Response form for submitting

**External input**

for the assessment   
by the Advisory Committee Sustainability of   
Biomass for Energy Applications of

# Certification scheme FSC Int.

Submit this form plus attachments to   
[secretaris@AdviescommissieDBE.nl](mailto:secretaris@AdviescommissieDBE.nl) not later than

**January 22, 2018**  
  
Submission after this date will cause that your input will not be considered by the commission when assessing the certification scheme that is mentioned above.

**Explanatory notes to this response form**

**General**

This response form is made available by the advisory commission sustainability of biomass for energy applications (“the commission”) that advises – on request of the Dutch Minister of Economic Affairs – on the extent to which certification schemes or parts of certification schemes guarantee that Dutch sustainability criteria for solid biomass are met. Administrators of certification schemes can request the Minister to approve (part of) their schemes. The Minister can ask the commission for advice. The commission has described its assessment procedure in a document called “toetsingsprotocol” (assessment protocol) that can be found on the [website of the commission](https://www.adviescommissiedbe.nl/toetsingsprocedure). This protocol is in Dutch language. An English summary of the assessment procedure is available through [this webpage](https://www.adviescommissiedbe.nl/assessment-procedure). During this assessment the commission uses sustainability criteria that will be part of Dutch legislation from early 2018 onwards.

Directly after a request for advice by the Minister the commission opens a four-week period for submission of external input (stakeholder consultation) on the certification scheme for which it starts its procedure. The external input serves to collect substantiated facts and experiences from stakeholders on the functioning in practice of the certification scheme. Submission of external input can only be done through this form: external input that is submitted in another way will not be considered by the commission. A separate form will be made available for every certification scheme for which the commission is asked to prepare an advice.

Together with an advice to the Minister, the commission will publish a report on the external input. This report will also include the commissions’ reaction to this input. Your input will also be included in this report. On request the commission will ensure that you stay anonymous in public documents. You cannot stay anonymous to the commission.

**Three or four sections: A, B, C and possibly D**

You are requested to fill out the separate sections A, B, C and (if relevant) D.

In sections B, C and D you make as accurately as possible reference to (parts of) scheme documents to which your comments apply and to other supporting documents that you send in as part of your submission.

In section A you are asked to fill out your contact details. The commission will use your contact details when asking for a further explanation and when sending you parts of the commissions’ draft findings allowing you to make comments.

In sections B and C you give your external input for the sustainability criteria and the management criteria, respectively. In the application the manager of the certification scheme indicates for which criteria approval is requested. Only these criteria are listed in section B and only for these criteria your input is asked. In sections B and C it is also possible to make more general comments in case these comments cannot be linked to specific criteria. In the annex to this form some explanations to the sustainability criteria are given.

A certification scheme must comply with all management criteria.

Your external input consists of facts and experiences on the certification scheme FSC International (FSC Int.). The commission will only consider your external input during the assessment of this scheme when your input complies with the following three criteria:

* Facts and experiences concern one or several specific sustainability and/or management criteria. This means that:
  + either you indicate in sections B3 and C3 to which criteria your input applies. The consequence of this approach is that you possibly will only fill out some parts of sections B3 and C3. Please leave the rest empty.
  + or you use sections B2 and C2 to submit more general input that applies to the more overarching subjects mentioned there. In that case it is to the commission to judge to which criteria this more general input applies. In case this allocation to specific criteria by the commission cannot be made, your input cannot be considered by the commission as part of the assessment of the certification scheme. Therefore, preferentially you submit your input into sections B3 and C3..
* External input must be substantiated by verifiable proof and sources, meaning that when writing your input you refer to documents that (*i*) are named in sections B1 and C1 and (*ii*) that you send in as annexes together with your response.
* In case of complaints, facts and experiences have – wherever possible[[1]](#footnote-1) - gone through the complaint procedure[[2]](#footnote-2) of the certification scheme concerned. The outcome of this complaint procedure must be send in together with the complaint.

In section D you give – if applicable – facts and experiences on the so-called risk based approach for the certification scheme FSC Int.. This is the risk based approach in which certification does not start at the level of the forest management unit, but starts at the first collector of the biomass which in many cases is the pellet mill.

