

Response ID ANON-FUAF-64C6-5

Submitted to Common Biomass Sustainability Framework Consultation
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About you

1 What is your name?

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2 What is your email address?

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3 Are you responding as an individual or on behalf of an organisation?

Organisation

Organisation:
Bio-based and biodegradable Industries Association

Responding on behalf of an organisation

4 Please select which sector your organisation is part of from the list below.

Please select which sector your organisation is part of from the list below.:
TA - Biotech/Chemicals/Products

5 Which organisation are you responding on behalf of?

Which organisation are you responding on behalf of?:
Bio-based and biodegradable Industries Association

About you part 2

6 We usually publish a summary of all responses, but sometimes we are asked to publish the individual responses too. Would you be happy for your response to be published in full?

Yes

7 How did you hear about this consultation?

How did you hear about this consultation?:
Email from this department

Other (please specify):

Executive Summary

Chapter 1: A Common Biomass Sustainability Framework: Part 1

8 Do you agree that the initial scope of the framework should be limited to bioenergy that is subject to government incentive schemes?

Neutral

If you agree, please state why, providing evidence where appropriate:

Agree. This scope is proportionate and allows alignment with current policies. There may need to be further discussion regarding the treatment of non-government-supported bioenergy applications.

However, BBIA believes that non-bioenergy uses of biomass (e.g. for chemicals and materials) should also be included in the scope of this.

If you disagree, please explain why, providing evidence where appropriate?:

9 Do you agree that the common criteria should be delivered as a policy document and implemented through the relevant legislative or contractual frameworks of each individual biomass policy?

Somewhat agree

If you agree, please state why, providing evidence where appropriate:

Agree. Delivery as a policy document and subsequent legislative implementation ensures equal enforcement across the industry for incentivised purposes.

If you disagree, please explain why, providing evidence where appropriate?:

10 Should government consider a legislative route for implementing the common sustainability framework in the future, including expanding it for non-subsidised uses?

Yes

Additional comments:

Retaining the Common Sustainability Framework (CSF) as a policy document, rather than embedding it in primary legislation, is likely to support more rapid development and implementation. This approach enables Government and industry to adapt and refine the framework in light of operational experience and emerging evidence. The schemes currently informed by the CSF are already supported by existing legislation or regulatory frameworks, meaning a robust policy framework can operate effectively alongside them without the delays associated with the legislative process.

Nevertheless, important longer-term considerations arise if the CSF is intended to extend beyond subsidised applications. Embedding the framework in legislation could offer greater certainty, consistency and longevity, particularly where sustainability standards are expected to apply across the full bioenergy sector, including commercial, voluntary or future market-driven activities that sit outside existing support schemes.

If you disagree, please explain why, providing evidence where appropriate?:

A Common Biomass Sustainability Framework: Part 2

11 What are your views on the role of the Biomass Suppliers List (BSL) post RHI and how government should frame the relationship between the common framework and BSL in relation to sustainability requirements?

What are your views on the role of the Biomass Suppliers List (BSL) post RHI and how should government frame the relationship between the common framework and BSL in relation to sustainability requirements?:

BSL's alignment to the common framework can be managed through revised guidance, evidence, and feedstock requirements.

A Common Biomass Sustainability Framework: Part 3

Review and Updates to the Common Framework

12 Do you agree that the updated policy guidance document should be published every 5 years?

Strongly agree

If you agree that the updated policy guidance document should be published every 5 years, please provide evidence to support your response or an alternative proposal for review timelines. :

Agree. There should be timely regard for emerging issues and scheme updates where necessary. Perhaps every 2 or 3 years, dependant on other policy changes.

If you disagree that the updated policy guidance document should be published every 5 years, please provide evidence to support your response or an alternative proposal for review timelines. :

Chapter 2: Biomass Feedstock Categories & Definitions

13 Do you agree with the list of key feedstock categories and their definitions in scope of the common framework?

Somewhat agree

If you agree, please state why, providing evidence where appropriate:

There is general agreement with the principle, though the current distinction between "energy crops" and "other crops" would benefit from further clarification. Some short-rotation crops, such as maize, are commonly grown for multiple purposes, including both bioenergy and food production. The framework should therefore explore either a more nuanced sub-classification within "energy crops" or an alternative categorisation that better reflects the range of potential end uses.

If you disagree, please outline which feedstock categories and their definitions you disagree with and why? :

Chapter 3: Land criteria (Agricultural Land criteria)

Direct land use change (DLUC): Prohibited land categories

14 Do you agree that the agricultural land criteria should continue to include prohibited land categories in line with existing criteria?

Somewhat agree

If you agree, please state why, providing evidence where appropriate:

There is broad agreement with this approach; however, greater emphasis should be placed on the role of waste-based feedstocks. In particular, further consideration is needed regarding the classification of anaerobic digestion (AD) inputs, alongside clear exemptions for wastes and residues, including livestock manure and slurries, where their use does not result in direct land-use impacts.

If you disagree, please explain why, providing evidence where appropriate?:

15 Do you agree that the baseline should be set in January 2008?

Yes

If you agree, please state why, providing evidence where appropriate:

If you disagree, please state why, and what should the baseline be set at?:

Prohibited Land Categories: Areas of high biodiverse value

16 Do you agree with the definitions of the highly biodiverse land categories given?

Strongly agree

If you agree, please state why, providing evidence where appropriate:

It is wise to align with EU regulations and UK practice, since we are currently under going EU realignment.

If you disagree, please explain why, providing evidence where appropriate?:

17 Do you agree with the list of protected highly biodiverse land categories where sourcing is not allowed?

Somewhat agree

If you agree, please state why, providing evidence where appropriate:

Should consider us of fallen/diseased trees in protected areas.

If you disagree, please explain why, providing evidence where appropriate?:

18 Do you agree with the list of protected highly biodiverse land categories where sourcing is allowed if sufficient evidence of no harm to the area of land can be provided?

Strongly agree

If you agree, please state why, providing evidence where appropriate:

Agree, but evidence of no harm must be requested.

