



Organizan:



**Soluciones** con BIOMASA y GAS RENOVABLE  
ante el cambio de **MODELO ENERGÉTICO**  
**RETOS URGENTES** de la bioenergía en Iberoamérica

El reto de la Sostenibilidad en la Bioenergía

Con la colaboración de:



# The challenge of complying with REDII-sustainability requirements for heat and electricity from biomass

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SUSTAINABLE RESOURCES Verification Scheme – SURE



## RED defines sustainability criteria

DIRECTIVE (EU) 2018/2001 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 December 2018 on the promotion of the use of energy from renewable sources

- (1) Consensus of the EU member states on the sustainability of the energetic use of biomass
- (2) Proof is mandatory for companies that use funding instruments
- (3) To be implemented into national law by the member states by July 1, 2021 at the latest
- (4) From July 1, 2021 DIRECTIVE (EU) 2009/28 is no longer valid



## To (1): Sustainability as a process

- ✓ The introduction of sustainability criteria for electricity and heat from biomass in 2018 is preceded by a long and controversial process
  - ✓ December 11, 2018 Adoption of the REDII as a COMPROMISE of the EU member states on MINIMUM criteria
  - ✓ Regular review and adjustment provided for in revisions of the RED
  - ✓ Further / stricter criteria as well as extension of the scope with REDIII likely
- !! RED regulates more than just the sustainability of biomass**



## To (2): Who is required to provide evidence?

### REDII Art. 29 (1)

>> *Energy from (...) biomass fuels shall be taken into account for the purposes referred to in points (a), (b) and (c) of this subparagraph only if they fulfil the sustainability and the greenhouse gas emissions saving criteria (... laid down in paragraphs 2 to 7 and 10:*

- (a) contributing towards the Union target (...) and the RES shares of Member States;*
- (b) measuring compliance with renewable energy obligations (...);*
- (c) eligibility for financial support for the consumption of (...) biomass fuels.*

**!! Not SURE, but the legislator regulates who is required to provide proof!**



## To (3): Implementation in national law

On Art. 29 (1) letter a): If H&E from biomass is counted towards the EE portion of an MS, conformity with REDII must be proven

➔ *Not yet clear how monitored or implemented*

On Art. 29 (1) letter b): If H&E from biomass is offset against a quota or usage obligation

➔ *So far no initiative for implementation (in DE) recognizable*

On Art. 29 (1) letter c): If H&E receives feed-in tariffs from biomass or gains a financial advantage from other privileges (ETS, tax breaks?)

➔ *In DE: Only draft BioSt-NachV for electricity in the EEG in notification*

**!! When will all obligations to provide evidence be implemented in national law?**



## To (3): The European Emissions Trading Scheme ETS

Biomass with emission factor zero in the ETS from 2022 only with proof of sustainability

MRR Guidance document No. 3 (11/2017):

- ✓ Zero emissions from biomass in the ETS considered to be financial support, requiring REDII-certificate

Implementing Regulation (EU) 2020/2085 Art. 38 (5):

- ✓ Biomass fuels used for combustion must meet the sustainability criteria and the criteria for GHG savings according to Article 29 Paragraphs 2 to 7 and 10 of REDII
- ✓ If not compliant with Art. 38 (5), its carbon content is considered to be fossil carbon.
- ✓ Compliance in accordance with Article 30 and Article 31 Paragraph 1 of REDII



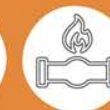
## To (4): Which voluntary schemes are available?

**REDII Art. 30:** Proof of conformity via voluntary certification schemes that have been recognized by the EU Commission through implementing acts.

**!! Delays in the approval process for REDII on the part of the EC have led to uncertainty in the market**

➔ **transitional regulation published on the [EC website](#)**

**EU Commission:** The Commission has made a preliminary positive assessment of the following VS: 2BSvs, Better Biomass, Bonsucro EU, ISCC EU, KZR INiG, REDcert, Red Tractor, RSB EU RED, RTRS EU RED, SQC, TASCC, UFAS and **SURE**.