**Section A – Contact details and anonymity**

|  |  |  |
| --- | --- | --- |
| Organisation(s)[[3]](#footnote-3): |  | |
| Person(s)3 submitting input: |  | |
| Function: |  | |
| Email address: |  | |
| Phone number: |  | |
| Postal address: |  | |
| Zip code: |  | |
| Town: |  | |
| Country: |  | |
|  |  | |
| Your input will be included in a report on the externa input, in which a reaction of the commission to your input will also be included. May your organisation and/or name be mentioned in that report? (The alternative is that you stay anonymous).  Anonymity does not apply for the commission. The commission will keep your data confidential in case you ask for this by ticking the box “no”. | | Yes, my organisation (or your name in case you submit input as a private person) may be mentioned in communication with the scheme administrator and on the website  No, me and my organisation wish to stay anonymous to the scheme administrator and on the website. |

**Section B – External input per sustainability criterion**

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| **B.1 Documents** | |
| *Name of document which are referred to from Table B.2 below. If useful please use numbers or codes to facilitate making references. All documents that are listed here must be send in as attachments to the completed response form.* |  |

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| **B.2 More general external input** (This can only be considered by the commission as part of the assessment in case the external input applies to one or a number of individual sustainability criteria) | | |
| Overarching subject (sustainability criteria) | External input | Evidence or source (please refer to documents in table B.1 and include page- or paragraph number) |
| GHG emissions, carbon sinks, carbon debt and land use change  (sustainability criteria 1.1 and 3.1 - 5.1) |  |  |
| Soil quality and sustainable forest management (sustainability criteria 2.1 and 6.1 - 10.5) |  |  |
| Management by a group or regional association (sustainability criteria 11.1 and 11.2) |  |  |
| Chain-of-Custody (sustainability criteria 12.1 - 13.3) |  |  |