If you disagree, please explain why, providing evidence where appropriate?:

19 Should other highly biodiverse land categories be added?

No

Please explain your answer:

Prohibited Land Categories: Areas of High Carbon Stock

20 Do you agree with the definitions of high carbon stock land categories given?

Strongly agree

If you agree, please state why, providing evidence where appropriate:

If you disagree, please explain why, providing evidence where appropriate?:

21 Do you agree with the list of protected high carbon stock land categories, where sourcing is not allowed?

Strongly agree

If you agree, please state why, providing evidence where appropriate:

If you disagree, please explain why, providing evidence where appropriate?:

22 Do you agree that sourcing should be allowed from peatlands if evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil?

Somewhat disagree

If you agree, please state why, providing evidence where appropriate:

Sourcing from peatlands should be limited.

If you disagree, please explain why, providing evidence where appropriate?:

23 Should other high carbon stock land categories be added?

No

If you agree, please state why, providing evidence where appropriate:

Indirect Land Use Change (ILUC): Part 1

24 Should the crop cap be set at a sector level subject to sector specific ILUC risk assessments?

Yes

If you agree, please state why, providing evidence where appropriate:

25 If crop caps are set at a sector level, what factors should be included in the sector-specific food competition and ILUC risk assessment? Please provide evidence to support your response.

If crops caps are set at a sector level, what factors should be included in the sector-specific food competition and ILUC risk assessment?:

What should the sector-specific food competition and ILUC risk assessment consist of? :

26 What factors should be monitored at a cross-sector level to highlight emerging risks regarding food competition and ILUC risks from crop derived feedstocks?

What factors should be monitored at a cross-sector level to highlight emerging risks regarding food competition and ILUC risks from crop derived feedstocks?:

Indirect Land Use Change (ILUC): Part 2

27 How could high ILUC risk feedstocks be identified? Please suggest what factors could be considered and provide evidence to support your response.

How could high ILUC risk feedstocks be identified? Please suggest what factors could be considered and provide evidence to support your response. :

28 Should high ILUC risk feedstocks be phased out?

Yes

If you agree that high ILUC feedstocks should be phased out, please provide a timeframe and state if it should be at a cross-sector or individual sector level. Please provide evidence to support your response and explain how this could be done in compliance with international rules, e.g. WTO compliance.:

If you do not think high ILUC feedstocks should be phased out, please state why, providing evidence where appropriate:

Indirect Land Use Change (ILUC): Part 3

29 Are there other approaches (beyond those suggested previously) that should be considered to limit ILUC impacts of bioenergy feedstocks, in particular with regards to competition with food?

22. Are there other approaches (beyond those suggested above) that should be considered to limit ILUC impacts of bioenergy feedstocks, in particular with regards to competition with food?:

30 Are there any other issues (e.g. social or other environmental) that should be considered as part of the agricultural land criteria?

Are there any other issues (e.g. social or other environmental) that should be considered as part of the agricultural land criteria?:

Consider the SDGs.

Feedstocks in Scope of Agricultural Land Criteria

31 Do you agree that, unless otherwise specified, all feedstocks should have to comply with the agricultural land criteria?

Somewhat disagree

If you agree, please state why, providing evidence where appropriate:

Waste and by-products should be exempt.

If you disagree, please explain why, providing evidence where appropriate?:

32 Should dedicated energy crops be required to meet the agricultural land criteria?

Yes

If you agree, please state why, providing evidence where appropriate:

If you disagree, please explain why, providing evidence where appropriate?:

33 Do you have evidence regarding the impact of requiring energy crops to meet the agricultural land criteria? We are particularly interested in potential impacts on planting targets and spatial distribution of energy crops.

26. Do you have evidence regarding the impact of requiring energy crops to meet the agricultural land criteria? We are particularly interested in potential impacts on planting targets and spatial distribution of energy crops. :

Compliance with the Agricultural Land Criteria

34 Should the types of evidence for demonstrating compliance with agricultural land criteria be kept aligned with existing criteria?

Yes

If you agree that the types of evidence for demonstrating compliance with agricultural land criteria should be kept aligned with existing criteria, please state why, providing evidence where appropriate:

If you disagree that the types of evidence for demonstrating compliance with agricultural land criteria should be kept aligned with existing criteria, please outline what changes should be made.:

35 Please highlight any specific cost implications to your business/sector in meeting the proposed agricultural land criteria. Please provide evidence to support your response.

Please highlight any specific cost implications to your business/sector in meeting the proposed agricultural land criteria. Please provide evidence to support your response. :

Policy Proposals: Soil Criteria

36 Do you agree that the land on which the raw feedstock was grown should be subject to soil monitoring and management plans?

Strongly agree

If you agree that the land on which the raw feedstock was grown should be subject to soil monitoring and management plans, please state why, providing evidence where appropriate:

Required to ensure soil quality and contamination.

If you disagree that the land on which the raw feedstock was grown should be subject to soil monitoring and management plans, please state why, providing evidence where appropriate.:

37 Are there any additional aspects that should be included in the soil criteria? Please explain what these are, how they could be implemented and the rationale for inclusion.

Are there any additional aspects that should be included in the soil criteria? Please explain what these are, how they could be implemented and the rationale for inclusion.:

Soil carbon content.

Feedstocks in Scope of the Soil Criteria

38 Do you agree that agricultural residues should comply with the soil criteria?

Strongly agree

If you agree that agricultural residues should comply with the soil criteria, please state why, providing evidence where appropriate:

If you disagree that agricultural residues should comply with the soil criteria, please state why, providing evidence where appropriate:

39 Should 'other crops' (where the whole plant is used as a bioenergy feedstock) have to comply with the soil criteria?

Yes

If you agree that 'other crops' should have to comply with the soil criteria, please provide evidence to support your response, including the benefits and challenges of applying the soil criteria to these feedstocks. :

If you disagree that 'other crops' should have to comply with the soil criteria, please provide evidence to support your response, including the benefits and challenges of applying the soil criteria to these feedstocks. :

40 Should dedicated energy crops have to comply with the soil criteria?

Yes

If you agree that dedicated energy crops should have to comply with the soil criteria, please provide evidence to support your response, including the benefits and challenges of applying the soil criteria to dedicated energy crops. :

If you disagree that dedicated energy crops should have to comply with the soil criteria, please state why, providing evidence where appropriate.:

Compliance with the Soil Criteria

41 Should the types of evidence for demonstrating compliance with soil criteria be kept aligned with existing criteria?

Yes

If you think the types of evidence for demonstrating compliance with soil criteria should be kept aligned with existing criteria, please state why, providing evidence where appropriate.:

If you think that the types of evidence for demonstrating compliance with soil criteria should not be kept aligned with existing criteria, please outline what changes should be made.:

42 Please highlight any specific cost implications to your business/sector in meeting the proposed soil criteria. Please provide evidence to support your response.

