explained in detail in the following sub-sections.

		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"> - Primary and old-growth forest - Natural highly biodiverse grassland - Heathland 	<ul style="list-style-type: none"> - Wetland - Continuously forested area ^[1] 		Protected areas that also have Type I restrictions (wetlands, natural highly biodiverse grassland, heathland, primary and old-growth forest, continuously forested area)
	Type II	<ul style="list-style-type: none"> - Highly biodiverse forest - Non-natural highly biodiverse grassland 	<ul style="list-style-type: none"> - Sparsely forested area ^[1] 	Peatland	Other protected areas (e.g. non-natural grassland, peatland)

^[1] These restrictions apply only to agricultural biomass

Figure 1: Classification of areas with restrictions to harvest biomass

2.1 Land with high biodiversity value

The regulation recognizes the following as land with high biodiversity value: primary and old growth forest, highly biodiverse forests, natural and non-natural highly biodiverse grassland and heathland³.

For both agricultural and forest biomass harvesting, the restrictions here described apply to land that had the status in or after January 2008, irrespective of whether the land still has the status.

Within this group of landscapes, it is not possible to harvest biomass under any circumstances (Type I restriction applies) in primary and old growth forest, natural highly biodiverse grassland and heathland. In the case of highly biodiverse forest, it is possible to harvest biomass if it can be demonstrated that its harvesting does not interfere with natural protection purposes. In the case of non-natural grassland, biomass may be harvested if it can be proven that its extraction is necessary for the conservation of the highly biodiverse grassland as such.

2.2 Land with high carbon stock

This group comprises land that had the status of wetlands, continuously or sparsely forested areas in January 2008 and no longer has this status. The restrictions on biomass harvesting in continuously or sparsely forested areas apply only to agricultural biomass⁴.

Continuously forested area is defined as “land spanning more than one hectare with trees higher than five meters and a canopy cover of more than 30 %, or trees able to reach those thresholds in situ”. Sparsely forested area is “land spanning more than one hectare with trees higher than five meters and a canopy cover of between 10 % and 30 %, or trees able to reach those thresholds in situ”. For more details, refer to the Documents “Definitions” and Chapter 5 of the document “Scheme principles for the production of agricultural biomass”.

Wetlands and continuously forested areas are classified as Type I, which means that no forest or agricultural biomass can be harvested under any circumstances in the first case, and no agricultural biomass can be harvested under any circumstances in the second case. On the other hand, it is possible to harvest agricultural biomass from sparsely forested areas (Type II restriction) if it can be proved that the carbon stock of the land is consistent with the requirement of greenhouse gasses savings, provided that all the other requirements are met.

2.3 Peatland

Biomass may be harvested from land that had the status of peatland in January 2008 if it can be proved that cultivation and harvesting of the biomass does not involve drainage of previously undrained soil (Type II restrictions apply).

2.4 Protected areas

In the SURE-EU system, agricultural or forest biomass from areas designated by authorities as protected may only be harvested only if it can be proved that the extraction of the biomass does not compromise the protection purposes, provided all other requirements are met. If a protected area also has one of the valuable landscapes statuses for which Type I restrictions apply (i.e. harvesting is not allowed under any circumstances), then the Type I restrictions take precedence, and biomass may not be harvested even if the requirements of the protected area are met. If an area has the status of primary and old-growth forest, continuously forested area, wetland, natural highly biodiverse grassland or heathland **and** is also designated as a

protected area by the local authorities, then biomass cannot be harvested. Figure 2 summarizes the conditions prevailing in case of overlapping.

For the extraction of agricultural biomass, these restrictions apply to land that had the status of protected area in or after January 2008, irrespective of whether the land still has the status. For forest biomass, there is no cut-off date for verification of the land status defined.

Is it a protected area?	Is it an area where biomass may not be harvested?		Is harvesting allowed? ^[1]
		Which?	
No	No	-	Yes
Yes	No	-	No, unless evidence is provided that the production of that raw material did not interfere with nature protection purposes
No	Yes	<i>Type I:</i> <ul style="list-style-type: none"> - Primary and old-growth forest - Natural highly biodiverse grassland - Heathland - Wetland - Continuously forested areas ^[2] 	No
		<i>Type II:</i> <ul style="list-style-type: none"> - Highly biodiverse forest - Non- natural highly biodiverse grassland - Peatland - Sparsely forested areas ^[2] 	No, unless the requirements of each Type II landscape are met
Yes	Yes	<i>Type I:</i> <ul style="list-style-type: none"> - Primary and old-growth forest - Natural highly biodiverse grassland - Heathland - Wetland - Continuously forested areas ^[2] 	No
		<i>Type II:</i> <ul style="list-style-type: none"> - Highly biodiverse forest - Non- natural highly biodiverse grassland - Peatland - Sparsely forested areas ^[2] 	No, unless evidence is provided that the production of that raw material did not interfere with nature protection purposes AND that the requirements of each Type II landscape are met

^[1] Provided that all other requirements are met.