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| **B.3 External input to individual sustainability criteria** (only the sustainability criteria are listed for which certification scheme FSC Int. has requested to be approved) | | | |
| Sustainability criteria in Dutch legislation | | External input | Evidence or source (please refer to documents in table B.1 and include page- or paragraph number) |
| **P3** | **Production of raw biomass does not result in the destruction of carbon sinks** | | |
| 3.1 | Biomass is not sourced from permanently drained land that was classified as peat land on 1 January 2008, unless it can be demonstrated that the production and harvesting of the biomass does not result in water depletion of a previously undrained soil. |  |  |
| 3.2 | Biomass is not sourced from land that was converted from wetland to an alternative, dryer ecosystem after 1 January 2008. |  |  |
| 3.3 | Biomass is not sourced from production forests, including wood plantations, which were created by means of conversion of natural or semi-natural forests after 31 December 1997. |  |  |
| **P4** | **The use of biomass does not result in a long-term carbon debt** | | |
| 4.1 | The forest management unit where the wood is sourced is managed with the aim of retaining or increasing carbon stocks in the medium or long term. |  |  |
| 4.2 | Biomass is not sourced from stumps unless these stumps had to be removed from the site for other reasons than wood or biomass production. |  |  |
| 4.3 | On average less than half the volume of the annual round wood harvest from forests is processed as biomass for energy generation.  Round wood from production forests with a rotation period of less than 40 years is exempt from this requirement. |  |  |
| **P6** | **Relevant international, national, regional and local laws and regulations are followed** | | |
| 6.1 | The forest manager holds the legal right to use the forest. |  |  |
| 6.2 | The forest manager complies with all obligations to pay taxes and royalties. |  |  |
| 6.3 | Anti-corruption legislation is followed. If no anti-corruption legislation exists, the forest manager takes alternative anti-corruption measures proportionate to the scale and intensity of the management activities and the risk of corruption. |  |  |
| **P7** | **Biodiversity is maintained and where possible enhanced** | | |
| 7.1 | Sites with high conservation values and representative areas of the forest types that are found in the forest management unit have been identified and are protected and where possible enhanced. |  |  |
| 7.2 | Measures have been taken to protect endangered plant and animal species and, if applicable, to increase the populations and enhance the habitats of these species. |  |  |
| 7.3 | The conversion of forests within the forest management unit to other forms of land use, including wood plantations, is not permitted unless:   * the area concerned is small which means the total converted area over the years is no greater than 5% of the area of the forest management unit on benchmark date 1 January 2008; and * it clearly leads to long-term advantages for nature conservation; and * there is no damage or threat of damage to sites with high conservation values. |  |  |
| 7.4 | In the case of wood plantations, there is a preference for native species, and a relevant percentage of the plantation must be able to revert to natural forest at a later stage. |  |  |
| 7.5 | Exploitation of non-timber forest products, including products from hunting and fishing, is regulated, monitored and controlled, among others to safeguard the maintenance of the biodiversity in the forests. |  |  |
| **P8** | **The regulating effect and the quality, health and vitality of the forest are maintained and where possible enhanced** | | |
| 8.1 | The soil quality of the forest management unit is maintained and if necessary improved, with special attention to coasts, river banks, erosion-sensitive areas and sloping landscapes. |  |  |
| 8.2 | The water balance and quality of both groundwater and surface water in the forest management unit and downstream outside the forest management unit are at least maintained and where necessary improved. |  |  |
| 8.3 | Important ecological cycles present in the forest management unit are preserved, including carbon and nutrient cycles. |  |  |
| 8.4 | Unnecessary damage to ecosystems is prevented by applying *reduced impact logging* and the most suitable road construction methods and techniques for local conditions. |  |  |
| 8.5 | If fires are used to achieve forest management objectives, such as regeneration of specific tree species, then adequate control measures have been taken. |  |  |
| 8.6 | The forest management measures are designed to prevent and control diseases and pests where these form a threat to natural capital. |  |  |
| 8.7 | The use of chemicals is only permitted if ecological processes and the optimal deployment of sustainable alternatives prove insufficient. Pesticides classified as Type 1A and 1B by the World Health Organisation and chlorinated hydrocarbons are not permitted. |  |  |
| 8.8 | The accumulation of inorganic waste and litter is prevented or such waste and litter is collected, stored in approved areas and disposed of responsibly. |  |  |
| **P9** | **The production capacity for wood products and relevant non-timber forest products is maintained in order to safeguard the future of the forests** | | |
| 9.1 | The production capacity of all forest types represented in the forest management unit is maintained. |  |  |
| 9.2 | The forest management unit is sufficiently protected against all forms of illegal exploitation of timber and non-timber forest products, including hunting and fishing, illegal establishment of settlements, illegal land use, illegally initiated fires and any other illegal activities. |  |  |
| **P10** | **Sustainable forest management is achieved through a management system** | | |
| 10.1 | The forest management system is designed to achieve the objectives of a forest management plan and covers the inventory, analysis, planning, implementation, monitoring, evaluation and adjustment cycle. |  |  |
| 10.2 | A forest management plan is drawn up that at least includes:   * a description of the current condition of the forest management unit; * long term goals for the ecological functions of the forest management unit; * the average annual allowable cut per forest type and, if applicable, the annual allowable harvest of non-timber forest products based on reliable and current data; * budget planning for the implementation of the forest management plan. |  |  |
| 10.3 | Essential elements for the management of the forest are indicated on maps. |  |  |
| 10.4 | The implementation of the forest management plan is periodically monitored and the ecological effect of the forest management is evaluated. |  |  |
| 10.5 | The forest management is implemented by professional office and field staff, whose expertise and knowledge is maintained by means of an effective and regular training programme. |  |  |
| **P11** | **Forest management by a group or regional association offers sufficient safeguards for sustainable forest management** | | |
| 11.1 | A group or regional association is lead and supervised by an independent legal entity. |  |  |
| 11.2 | A group or regional association  meets the requirements of sustainable forest management (requirements 6.1 through 10.5). The separate forest management activities of the individual members of the group or regional association shall also meet these requirements if applicable for the management of the forest concerned. |  |  |
| **P12** | **A chain of custody system is in place for the biomass, that covers the entire chain from the first actor to the bioenergy producer, that links the source to the material used in the product or product group, and provides greenhouse gas emission data of each individual link.** | | |
| 12.1 | Each link in the chain of custody has a quality management system in place that provides safeguards for compliance with the requirements of the chain of custody system. |  |  |
| 12.2 | Each link in the chain of custody has the relevant greenhouse gas emissions information for its own organisation, which has been obtained using a methodology that is based on the most recent European Commission publication on sustainability criteria for solid biomass and the reference values provided for fossil fuels. |  |  |
| 12.3 | Each link in the chain of custody keeps all necessary documentation for demonstrating compliance with the applicable sustainability requirements available for a minimum of 5 years. |  |  |
| 12.4 | Each link in the chain of custody registers for all incoming or outgoing consignments the quantities and required sustainability information. |  |  |
| 12.5 | If a link in the chain of custody mixes consignments with different sustainability characteristics a mass balance is used.  For the mixing the following applies:   * The method shall be applied at least at the level of a location; * The organisation defines a period with a maximum of a year, during which incoming and outgoing consignments are measured and reports the results;   the sustainability characteristics of mixed biomass output can be traced back to the characteristics and quantities of the individual incoming consignments, taking account of the applicable conversion factors. |  |  |
| 12.6 | Category 1 and 2 consignments only complying with the requirements 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, 5, 7.1 and 7.3 are distinguished as controlled biomass on a mass balance. |  |  |
| **P13** | **In case of a group management system for the chain of custody the same requirements apply to the group as a whole as to individual businesses** | | |
| 13.1 | A group is led by a legal entity who is responsible for the group as a whole. This entity uses a management system that enables it to effectively supervise the participating locations within the scope of the system. |  |  |
| 13.2 | The group applies to the requirements 12.1 up to and including 12.6. Furthermore, each group member individually meets these requirements insofar applicable to their own activities. |  |  |
| 13.3 | The group leader uses a registration system to record:   * the names and addresses of the members; * a declaration submitted by each member in which they declare that they meet chain of custody requirements;   the incoming and outgoing consignments of each individual group member. |  |  |