Please highlight any specific cost implications to your business/sector in meeting the proposed soil criteria. Please provide evidence to support your response. :

Policy Proposals: Forest Criteria

Sustainable Forest Management Criteria

43 Do you agree that the requirements for setting the principles for sustainable land management are appropriate for the common framework?

Somewhat agree

If you disagree that the requirements for setting the principles for sustainable land management are appropriate for the common framework, please outline how they could be changed.:

Biodiversity and Ecosystem Services Criteria

44 Do you agree that the common framework should continue to align with the biodiversity and ecosystem requirements set out in the Timber Standard?

Somewhat agree

If you agree that the common framework should continue to align with the biodiversity and ecosystem requirements set out in the Timber Standard, please state why, providing evidence where appropriate.:

If you disagree that the common framework should continue to align with the biodiversity and ecosystem requirements set out in the Timber Standard, please state why, providing evidence where appropriate.:

45 Are there any areas where government should go further than the existing requirements? How should these requirements be included?

Are there any areas where we should go further than the existing requirements? How should these requirements be included?:

Social Criteria: Part 1

46 Do you agree that the common framework maintains the existing social requirements in current criteria?

Strongly agree

If you agree that the common framework maintains the existing social requirements in current criteria, please state why, providing evidence where appropriate.:

If you disagree that the common framework maintains the existing social requirements in current criteria, please explain why, providing evidence where appropriate?:

Social Criteria: Part 2

47 Should the common framework require forest managers to uphold the high-level principles running through the fundamental ILO Conventions?

Yes

If you think the common framework should require forest managers to uphold the high-level principles running through the fundamental ILO Conventions, please state why, providing evidence where appropriate.:

If you think the common framework should not require forest managers to uphold the high-level principles running through the fundamental ILO Conventions, please state why, providing evidence where appropriate.:

Social Criteria: Part 3

48 Do you agree that forest managers should be required to ensure the management and harvesting activities have a positive impact on local communities in the sourcing area?

Strongly agree

If you agree that forest managers should be required to ensure the management and harvesting activities have a positive impact on local communities in the sourcing area, please state why, providing evidence where appropriate:

But need to qualify/quantify how this can be measured.

If you agree that forest managers should be required to ensure the management and harvesting activities have a positive impact on local communities in the sourcing area, please state why, providing evidence where appropriate:

49 Are there any other social requirements that should be included in the common framework relating to the sourcing and harvesting of forest biomass? Please explain what these are, how these could be implemented, and the rationale for inclusion.

Are there any other social requirements that should be included in the common framework relating to the sourcing and harvesting of forest biomass? Please explain what these are, how these could be implemented, and the rationale for inclusion.:

Role of SDGs.

Forest Carbon Criteria: Part 1

50 Do you agree that requirements relating to productivity are sufficiently addressed in existing criteria?

Somewhat agree

If you agree that requirements relating to productivity are sufficiently addressed in existing criteria, please state why, providing evidence where appropriate.:

If you disagree that requirements relating to productivity are sufficiently addressed in existing criteria, please state why, providing evidence where appropriate.:

Forest Carbon Criteria: Part 2

51 Do you agree that the forest criteria should explicitly prevent forest derived biomass from being sourced from areas that would be permanently deforested?

Somewhat agree

If you agree that the forest criteria should explicitly prevent forest derived biomass from being sourced from areas that would be permanently deforested, please state why, providing evidence where appropriate.:

If you disagree that the forest criteria should explicitly prevent forest derived biomass from being sourced from areas that would be permanently deforested, please state why, providing evidence where appropriate.:

52 We propose that deforestation is defined as the conversion of a forest to non-forest land, in alignment with existing domestic definitions. Do you agree with this definition of deforestation?

Somewhat agree

If you disagree with the definition of deforestation given, please state why, and provide an alternative definition.:

Forest Carbon Criteria: Part 3

53 Do you agree there should be an explicit requirement for long term forest carbon stocks to be maintained?

Somewhat agree

If you agree that there should be an explicit requirement for long term forest carbon stocks to be maintained, please provide evidence to support your answer.:

Yes, but need to consider timelines which are dependant on tree type, climate etc.

If you disagree that there should be an explicit requirement for long term forest carbon stocks to be maintained, please provide evidence to support your answer.:

What timescale should this assessment consider? Please provide evidence to support your response.:

need to consider timelines which are dependant on tree type, climate etc.

54 How could the assessment area be defined and determined? When should non-harvestable forests be included/excluded from the area assessment?

How could the assessment area be defined and determined? When should non-harvestable forests be included/excluded from the area assessment?:

55 What additional guidance should there be regarding a short-term reduction in carbon stocks? This should include what reasons are acceptable for short-term reductions in forest carbon stocks, what evidence should be provided to demonstrate steps are being taken to restore forest carbon stocks and how often assessments should be revisited.

What additional guidance should there be regarding a short-term reduction in carbon stocks? This should include what reasons are acceptable for short-term reductions in forest carbon stocks, what evidence should be provided to demonstrate steps are being taken to restore forest carbon stocks and how often assessments should be revisited.:

Short-term reductions due to storms, fires, disease etc should be accounted for.

Forest Carbon Criteria: Part 4

56 Should government set requirements relating to management changes? How could these be monitored and what should these requirements cover? Please provide evidence, rationale and risks of this approach.

Should government set requirements relating to management changes? How could these be monitored and what should these requirements cover? Please provide evidence, rationale and risks of this approach.:

57 What data could government collect from sourcing regions to monitor management changes? How can government understand the extent to which bioenergy demand may be influencing management changes?

What data could government collect from sourcing regions to monitor management changes? How can government understand the extent to which bioenergy demand may be influencing management changes?:

Prohibited Land Categories

58 Do you agree that forest biomass should not be sourced from the prohibited land categories proposed?

Strongly agree

If you agree that forest biomass should not be sourced from the prohibited land categories proposed, please state why, providing evidence where appropriate:

If you disagree that forest biomass should not be sourced from the prohibited land categories proposed, please state why, providing evidence where appropriate:

59 Should material be allowed to be sourced from primary, old growth and highly biodiverse forest if it can be demonstrated that the area has been harvested to prevent disease, fire or pests, or that the production of the raw material did not interfere with nature protection purposes?