^[2] They refer to harvesting of agricultural biomass only.

Figure 2: Overview of harvesting restrictions overlapping

3 Implications for verification of compliance with harvesting restrictions

To demonstrate compliance with this sustainability requirement, operators must (i) provide evidence of the land status and (ii) provide proof of compliance with harvesting requirements, when corresponding (Type II restrictions):

- ✓ **Provide evidence of the land status:** In first place, it has to be confirmed whether the sourcing area corresponds to any of the valuable landscapes identified by the RED III, i.e. land with high biodiversity value, land with high carbon stock, peatland or protected areas. In each case, the cut-off date that defines the status of the land has to be observed.
- ✓ **Provide proof of compliance with harvesting requirements, when corresponding:** In those cases in which the land has the status of valuable landscape but harvesting of biomass is allowed, under certain conditions (Type II restrictions), compliance with those conditions has to be proved.

Figure 3 shows the process to identify prevailing restrictions to harvest biomass.

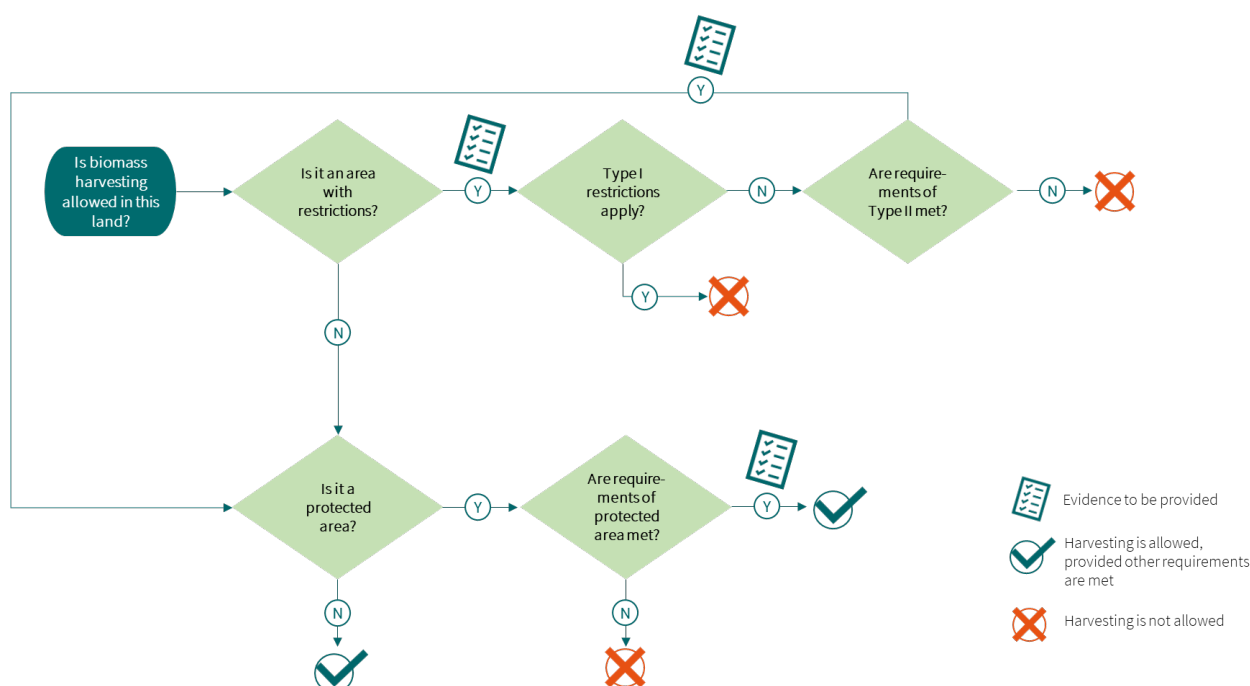


Figure 3: Process for identifying the prevailing restrictions to harvest biomass.

An explanation on how to proof the land status is provided in detail in the documents “Scheme principles for the production of agricultural biomass” and the “Scheme principles for the production of forest biomass”.

4 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”, “Scheme principles for the production of agricultural biomass” and “Scheme principles for the production of forest biomass”.

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. References to legal regulations always relate to the current version.

5 References

1

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.

2

These documents are available in the SURE website. <https://sure-system.org/en/documents.html>

3

The definitions and means of verification of the status of the land are detailed in the documents “Scheme principles for the production of agricultural biomass” and the “Scheme principles for the production of forest biomass”.

4

The conditions to harvest forest biomass in forest areas are the subject of the document “Scheme principles for the production of forest biomass”.

Publication information

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