**Section C – External input per management criterion**

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| --- | --- |
| **C.1 Documents** | |
| *Name of document which are referred to from Table c.2 below. If useful please use numbers or codes to facilitate making references. All documents that are listed here must be send in as attachments to the completed response form.* |  |

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| **C.2 More general external input** (This can only be considered by the commission as part of the assessment in case the external input applies to one or a number of individual management criteria) | | |
| Overarching subject (management criteria) | External input | Evidence or source (please refer to documents in table C.1 and include page- or paragraph number) |
| The scheme has been developed in a thorough way (management criteria a - d) |  |  |
| The scheme is managed in a thorough way  (management criteria e - i) |  |  |

|  |  |  |  |
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| **C.3 Management criteria** | | | |
| Criterion in Dutch legislation | | External input | Evidence or source (please refer to documents in table C.1 and include page- or paragraph number) |
| a | A general need exists for the scheme and for the conformity assessments that are performed based on the scheme. |  |  |
| b | The development of the scheme is transparent and participation in the process of development of the scheme is open to anyone. |  |  |
| c | The methods related to the development of the scheme are documented and at least include the participating organisations and the decision-making process. |  |  |
| d | It can be demonstrated that during the development of the scheme and as part of the scheme management expertise of the sustainability requirements covered by the scheme was and is applied. |  |  |
| e | The scheme is publicly available or accessible under fair, reasonable and non-discriminatory conditions. |  |  |
| f | The scheme manager enters into agreement with conformity assessment bodies. As part of these agreements the right to use the scheme can be granted. |  |  |
| g | The scheme manager has limited the use of the scheme to conformity assessment bodies he has entered into an agreement with, unless the scheme owner itself is the only conformity assessment body. |  |  |
| h | The scheme manager has enforced effective procedures for handling complaints and appeal. Appeal is treated by persons that are not directly involved in the development and the management of the document. |  |  |
| i | The scheme manager demonstrates that he has a scheme version management system |  |  |

**Section D – External input on the risk based approach**

This part does not apply for this certification scheme.

**Annex - Additional guidance on the sustainability requirements**

The sustainability requirements that are included in the application forms and also in this form are based on the criteria that have been published as prerequisites for obtaining subsidy under the SDE+ subsidy scheme on 27 of March 27[[4]](#footnote-4). In this text guidance was added for clarification to many of the criteria. By the end of 2017 the definitive sustainability criteria will be published in the new environmental legislation. Beside the sustainability criteria additional guidance will be part of this legislation. Because scheme managers are allowed and invited to submit a request for approval before publication of this legislation, and because external stakeholders can on their turn submit external input, this annex gives some extra guidance and clarification on the sustainability requirements as incorporated in the application forms.