Yes

If you think material should be allowed to be sourced from primary, old growth and highly biodiverse forest if it can be demonstrated that the area has been harvested to prevent disease, fire or pests, or that the production of the raw material did not interfere with nature protection purposes, what evidence should be required to demonstrate compliance?:

High bar of evidence required to justify.

Roots Criterion

60 Do you agree that roots should be an ineligible feedstock?

Somewhat agree

If you agree that roots should be an ineligible feedstock, please provide evidence to support your response.:

If you disagree that roots should be an ineligible feedstock, please provide evidence to support your response.:

61 Should the sustainability criteria allow for certain circumstances where roots can be used for bioenergy?

Yes

If you think the sustainability criteria should allow for certain circumstances where roots can be used for bioenergy, please state what circumstances these might be and how they can be evidenced.:

Cascading Use Principal: Part 1

62 Do you agree with the proposed specification of sawlogs?

Strongly agree

If you do not agree with the proposed specification of sawlogs, how do you think they should be defined?:

63 Should sawlogs be prevented from use in bioenergy?

Yes

Should sawlogs be prevented from use in bioenergy? Please provide evidence to support your response.:

Other higher value uses.

64 If sawlogs are prevented from use in bioenergy, should a small margin of tolerance be introduced?

Yes

If you think a small margin of tolerance for the use of sawlogs in bioenergy should be introduced, please provide evidence to support your response:

If you think a small margin of tolerance for the use of sawlogs in bioenergy should not be introduced, please provide evidence to support your response:

Cascading Use Principal: Part 2

65 Beyond the included sawlog proposal, how could the cascading use principle be implemented in the common framework? Please provide details of the administrative burden across the supply chain and how this could be reduced.

Beyond the included sawlog proposal, how could the cascading use principle be implemented in the common framework? Please provide details of the administrative burden across the supply chain and how this could be reduced.:

Rather than introducing prescriptive controls or consignment-level restrictions, the cascading use principle should be integrated into the common framework through proportionate, risk-based due diligence and enhanced transparency. This would reinforce the principle without imposing unnecessary administrative complexity or distorting markets.

The cascading principle is most effectively delivered through targeted, evidence-based safeguards supported by transparency and lifecycle assessment, rather than through inflexible regulatory measures that would increase administrative burden across the supply chain without delivering meaningful additional environmental benefit.

66 Should the cascading use principle only apply to forest derived biomass, or all woody biomass?

Forest derived biomass

Please provide evidence to support your response on whether the cascading use principle should only apply to forest derived biomass, or all woody biomass.:

100% 'Sustainable Source'

67 Do you agree that, under the common framework, government should only provide support (where the forest criteria apply) to bioenergy from feedstocks that meet the forest criteria?

Somewhat agree

If you agree that, under the common framework, government should only provide support (where the forest criteria apply) to bioenergy from feedstocks that meet the forest criteria, please state why, providing evidence where appropriate:

If you disagree that, under the common framework, government should only provide support (where the forest criteria apply) to bioenergy from feedstocks that meet the forest criteria, please state why, providing evidence where appropriate:

68 Considering the forest criteria in the round, are there any other criteria that should be included to ensure forest biomass is low carbon?

Considering the forest criteria in the round, are there any other criteria that should be included to ensure forest biomass is low carbon?:

Feedstocks in Scope of Forest Criteria

69 Do you agree with the feedstocks that are in scope?

Somewhat agree

If you agree with the feedstocks that are in scope, please state why, providing evidence where appropriate.:

If you disagree with the feedstocks that are in scope, please explain which feedstocks should be in or out of scope of the forest criteria. Please provide evidence to support your response. :

70 What are the challenges with applying the forest carbon stocks criterion to secondary feedstocks (e.g. sawmill residues)? How could these be overcome?

What are the challenges with applying the forest carbon stocks criterion to secondary feedstocks (e.g. sawmill residues)? How could these be overcome?:

71 Are there challenges with applying the prohibited land categories to secondary feedstocks (such as sawmill residues)?

Yes

If there are challenges with applying the prohibited land categories to secondary feedstocks (such as sawmill residues), please identify challenges and suggest how these could be overcome (e.g. through the use of appropriate proxies).:

72 Do you have any additional views on secondary feedstocks (such as sawmill residues) that have not been captured by questions above? For example, the risks associated with misalignment with other international sustainability criteria (e.g. EU RED III).

Do you have any additional views on secondary feedstocks (such as sawmill residues) that have not been captured by questions above? For example, the risks associated with misalignment with other international sustainability criteria (e.g. EU RED III).:

73 Should Short Rotation Forestry (SRF) have to comply with the productivity criterion, forest carbon criterion or deforestation criterion?

Yes

If Short Rotation Forestry (SRF) should have to comply with the productivity criterion, forest carbon criterion or deforestation criterion, please state why, providing evidence where appropriate.:

If Short Rotation Forestry (SRF) should not have to comply with the productivity criterion, forest carbon criterion or deforestation criterion, what should the cut off age of the trees harvested be for the exemption? Please provide evidence to support your response. :

Evidence of Compliance With the Forest Criteria

74 Should the types of evidence for demonstrating compliance with forest criteria be kept aligned with existing criteria?

Yes

If the types of evidence for demonstrating compliance with forest criteria should be kept aligned with existing criteria, please state why, providing evidence where appropriate.:

If the types of evidence for demonstrating compliance with forest criteria should not be kept aligned with existing criteria, please outline what changes should be made.:

75 Please highlight any specific cost implications to your business/sector in meeting the proposed forest criteria. Please provide evidence to support your answer.

Please highlight any specific cost implications to your business/sector in meeting the proposed forest criteria. Please provide evidence to support your answer. :

76 What challenges (including costs) are faced by certification schemes updating their criteria to be compatible with the forest criteria proposals that go beyond existing requirements? Please highlight any challenges that may vary depending on biomass end use sector or application e.g. transport vs electricity.