## Who is required to provide evidence?

Article 29 (1): Systems that use biomass fuels for electricity and / or heat generation with an installed total rated thermal input of:

**20 MW** (solid biomass fuels)

**2 MW** (gaseous biomass fuels)

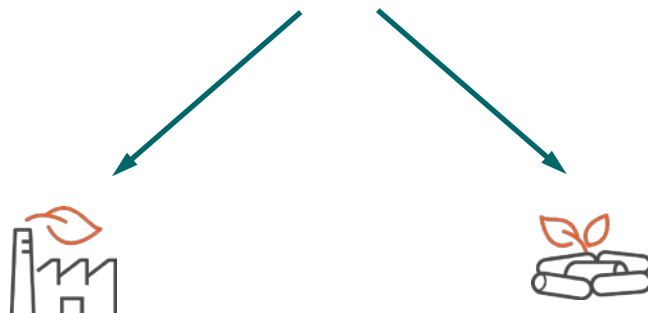
**!! Member states are authorized to define lower FWL for the area of application!**





## Who is required to provide evidence?

The obligation to provide evidence applies to companies ...



... who operate a biomass plant within  
the scope of national legislation

... produce or trade biomass or biomass  
fuels that are used in obliged plants



## Two strong partners join forces

**BiOenergy**  
EUROPE

**REDcert**  
Gesellschaft zur Zertifizierung  
nachhaltig erzeugter  
Biomasse mbH



**SURE** ✓  
SUSTAINABLE RESOURCES  
Verification Scheme GmbH



# Full scope certification

SURE defines criteria for the certification of



Forestry Biomass



Agricultural feedstock



Waste & Residues



Biomass plants



Biogas plants



Electricity



Heating & Cooling

Biokraftstoffe

**REDcert**  
Gesellschaft zur Zertifizierung nachhaltig erzeugter Biomasse (RED)



## First certificates issued according to REDII

On the basis of the transitional provisions of the EC, the first certificates for biomass plants were issued in July, and numerous other audits are in preparation:

- ✓ Mérida biomass power plant (ES)
- ✓ Pulp Mill Pontevedra (ES)

As of August 30th, 17 certification bodies and 50 auditors are approved in the SURE-EU system:  
<https://www.sure-system.org>



## REDII requirements

REDII – it's more than only sustainability criteria and GHG mitigation

- ✓ Sustainable biomass production (RED II Art. 29 (2-7))
- ✓ Minimum greenhouse gas savings (RED II Art. 29 (10))
- ✓ Traceability and mass balancing (REDII Art. 30 (1, 2))
- ✓ Plausibility checks (final energy generated vs. amount of substrate used)
- ✓ Issuance of sustainability certificates (e.g. in NABISY)



## Example: production of forest biomass

REDII allows two different ways to prove conformity:

	National Schemes	
	Recognized Voluntary Certification Schemes	
Art. 29 (6)	<b>A</b>	Sustainability criteria are secured by national laws
	<b>B</b>	If not or not completely, management systems have to be in place at sourcing area level
Art. 29 (7)	<b>A</b>	LULUCF criteria are met and implemented on national level. If not...
	<b>B</b>	...management systems have to be in place at forest sourcing area level to ensure that carbon stocks and sinks levels in the forest are maintained, or strengthened over the long term.





## RBA in the SURE system

To define a risk status, a risk assessment based on SURE's methodology can be used. SURE's risk assessments verify and evaluate whether the sustainability criteria for the production of forest biomass in the production area

- 1) are implemented by law, and
- 2) are enforced and adequately controlled/sanctioned, and
- 3) their effectiveness is ensured by verifiable indicators.