***Biomass categories and the chain of custody system***

There are five biomass categories for which the sustainability requirements apply. In Table 1 for each category is listed which sustainability requirements apply:

*Table 1. Biomass category’s with the applicable sustainability requirements*

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Sustainability  criteria**  **Category** | Greenhouse gas emission | Soil management | Carbon and land use change | Sustainable forest management | Chain of custody |
| 1. Woody biomass from forest management units of 500 ha or more | P1 |  | P3-P5 | P6-P11 | P12-P13 |
| 2. Woody biomass from forest management units less than 500 ha | P1 |  | P3-P4 | P6-P11 | P12-P13 |
| 3. Residues from nature and landscape management | P1 | P2 |  |  | P12-P13 |
| 4. Agricultural residues | P1 | P2 |  |  | P12-P13 |
| 5. Biogenic residues and waste | P1 |  |  |  | P12-P13 |

The source of the five categories and controlled biomass has to be known for each consignment. The conformity assessment by a conformity assessment body starts at the first link in the chain of custody. For each category of biomass Table 2 lists the source of the material and what must be the first link of the chain of custody.

*Table 2. Distinction between the source and the first link in the chain of custody per biomass category*

|  |  |  |
| --- | --- | --- |
| **Category** | **Source** | **First link chain of custody** |
| 1. Woody biomass from forest management units of 500 ha or more | Forest management unit ≥ 500 ha | Forest management unit |
| 2. Woody biomass from forest management units less than 500 ha | Forest management unit or predefined supply base of which the forest management unit <500 ha forms a part | Forest management unit or biomass producer |
| 3. Residues from nature and landscape management | Predefined supply base | First collection point |
| 4. Agricultural residues | Predefined supply base | First collection point |
| 5. Biogenic residues and waste | Company that generates the residues or waste | First collection point |

As part of the SDE+ subsidy scheme a temporary exemption applies for category 2 biomass regarding the first link of the chain of custody. For this category either the forest management unit or the biomass producer can be the first link. In case the biomass producer is the first link a risk based approach is used to demonstrate compliance with the sustainable forest management requirements.

***Guidance on individual sustainability requirements***

In table 3 additional guidance on a number of individual requirements in the application forms is given for clarification. Beside this, relevant definitions from the verification protocol might help to clarify the wording used in the application forms.