What challenges are faced by certification schemes updating their criteria to be compatible with the forest criteria proposals that go beyond existing requirements? Please highlight any challenges that may vary depending on biomass end use sector or application e.g. transport vs electricity. :

Wastes and Residues

77 Do you agree that, unless otherwise stated, wastes and residues should be exempt from the land criteria?

Strongly agree

If you agree that, unless otherwise stated, wastes and residues should be exempt from the land criteria, please state why, providing evidence where appropriate.:

If you disagree that, unless otherwise stated, wastes and residues should be exempt from the land criteria, please state why, providing evidence where appropriate.:

78 Do you have evidence that wastes are being purposefully created to produce feedstocks for bioenergy?

No

If you have evidence that wastes are being purposefully created to produce feedstocks for bioenergy, please provide evidence.:

Novel Feedstocks

79 Are there any emerging or novel biomass feedstocks for which sustainability criteria may need to be developed?

Yes

If there are emerging or novel biomass feedstocks for which sustainability criteria may need to be developed, please specify the feedstocks and suggest criteria that would mitigate potential environmental harms arising from the sourcing of the feedstock.:

Marine based feedstocks.

Application of Land Criteria to non-Bioenergy Uses

80 How would the land criteria, as currently formulated, be applied to biomass feedstocks regardless of their end use (including non-energy uses)?

How would the land criteria, as currently formulated, be applied to biomass feedstocks regardless of their end use (including non-energy uses)?:

Same criteria could be used.

81 Would the land criteria need to be adapted to mitigate potential negative environmental impacts associated with non-energy uses of biomass?

Yes

If you think that the land criteria would need to be adapted to mitigate potential negative environmental impacts associated with non-energy uses of biomass, please provide evidence to support your response.:

Depends on the use of the biomass, and what the biomass feedstock is displacing. e.g. bio-based chemical v fossil based requires a full LCA to understand all benefits and impacts.

If you think that the land criteria would not need to be adapted to mitigate potential negative environmental impacts associated with non-energy uses of biomass, please provide evidence to support your response.:

82 If applied to non-energy uses, how could government ensure that the application of land criteria does not create unintended barriers for sustainable non-energy uses of biomass?

If applied to non-energy uses, how could we ensure that the application of land criteria does not create unintended barriers for sustainable non-energy uses of biomass? :

Through the selected use of exemptions and tailored MRV framework.

The framework is clearly designed around biomass for energy use, which makes sense given the policy drivers, but there's a risk that criteria optimised for energy biomass don't translate to other bio-based applications. If the principles start to influence wider markets, it'll be important that non-energy systems aren't inadvertently penalised.

For circular models that valorise existing industrial co-products, clarity on definitions and categorisation will really matter. There's a risk that genuinely circular feedstocks get assessed through a land-use or crop-based lens that doesn't reflect their actual impact.

While the document focuses on energy biomass, it's not hard to imagine elements being reused elsewhere. Some clarity on how (or if) the framework might extend beyond energy, and on what timescales, would be helpful for longer-term planning.

Application of (non-GHG) Environmental Protections to Wider Biomass Supply Chain

83 What environmental or social concerns are there regarding the wider biomass supply chain? Please be specific about their nature and the sectors that these concerns relate to.

What environmental or social concerns are there regarding the wider biomass supply chain? Please be specific about their nature and the sectors that these concerns relate to.:

Some stakeholders have raised concerns that reliance on local regulatory systems leaves gaps in protection, particularly in relation to non-GHG environmental and social impacts. These concerns have focused most prominently on air quality and potential respiratory health impacts on local communities near pellet mills, as well as broader questions about whether local regulations are sufficiently robust or consistently enforced.

Applying additional (non-GHG) environmental or social protections across the entire biomass supply chain presents several significant challenges:

- Enforcement and verification difficulties: Environmental impacts are often highly location-specific, and supply chains span multiple countries. Effective auditing of compliance and verification of alleged breaches would be complex and, in practice, would still rely heavily on local regulators and reporting systems.

- Disproportionate outcomes from regulatory breaches: Local regulatory regimes typically apply graduated sanctions depending on the severity of non-compliance. Translating these into sustainability criteria could result in a binary outcome—where any breach, regardless of seriousness, renders biomass unsustainable—potentially leading to disproportionate consequences.

- Attribution to specific consignments: Where breaches occur at a facility level, it may be impossible to identify which biomass consignments are affected. Enforcement actions may also take months to conclude, creating uncertainty and the risk of retrospective impacts on support payments or compliance status.

- Lack of monitoring and verification infrastructure: There is currently no established monitoring, reporting, and verification framework covering the wider biomass supply chain. Developing such a system would impose significant administrative and financial burdens on suppliers, users, auditors, and regulators, with costs likely passed through to consumers.

- Risk of adverse sourcing incentives: If compliance were based on local regulatory standards, UK suppliers could be incentivised to source biomass from regions with weaker environmental or social protections, potentially undermining overall environmental outcomes.

- Trade and supply chain impacts: Introducing additional requirements on established international supply chains could create new administrative barriers and disrupt trade with key partner countries, without clear evidence of proportional environmental benefit.

84 Should sector specific policy measures be put in place to mitigate potential risks relating to the wider supply chain or should these be set out at a cross-sector level under the common framework?

Set out at a cross-sector level

If sector specific policy measures should be put in place to mitigate potential risks relating to the wider supply chain or should these be set out at a cross-sector level under the common framework, please provide detailed evidence on what these could be and how they could be implemented, noting the challenges highlighted above.:

Chapter 4: Greenhouse Gas (GHG) Criteria

Common Parameters for Calculating GHG Lifecycle Emissions

85 Do you agree that the proposed lifecycle parameters can be used to give an appropriate representation of the bioenergy LCA emissions?

Somewhat agree

If you agree that the proposed lifecycle parameters can be used to give an appropriate representation of the bioenergy LCA emissions, please state why, providing evidence where appropriate.:

If you disagree that the proposed lifecycle parameters can be used to give an appropriate representation of the bioenergy LCA emissions, please state why, providing evidence where appropriate.:

86 Are there additional parameters that should be considered?

Are there additional parameters that should be considered? :

System Boundary Application

87 Do you agree with the approach on system boundary application?

Somewhat agree

If you agree with the approach on system boundary application, please provide evidence to support your response, including sector-specific impacts where possible.:

If you disagree with the approach on system boundary application, please provide evidence to support your response, including sector-specific impacts where possible.:

ILUC Emissions Within GHG Criteria

88 Do you agree that there should be a requirement for ILUC values to be reported separately for crop-based feedstocks by all future biomass policies?