The sourcing areas are classified according to the results of the risk assessment:

- a) low-risk area
- b) specified-risk-area





## RBA in the SURE system

All biomass deliveries need to be covered by an active (signed) self-declaration stating compliance with RED II and SURE-requirements and handed-out to the group manager (usually: FGP):

- ✓ If biomass origins from a **low-risk area** according, the statements of the suppliers are **sample-checked** during the audit of the first gathering point
- ✓ If biomass origins from a **specified risk area/no RA available**, **all producers** from these sourcing areas are **checked** during the audit of the group manager (FGP)

!! **SURE Self-declarations are already available in Spanish and Portuguese**



## RBA in the SURE system

All biomass deliveries need to be covered by an active (signed) self-declaration stating compliance with RED II and SURE-requirements and handed-out to the group manager (usually: FGP):

- ✓ Checked suppliers do NOT receive a certificate, but an “inspection certificate” (on demand only)
- ✓ The inspection certificate must be linked to a valid certificate of the group manager
- ✓ The statement on sustainability is tied to the first gathering point to whom the biomass is delivered and the self-declaration is given
- ✓ The supplier may not declare biomass as sustainable to any third party



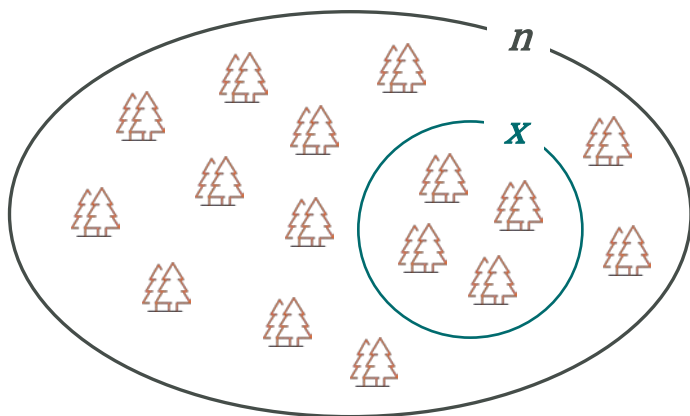
## Example: production of forest biomass – group certification

All biomass producers from specified risk regions are to be checked.

$$x = n$$

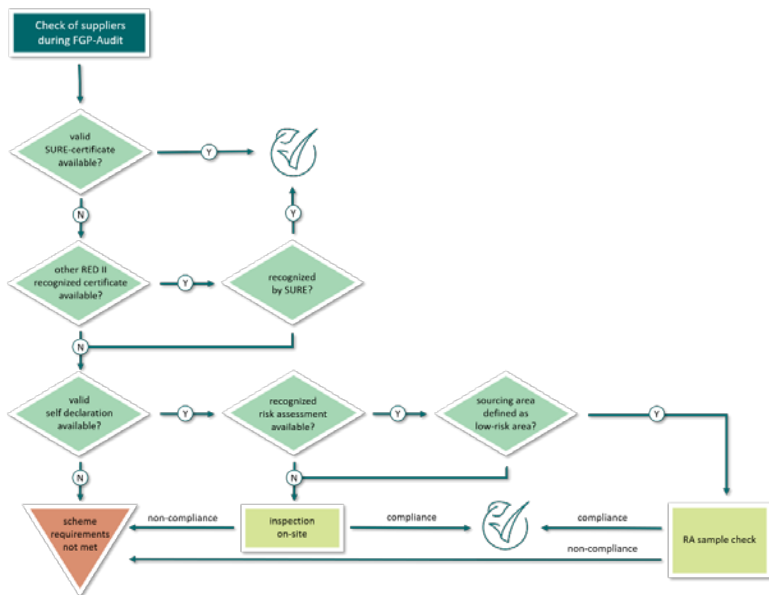
Sample check (x) out of basic population of LOW RISK forest biomass producers (n)

$$x = \sqrt{n}$$



- ✓ „Group manager“ (collecting point) needs to be certified
- ✓ Group n is considered certified, if the sample x is successfully inspected
- ✓ If missed (more than 1/3), sample is extended

## Means of verifying compliance – forest biomass





**B** CONGRESO INTERNACIONAL  
**BIOENERGÍA**

**2021**

VALLADOLID  
21, 22 Y 23  
SEPTIEMBRE



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**GRACIAS POR SU ATENCIÓN**



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