*Table 3. Guidance on the individual sustainability requirements*

|  |  |
| --- | --- |
| ***Requirement in form*** | ***Guidance*** |
| 2.1 | The cultivation and harvest of biomass may not have a negative effect on soil quality including soil fertility. The development and implementation of a management plan with best practices guaranties the maintenance or improvement of the soil quality. |
| 3.1 | Evidence can be delivered by means of a forest management plan or equivalent documentation. This plan describes the current carbon stocks in the overground vegetation of the forest management unit and the desired development of the carbon stocks. This can also be expressed in terms of tree stand or other carbon stock proxies. The plan pays specific attention to the intended volumes of biomass to be harvested, the influence of harvesting and the replenishment of the carbon stocks in the medium or long term. The length of the term (medium or long) depends, among others, on the type of forest, the growth rate and the forest management system. |
| 4.2 | A reason to remove stumps could be the construction of a road.  Evidence must be provided that there is a low risk of rough biomass from stumps being processed. This is the biomass producer’s (pellet mill) responsibility. |
| 4.3 | This is calculated by dividing the volume of roundwood supplied to a pellet mill by the total volume of round wood that was harvested in the same year (in the calculation both volumes are excluding wood harvested during thinning). |
| 5.1 | ILUC risks must be calculated using the LIIB methodology and requirements (LIIB = Low Indirect Impact Biofuels) or an equivalent method. The methodology shall be evaluated every three years (if there is sufficient cause to do so) and modified to incorporate any improvements. |
| 6.2 | Obligations to pay taxes and royalties do not only concern the logging activities, but also all other financial obligations connected to the management of the forest. |
| 7.1 | A solid process has to be followed for the identification, protection and monitoring of the areas with high conservation values. Areas with high conservation values contain one or more of the following values:   * Diversity of species. Concentrations of biological diversity including indigenous species and endangered species that are of importance on a global, regional or national level. * Ecosystems and habitats. Rare or endangered ecosystems or habitats. * Ecosystem services. Basic ecosystem services in critical situations such as protection of important water sources and control of erosion of vulnerable soils and slopes. * Ecosystems on landscape level. Whole forest landscapes or other large whole ecosystems on landscape level that are of importance on a global, regional or national level because they contain viable populations of the majority of the natural species in natural patterns of distribution and numbers. * Cultural values. Areas or means of living that are of global or national cultural, archaeological of historical importance to/ or fundamental to traditional cultures/ beliefs of local indigenous people. |
| 7.2 | Plant species include species of trees.  An example of habitat enhancement is facilitating nesting in dead trees.  Protected and endangered plant and animal species are not exploited for commercial purposes. |
| 7.3 | Clear long-term advantages for nature conservation means that the conversion fits into a long-term forest management plan and the concrete forest management measurements which are a result of the forest management plan. |
| 7.4 | A relevant percentage is 5% of the total area. |
| 8.1 | Indicators for the prevention of soil erosion are the threshold values for the maximum allowable height and slope. |
| 8.2 | The maintenance and, if necessary, improvement of ground and surface water includes the protection and restoration of natural waterways, water bodies, riparian zones and corridors between these. |
| 8.3 | For example no lowering of the groundwater level in peatlands; no increase of water turbidity; and measures taken to prevent large-scale leaching of nutrients after harvesting |
| 9.1 | Overexploitation of separate commercial tree species must be prevented. |
| 10.1 | The management cycle is implemented with the aim of ensuring continuous improvement of the management system in order to ensure the long-term conservation of the forests. A systematic process is used in order to:   * Identify potential environmental impacts * Evaluate alternative approaches * Design and incorporate appropriate prevention, mitigation, management and monitoring measures |
| 10.2 | The forest management plan must contain clear descriptions (ecosystems and species) and management goals, including ecological functions and aspects. This entails identifying and mapping areas with high ecological values and describing the plans for protecting these.  The plan must be underpinned by a realistic budget. |
| 10.3 | At least areas with high conservation areas, areas where harvesting takes place and forest management unit boundaries are indicated. |
| 10.4 | The monitoring is proportional related to the scale, intensity and risks of the forest management activities. The aim of the monitoring is an identification and inventory of the impact on changes of the environment. Ecological effects include changes in flora and fauna and the composition of the forest. |
| 11.1 | The entity holds the responsibility for a good forest management. |
| 11.2 | A description must be provided of the status of the forest in the relevant region and it must be demonstrated that the carbon stocks will be maintained or increased. |
| 12.1 | If a link in the chain of custody makes use of subcontractors for activities related to the biomass the organisation must control the observance of all applicable requirements by this subcontractor. |
| 12.2 | This is currently the Staff Working Document, SWD (2014) 259. |
| 12.5 | The sustainability properties do not only concern sustainable management of the source, but also the relevant greenhouse gas emission data, which have been obtained using a methodology that is based on the most recent European Commission publication on sustainability criteria for solid biomass and the reference values provided for fossil fuels.  If a category 2 biomass consignment for which the biomass producer is the first link is mixed with a category 2 biomass consignment for which the forest management unit is the first link, on the mass balance the consignments are registered as two separate consignments. |
| 12.6 | For controlled biomass the biomass producer is the first link of the chain of custody and the forest management unit or a predefined supply base is the source. |
| 13.1 | The entity has an effective management system in place as well as the appropriate technical and human resources.  The entity conducts an annual audit of a sample of the members (using a prearranged random sample method). |

1. : When the stakeholder can demonstrate that following the complaint procedure was not possible – for instance as it would result in the risk to get fired – or when the complaint procedure has not yet been completed, then the commission can decide to consider the information. [↑](#footnote-ref-1)
2. : Depending on the nature of the comments this can be a complaint procedure of the certificate holder, the manager of the certification scheme or certification bodies. [↑](#footnote-ref-2)
3. : In case the external input is submitted by more persons and/or more organisations, under “Person(s)” you first type the name of the contact person (for which the contact details will be filled out) and then possible other persons. Under “organisation(s)” you fill out all the organisations that collectively submit the input. [↑](#footnote-ref-3)
4. https://zoek.officielebekendmakingen.nl/stcrt-2015-9096.html [↑](#footnote-ref-4)