Somewhat agree

If you agree that there should be a requirement for ILUC values to be reported separately for crop-based feedstocks by all future biomass policies? Please provide evidence to support your response.:

If you disagree that there should be a requirement for ILUC values to be reported separately for crop-based feedstocks by all future biomass policies? Please provide evidence to support your response.:

89 How could the GHG criteria lifecycle assessment be expanded to include accurate ILUC emissions in the future? Please provide evidence to support your response.

How could the GHG criteria lifecycle assessment be expanded to include accurate ILUC emissions in the future? Please provide evidence to support your response. :

90 To ensure consistency, and to minimise reporting costs, should those reporting on ILUC values, and incorporating them into GHG criteria life cycle assessments, be obliged to base such values on future government provided coefficients?

Yes

If you answered that those reporting on ILUC values, and incorporating them into GHG criteria life cycle assessments, should be obliged to base such values on future government provided coefficients, please state why, providing evidence where appropriate.:

Yes if developed with industry.

If you answered that those reporting on ILUC values, and incorporating them into GHG criteria life cycle assessments, should not be obliged to base such values on future government provided coefficients, please state why, providing evidence where appropriate.:

91 Are there other ways in which ILUC could be addressed within the common biomass sustainability framework? Please provide evidence to support your response.

Are there other ways in which ILUC could be addressed within the common biomass sustainability framework? Please provide evidence to support your response. :

Soil Carbon Accounting

92 What could be done to further improve data collection and monitoring of soil carbon accounting?

What could be done to further improve data collection and monitoring of soil carbon accounting?:

standardized measurement protocols

Default Values

93 What other considerations should be made when defining or updating default values in line with the common framework GHG life cycle parameters?

What other considerations should be made when defining or updating default values in line with the common framework GHG life cycle parameters?:

Approach to Setting GHG Savings Thresholds by Sector

94 Do you agree that thresholds under the GHG criteria should be set by individual biomass policies instead of a single cross-sector biomass supply chain threshold?

Strongly agree

If you agree that thresholds under the GHG criteria should be set by individual biomass policies instead of a single cross-sector biomass supply chain threshold, please provide evidence to support your response.:

If you disagree, please explain why, providing evidence where appropriate?:

95 Do you agree with the proposed considerations in determining appropriate thresholds and that these can achieve meaningful decarbonisation across different bioenergy sectors?

Somewhat agree

If you agree with the proposed considerations in determining appropriate thresholds and that these can achieve meaningful decarbonisation across different bioenergy sectors, please provide evidence to support your response.:

It is also important to account for the carbon intensity of the fossil resources displaced through biomass use, and the resulting abatement achieved. In particular, the recovery of waste wood for energy avoids disposal to landfill, thereby preventing methane emissions and delivering additional climate benefits. As carbon reduction targets continue to tighten, assessment of biomass should increasingly reflect the net carbon impact across the entire supply chain, including both avoided fossil emissions and avoided waste-related emissions.

If you disagree with the proposed considerations in determining appropriate thresholds and that these can achieve meaningful decarbonisation across different bioenergy sectors, please provide evidence to support your response.:

Are there other key considerations that should be factored in? Please provide evidence to support your response.:

96 Are there alternative ways to set a threshold for bioenergy pathways?

No

If there are alternative ways to set a threshold for bioenergy pathways, please explain how this could be achieved?:

Feedstocks in Scope of GHG Criteria

97 Do you agree with the proposed feedstocks in scope of the GHG criteria as shown in table 4.1?

Somewhat agree

If you agree with the proposed feedstocks in scope of the GHG criteria as shown in table 4.1, please provide evidence to support your response, including sector-specific impacts where possible.:

If you disagree with the proposed feedstocks in scope of the GHG criteria as shown in table 4.1, please provide evidence to support your response, including sector-specific impacts where possible.:

98 What are the barriers and challenges (if any) in accounting for GHG emissions from wastes, including mixed wastes?

What are the barriers and challenges (if any) in accounting for GHG emissions from wastes, including mixed wastes? :

Composition of waste.

Compliance With GHG Criteria

99 Should the methods for reporting greenhouse gas (GHG) emissions savings be kept in line with existing criteria?

Yes

If the methods for reporting greenhouse gas (GHG) emissions savings should not be kept in line with existing criteria, please outline what changes should be made.:

100 Please highlight any specific cost implications to your business/sector in meeting the proposed GHG criteria. Please provide evidence to support your response.

Please highlight any specific cost implications to your business/sector in meeting the proposed GHG criteria. Please provide evidence to support your response. :

Strengthening MRV is positive, but the reporting and verification burden needs to be proportionate, especially for SMEs. A tiered or risk-based approach would help ensure credibility without creating unnecessary barriers for lower-impact systems.

Application of GHG Criteria to Non-Bioenergy Uses

101 How can life cycle GHG emissions from non-energy uses of biomass best be calculated, taking account of methodological challenges?

How can life cycle GHG emissions from non-energy uses of biomass best be calculated, taking account of methodological challenges?:

Please see: <https://bb-reg-net.org.uk/wp-content/uploads/2025/12/BB-REG-NET-WHITE-PAPER.pdf>

Life Cycle Assessment (LCA) has repeatedly shown that bio-based chemicals and materials can offer significant environmental impact advantages over fossil equivalents, including reduced CO₂ emissions.

LCA plays a crucial role in comparing the environmental performance of different materials or technologies. However, for nascent sectors such as bio-based chemicals and materials, LCA can present significant challenges. Existing standards were often developed with mature, fossil-based systems in mind, resulting in frameworks that inadvertently disadvantage newer technologies and products.

These shortcomings include inconsistent treatment of biogenic carbon, limited recognition of novel end-of-life pathways such as composting, and rigid comparability criteria that fail to account for innovation-driven variability. As a result, LCA can sometimes misrepresent the true environmental potential of emerging solutions, impeding their development and acceptance in markets and policy.

Our BB-REG-NET report 'Standardised but Unfair', examined whether current standards enable fair comparison between fossil-based, and bio-based and biodegradable materials using LCA. The study assessed 8 ISO and 6 EN LCA standards against three critical issues, namely incomparability, implicit bias, and end-of-life treatment. Each standard was evaluated using a structured scoring system to determine whether it enabled fair comparison, disabled or discouraged fair comparison, or had no effect on fair comparison between fossil-based and bio-based and biodegradable materials using LCA.

The key issues this evaluation identified were:

- Biogenic carbon treatment: inconsistently or inaccurately handled across standards
- End-of-life classification: especially for materials destined for composting, often misrepresented or excluded
- Comparative consistency: the same rule applied differently between cases

Among the three issues, end-of-life treatment had the most significant negative impact on comparability, followed by implicit bias in methodology or rules, and incomparability between material types.

Across the standards assessed, most were either neutral or disabling of fair comparison; end-of-life treatment was the single largest barrier. The recently published BS EN 18027:2025 Bio-based Products – Life Cycle Assessment, by contrast, explicitly corrects these biases. For organic recycling, it allows composting and anaerobic digestion to be modelled as legitimate end-of-life routes and standardises treatment of biogenic carbon.

The forthcoming EU Bioeconomy Strategy offers an opportunity to support the universal adoption of BS EN 18027:2025 as a standard for comparative assessment using LCA. The strategy aims to propose a strategic framework for bioeconomy standards and metrology, within which the recommendation of BS EN 18027:2025 would promote fair comparison.

Our BB-REG-NET work on methodology guidelines for LCA found that most Impact Assessment Methods were developed during the era of fossil material incumbency, when products requiring assessment were more likely to be fossil-based than bio-based, and were more likely to be designed for linear economy disposal methods such as landfill, incineration or recycling than biodegradation. The impact categories used in common Impact Assessment Methods are therefore those which enable the assessment of these products and end-of-life treatment methods.

Impact categories which were not relevant or not advantageous to fossil materials are not included in these assessment methods. To enable LCA to be used to compare fossil-based materials and products to those which are biobased, biodegradable or both, additional impact categories are required to ensure comparison is undertaken in categories which reflect the advantages of both products. We propose seven impact categories which would enable this fair comparison, when used in addition to standard impact categories such as those in ReCiPe or Environmental Footprint methods.

Recommendation: Require Life Cycle Assessments used to compare bio-based and fossil-based chemicals and materials to be conducted to BS EN 18027:2025

Recommendation: Commission further research to advance LCA methodologies for the comparative assessment of fossil-based and bio-based or biodegradable materials. Encourage the integration of additional impact categories, e.g. Biodegradability, Bioaccumulation, Persistence, Microplastic formation, Biodiversity impact, Litter risk, and the inclusion of a specific biogenic carbon impact category.

102 At what points in the material life cycle is it most feasible to collect data on GHG emissions for non-fuel uses of biomass?

At what points in the material life cycle is it most feasible to collect data on GHG emissions for non-fuel uses of biomass? :

Collecting data on GHG emissions for non-fuel uses are most feasibly conducted at feedstock collection, primary processing, and product manufacture, as opposed to end-use periods which may vary by context.

103 What is your view on the preferred declared or functional unit of expression for LCAs for non-fuel uses of biomass, as an alternative to gCO₂e/MJ?

What is your view on the preferred declared or functional unit of expression for LCAs for non-fuel uses of biomass, as an alternative to gCO₂e/MJ?:

104 Do you believe that there exists a sufficient evidence base to set default values of biomass sustainability for non-energy uses?

Is there a sufficient evidence base to set default values of biomass sustainability for non-energy uses? :

No, there is not currently a sufficient evidence base to set default values.

Chapter 5: Monitoring, Reporting and Verification (MRV)

Harmonising Feedstock Definitions

105 Do you agree that biomass feedstock definitions need to be harmonised across end-use sectors?

Strongly agree

If biomass feedstock definitions should be harmonised, how broad or granular should these categories or definitions be? Please provide examples.:

If you disagree that biomass feedstock definitions should be harmonised, please provide evidence to support your response. :

106 Are there any other improvements to the feedstock type reporting process that should be considered?

Are there any other improvements to the feedstock type reporting process that should be considered?:

Mandating Reporting of Biomass Country of Origin

107 Do you agree that biomass feedstock country of origin reporting should be mandatory, with certain exemptions?

Strongly agree

If you agree that biomass feedstock country of origin reporting should be mandatory, with certain exemptions, please state why, providing evidence where appropriate.:

If you disagree that biomass feedstock country of origin reporting should be mandatory, with certain exemptions, please state why, providing evidence where appropriate.:

108 Please state which feedstocks should be exempt from country of origin reporting. Please provide evidence to support your response.

Please state which feedstocks should be exempt from country-of-origin reporting? Please provide evidence to support your response.:

No exemptions.

Reporting of Minimum Sustainability Metrics in Standardised Format

109 Do you agree there should be a list of minimum sustainability metrics that are collected and reported to the relevant delivery body?

Somewhat agree

If you agree, please explain your answer, including examples of sustainability metrics that could be included.:

If you disagree that there should be a list of minimum sustainability metrics that are collected and reported to the relevant delivery body, please state why, providing evidence where appropriate.:

110 How should a list of minimum sustainability metrics that are collected and reported to the relevant delivery body be achieved in practice?

How should a list of minimum sustainability metrics that are collected and reported to the relevant delivery body be achieved in practice?:

111 What potential barriers or challenges, including cost implications, need to be overcome to achieve standardisation of reporting?

What potential barriers or challenges, including cost implications, need to be overcome to achieve standardisation of reporting?:

Strengthening MRV is positive, but the reporting and verification burden needs to be proportionate, especially for SMEs - A tiered or risk-based approach would help ensure credibility without creating unnecessary barriers for lower-impact systems.

Improving Transparency of Sustainability Data

112 Do you agree with the proposal on publishing relevant sustainability data?

Strongly agree

If you agree with the proposal on publishing relevant sustainability data, please provide evidence to support your response.:

If you disagree with the proposal on publishing relevant sustainability data, please provide evidence to support your response.:

113 Which data points should be included to improve the transparency of sustainability practices across the biomass incentive schemes? Please provide evidence to support your response.

Which data points should be included to improve the transparency of sustainability practices across the biomass incentive schemes? Please provide evidence to support your response.:

114 Are there any data points that should not be included? Please provide evidence to support your response.

Are there any data points that should not be included? Please provide evidence to support your response. :

Improving and Harmonising Verification Processes

115 Overall, do you agree that there should be a risk assessed approach to carrying out third-party audits?

Strongly agree

If you agree that there should be a risk assessed approach to carrying out third-party audits, please state why, providing evidence where appropriate.:

If you disagree that there should be a risk assessed approach to carrying out third-party audits, please state why, providing evidence where appropriate.:

116 Do you agree the risk assessment should determine whether a 'reasonable' or 'limited' assurance audit needs to be carried out?

Somewhat agree

If you agree the risk assessment should determine whether a 'reasonable' or 'limited' assurance audit needs to be carried out, please state why, providing evidence where appropriate.:

If you disagree that the risk assessment should determine whether a 'reasonable' or 'limited' assurance audit needs to be carried out, please state why, providing evidence where appropriate.:

117 Do you agree the risk assessment should determine the frequency of auditing?

Somewhat agree

If you agree the risk assessment should determine the frequency of auditing, please state why, providing evidence where appropriate.:

If you disagree that the risk assessment should determine the frequency of auditing, please state why, providing evidence where appropriate.:

118 What are the differences in the financial and resourcing burden involved in carrying out 'reasonable' versus 'limited' assurance audits? Please provide evidence to support your response.

What are the differences in the financial and resourcing burden involved in carrying out 'reasonable' versus 'limited' assurance audits? Please provide evidence to support your response. :

119 What effect would the requirement of reasonable assurance have on government incentive scheme participants? Please provide evidence to support your response.

What effect would the requirement of reasonable assurance have on government incentive scheme participants? Please provide evidence to support your response.:

Benchmarking of Certification Schemes

120 Do you agree that benchmarking exercises for voluntary certification schemes should be at intervals no greater than five years?

Somewhat agree

If you agree that benchmarking exercises for voluntary certification schemes should be at intervals no greater than five years, please state why, providing evidence where appropriate.:

If you disagree that benchmarking exercises for voluntary certification schemes should be at intervals no greater than five years, please state why, providing evidence where appropriate.:

Introduce Additional Monitoring/Verification of Voluntary Certification Schemes in Benchmarking Process

121 Do you agree that VCSs should be required to disclose the following measures as part of the benchmarking process?

Strongly agree

Strongly agree

Somewhat agree

Somewhat agree

Please provide evidence to support your response:

122 Do you agree that operators should be required to provide a declaration that they are independent from the VCS, and to declare any actual or perceived conflicts of interest?

Strongly agree

If you agree that operators should be required to provide a declaration that they are independent from the VCS, and to declare any actual or perceived conflicts of interest, please state why, providing evidence where appropriate.:

If you disagree that operators should be required to provide a declaration that they are independent from the VCS, and to declare any actual or perceived conflicts of interest, please state why, providing evidence where appropriate.:

123 Do you agree that auditors carrying out ISAE3000 audits should rotate on a more frequent basis to provide more objective outputs and mitigate the risk of bias and conflicts of interest?

Somewhat agree

If you agree that auditors carrying out ISAE3000 audits should rotate on a more frequent basis to provide more objective outputs and mitigate the risk of bias and conflicts of interest, please state why, providing evidence where appropriate.:

If you disagree that auditors carrying out ISAE3000 audits should rotate on a more frequent basis to provide more objective outputs and mitigate the risk of bias and conflicts of interest, please state why, providing evidence where appropriate.:

Emerging MRV Practices: Supply Chain Site Visits and Inspections

124 What challenges and barriers to implementing supply chain visits and inspections are you aware of? For example, are there specific feasibility or cost concerns with overseas site visits?

What challenges and barriers to implementing supply chain visits and inspections are you aware of? For example, are there specific feasibility or cost concerns with overseas site visits?:

125 What benefits do you see this providing to the monitoring and assurance of biomass sustainability?

What benefits do you see this providing to the monitoring and assurance of biomass sustainability? :

Emerging MRV Practices: Powers to Request Data

126 Should incentive schemes have the ability to request data relating to biomass sustainability from any body involved in the certification, auditing and evidence generation process?

Yes

If you think that incentive schemes should have the ability to request data relating to biomass sustainability from any body involved in the certification, auditing and evidence generation process, please provide evidence to support your response. :

If you think that incentive schemes should not have the ability to request data relating to biomass sustainability from any body involved in the certification, auditing and evidence generation process, please provide evidence to support your response. :

127 Should incentive schemes have the ability to require participants to include data sharing provisions in contractual agreements with third parties?

Yes

If you think incentive schemes should have the ability to require participants to include data sharing provisions in contractual agreements with third parties, please provide evidence to support your response.:

If you think incentive schemes should not have the ability to require participants to include data sharing provisions in contractual agreements with third parties, please provide evidence to support your response.:

128 What barriers (including costs) are there to implementing data sharing as described?

What barriers are there to implement data sharing as described:

Emerging MRV Practices: Other

129 Do you have any additional views on current MRV practices that have not been captured by questions above?

Do you have any additional views on current MRV practices that have not been captured by questions above? :

130 Please provide any suggestions for strengthening MRV practices that are not outlined above, including as much detail as possible.

Please provide any suggestions for strengthening MRV practices that are not outlined above, including as much detail as possible.:

MRV: Enforcement Guiding Principles

131 Do you agree with the outlined enforcement guiding principles?

Strongly agree

If you agree with the outlined enforcement guiding principles, please state why, providing evidence where appropriate.:

If you disagree with the outlined enforcement guiding principles, please state why, providing evidence where appropriate.:

MRV: Passing on delivery body cost for enhanced scrutiny of non-compliant entities

132 What are your views on including a mechanism in future policy design to pass on costs of investigating non-compliant entities? Please provide evidence to support your response.

What are your views on including a mechanism in future policy design to pass on costs of investigating non-compliant entities? Please provide evidence to support your response.:

133 What is the appropriate forum for resolving disputes over the amount of costs charged to a non-compliant entity, for example a first-tier tribunal, or independent auditor?

What is the appropriate forum for resolving disputes over the amount of costs charged to a non-compliant entity, for example a first-tier tribunal, or independent auditor?:

Conclusion

134 Do you consider there to be any longer-term implications that have not already been addressed in this consultation, including costs to sectors, business, or consumers?

Do you consider there to be any longer-term implications that have not already been addressed in this consultation, including costs to sectors, business, or consumers?:

135 Do you have any further comments or suggestions across all policy proposals included in this consultation in relation to the objectives (set out above and in chapter 1), including on the costs and practicalities.

Do you have any further comments or suggestions across all policy proposals included in this consultation in relation to the objectives (set out above and in chapter 1), including on the costs and practicalities.: