

Cefic policy proposals for biomass sustainability criteria supporting market pull measures

Executive Summary

Alongside energy efficiency, electrification, and circularity, the bioeconomy can be a central enabler of Europe's industrial transition toward climate neutrality. Establishing clear, consistent criteria for the sustainable sourcing and use of biomass is therefore essential to recognize the sustainability benefits associated with the transition to biobased resources for chemicals while managing potential environmental risks. While robust sustainability rules already exist for bioenergy and biofuels under Directive (EU) 2018/2001 (RED III), no comparable, harmonised framework applies to biomass used in chemicals, materials, and other non-energy applications. This potentially creates regulatory fragmentation, uncertainty for operators, and barriers to investment in Europe's emerging bioeconomy value chains.

This paper proposes an EU-wide sustainability framework for biomass used in products tied to market pull measures, such as a binding end-product-level biomass-derived¹ content mandate. The framework builds on 4 core pillars:

1. **Alignment with RED III sustainability criteria**, using Article 29(2–7) as a basis and adapting where needed to reflect the specificities of non-energy uses.
2. **Recognition of existing applicable and credible voluntary certification systems** already applied widely in agriculture and forestry, provided they uphold RED III principles and are verified by third-party, accredited, independent auditors against these principles.
3. **Robust climate safeguards**, via a lifecycle-based evaluation of greenhouse gas (GHG) emissions. An environmental impact evaluation of products is needed to enable fair comparison with fossil equivalents. Such a comparison should be executed using an internationally recognised method (e.g., ISO 14067:2018), or—where relevant—a robust regional methodology (e.g., the EU's PEF). Regardless, the methodology selected should follow the so-called “-1/+1 approach” and should ensure that there is no burden shifting, double counting, or over- or under-estimation of GHGs, thus enabling a transparent evaluation of the climate performance.
4. **Wide feedstock eligibility**: all feedstock types should remain eligible as long as they meet the biomass sourcing sustainability requirements of RED III Article 29(2-7), or comparable criteria in established certification schemes as set out in point 2.

¹ Biomass-derived products are products wholly or partly derived from biomass, encompassing bio-based and bio-attributed products.

Introduction

Europe's path toward climate neutrality requires a fundamental shift in how industrial sectors source and use raw materials, alongside continued technology advancement. Biomass—when sourced responsibly and transformed efficiently—offers a renewable option to conventional inputs for chemicals, materials, and other high-value products. Yet no harmonised sustainability framework exists for non-energy uses of biomass, creating uncertainty and hindering investment in emerging biomass-derived value chains.

To support the industrial transition towards net-zero while safeguarding environmental integrity and ensuring that biomass-derived value chains deliver genuine, measurable, and verifiable GHG emissions benefits, the EU needs a coherent approach that ensures biomass is sourced and used sustainably across all value chains. This paper outlines the rationale for such a framework for biomass used in products tied to market pull measures. It proposes a structure that builds on existing legislation (notably RED III) and recognises credible and applicable voluntary certification systems already widely applied in agriculture and forestry. It also highlights the importance of evaluating the lifecycle greenhouse gas (GHG) emissions performance of biomass-derived products and of keeping all biomass feedstock eligible for industrial use.

Rationale for an EU-wide framework

A harmonised EU framework for the use of biomass in products is essential to:

- **Provide regulatory clarity and consistency**, facilitating compliance and operational certainty.
- **Recognise the climate benefits** associated with the transition to biobased resources for chemicals while managing potential environmental risks.
- **Unlock opportunities for the industrial transition** by providing clear and realistic standards, considering their applicability to industrial manufacturing, and supporting the diversification of feedstock inputs.
- **Support the global competitiveness of European industries** by ensuring the consistent implementation of sustainability criteria for biomass use in products.

Proposal for a policy framework

The proposed framework covers the following key sustainability aspects:

- **Sourcing criteria.** I.e., cultivation of the feedstock – addressing issues such as land use change, biodiversity impact, and sustainable agricultural and forestry practices.
- **Climate performance.** GHG emissions of the product over its complete lifecycle – this is not strictly related only to biomass, but is an important aspect to show the environmental performance of biomass-derived products relative to alternatives.
- **Feedstock eligibility.** I.e., defining which types of biomass feedstock should be eligible for products tied to market pull measures.

For their operationalisation, we propose building on 4 pillars:

1. **Alignment with RED III sustainability criteria for products tied to a binding product-level mandate**, using Articles 29(2–7) as a basis and adapting where needed to reflect the specificities of non-energy uses.
2. **Recognition of existing credible and applicable voluntary certification systems** already applied widely in agriculture and forestry, provided they uphold RED III principles and are verified by third-party, accredited, independent auditors against these principles.

3. **Robust climate safeguards.** These should include a lifecycle-based assessment of GHG emissions to calculate the climate benefits delivered by biomass-derived products. To do so, a clear LCA methodology using a -1/+1 approach should be used, and should ensure that there is no burden shifting, double counting, or over/under estimating of GHG emissions, ensuring a transparent evaluation of the product's climate performance.
4. **Wide feedstock eligibility:** all biomass feedstock types should remain eligible as long as they meet sustainability requirements defined in points 1 and 2.

This framework should apply to products tied to market pull measures (e.g., biomass-derived content targets), and should ensure consistent application of the sustainability criteria for imports from non-EU countries.

The key sustainability aspects and their link with the policy framework are elaborated below.

1. Pillar 1 - Sourcing criteria

RED III Article 29(2–7) provides a sustainability baseline for biomass sourcing. This should serve as the common foundation for biomass used in chemicals and materials, in the context of binding product-level mandates in product policy, with targeted adaptations to reflect the differences between energy applications and products. Adaptations are suggested in Annex 1.

2. Pillar 2 - Recognition of existing credible voluntary certification systems

In many sectors, like forestry and agriculture, credible sustainability certification systems already exist². These should be recognised, if applicable, as evidence of compliance with RED III criteria, provided that:

- Their requirements uphold RED III principles. To this end, we recognize the practice used by existing certification systems (e.g., PEFC), in the case of forest-based feedstock, of assessing compliance through a risk-based assessment at the national or sub-national level;
- They include no contradictions with EU sustainability objectives.
- They are verified by third-party, accredited, independent auditors against RED III principles and EU sustainability objectives;

Furthermore, where Member States have already embedded RED-equivalent sustainability safeguards in national law, no additional demonstration should be required related to the sourcing of the biomass to be used within products. National certification schemes recognised for compliance with RED III should also be eligible for certification of sustainable biomass for biomass-derived content targets.

In the agricultural sector, where innovative agricultural practices can reduce GHG emissions and eventually contribute as a GHG emission sink (via "carbon farming"), CAP's Good Agricultural and Environmental Conditions (GAEC) requirements are already widely applied and provide a relevant and efficient reference point for defining sustainable biomass.

This approach leverages existing schemes and infrastructure rather than creating parallel requirements, thus avoiding duplication, supporting operators already applying high standards, allowing for the continued use and interoperability of existing best-practice systems, and accelerating implementation across value chains.

3. Pillar 3 - Climate performance (GHG assessment)

Ensuring environmental integrity requires a robust assessment of GHG performance across the full product lifecycle – such as an internationally recognised method (e.g., ISO 14067:2018) or—where relevant—a robust

² E.g., FSC, PEFC for forestry, RSPO for palm oil. A recent [Parliamentary study](#) lists existing certifications in the agricultural sector.

regional methodology (e.g., Commission Recommendation 2021/2279/EU³). While GHG methodologies for fuels rely on proving a reduction against a benchmark where the output (i.e., a fuel) and fate (i.e., combustion) are always the same, chemicals and materials present greater diversity in function and application, making it challenging to select a unique counterpart for comparison. GHG assessment methodologies must therefore be fit for purpose, transparent, science-based, and make sure that no burden shifting, double counting, over- or under-estimation takes place.

To this end, the [EU Taxonomy for the manufacturing of plastics in primary form](#), under the substantial contribution criteria for climate mitigation, already provides a workable approach to demonstrate that biomass-derived materials can have a lower CO₂ footprint than the fossil-based materials they intend to replace. The taxonomy principle can be adapted to biomass-derived products tied to product-level content mandates:

Lifecycle GHG emissions of products manufactured from sustainable bio-based feedstock should be demonstrated to be lower than the lifecycle GHG emissions of the equivalent products manufactured from fossil feedstock. Lifecycle GHG emissions are calculated using a recognised LCA methodology⁴. Quantified lifecycle GHG emissions are verified by an independent third party.

Nevertheless, current EU GHG accounting remains fragmented, with energy-focused rules under RED and product-level approaches such as EU-PEF for chemicals and materials applying different, and sometimes incompatible, methodological assumptions. This creates uncertainty for operators and makes it harder to demonstrate the environmental performance of biomass-derived products in a consistent way. A clear and harmonised LCA methodology is therefore needed to support fair comparison, avoid delays in the development and rollout of sustainable products, and ensure that GHG impacts and benefits are assessed credibly across value chains. Such a methodology should also correctly account for the uptake and release of biogenic carbon, in line with the so-called “-1/+1 approach”

4. Pillar 4 - Feedstock Eligibility

All biomass feedstock types should be eligible, provided they meet the criteria outlined at points 1 and 2. This ensures that environmental risks are addressed without imposing arbitrary restrictions, such as those currently foreseen within RED III. Such a cap for chemicals and materials would be counterproductive, hampering the transition of high-value industrial segments.

Studies⁵ show that:

- Food and feed crops do not increase food insecurity when used for non-food applications under sustainable cultivation conditions;
- Such crops have high land-use efficiency, producing multiple valuable co-products for food and feed markets, as also highlighted in the [EU Protein Action Plan](#);

³ PEF is an EU specific approach and is not harmonised with ISO, so other jurisdictions may apply different, ISO aligned methods.

⁴ In line with EU's PEF as described in Commission Recommendation 2021/2279/EU or ISO 14067:2018.

⁵ See, among others Dammer, L., Carus, M., Porc, O. 2023: *The Use of Food and Feed Crops for Bio-based Materials and the Related Effects on Food Security*. Renewable Carbon Initiative (ed.), Hürth 2023; (Dammer et al. 2023)

- The biggest contributor to food insecurity is food waste. The magnitude of the issue is regularly reported by FAO and UNEP⁶.

For more information please contact:

Marco Pellegrini - Bioeconomy Manager

mpe@cefic.be

About Cefic

Cefic, the European Chemical Industry Council, is the forum of large, medium and small chemical companies across Europe, accounting for 1.2 million jobs and 13% of world chemicals production.

⁶ In 2022, the world wasted 1.05 billion tonnes of food. This amounts to one-fifth (19%) of food available to consumers being wasted, at the retail, food service, and household levels. That is in addition to the 13% of the world's food lost in the supply chain, from post-harvest up to and excluding retail. Food loss and waste generate 8-10 per cent of global GHG emissions – almost five times the total emissions from the aviation sector.

Annex 1 – Modifications using RED III Art 29 (2-7) as basis

Paragraph	RED III Article 29 (2-7)	Modifications to cover biomass-derived products
2	Biofuels, bioliquids and biomass fuels produced from waste and residues derived not from forestry but from agricultural land shall be taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 only where operators or national authorities have monitoring or management plans in place in order to address the impacts on soil quality and soil carbon. Information about how those impacts are monitored and managed shall be reported pursuant to Article 30(3).	Biofuels, bioliquids and biomass fuels Biomass-derived products produced from waste and residues derived not from forestry but from agricultural land shall be taken into account for the contribution towards biomass-derived content targets defined in [regulation xxx] purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 only where operators or national authorities have monitoring or management plans in place in order to address the impacts on soil quality and soil carbon. Information about how those impacts are monitored and managed shall be reported pursuant to Article 30(3).
	The purposes referred to in points (a), (b), and (c) of the first subparagraph of paragraph 1 are specific to renewable energy, and hence not suitable for covering biomass-derived products. The points are specifically referring to: a) the contribution towards the renewable energy shares of Member States and the related targets b) the measurement of compliance with renewable energy obligations c) the eligibility for financial support for the consumption of biofuels, bioliquids, and biomass And are thus not applicable to biomass-derived products. Article 30(3) refers to the measures that Member States shall take to ensure that economic operators submit reliable information regarding compliance with the sustainability and GHG emission saving criteria defined within RED III. This requirement needs to be adapted to the regulatory framework that will cover biomass-derived products.	

3	Biofuels, bioliquids and biomass fuels produced from agricultural biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, irrespective of whether the land continues to have that status: (a) primary forest and other wooded land, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located; (b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes; (c) areas designated: (i) by law or by the relevant competent authority for nature protection purposes, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes; or (ii) for the protection of rare, threatened or endangered ecosystems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union	Biofuels, bioliquids and biomass fuels Biomass-derived products produced from agricultural biomass taken into account for the contribution towards biomass-derived content targets defined in [regulation xxx] purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, irrespective of whether the land continues to have that status: (a) primary forest and other wooded land, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located; (b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes; (c) areas designated: (i) by law or by the relevant competent authority for nature protection purposes, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes; or (ii) for the protection of rare, threatened or endangered ecosystems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature. , subject to their recognition in accordance with Article 30(4), first subparagraph, unless evidence is provided that the
---	--	---

	for the Conservation of Nature, subject to their recognition in accordance with Article 30(4), first subparagraph, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes; (d) highly biodiverse grassland spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland; or (e) heathland. Where the conditions set out in paragraph 6, points (a)(vi) and (vii), are not met, the first subparagraph of this paragraph, with the exception of point (c), also applies to biofuels, bioliquids and biomass fuels produced from forest biomass. The Commission may adopt implementing acts further specifying the criteria by which to determine which grassland is to be covered by the first subparagraph, point (d), of this paragraph. Those implementing acts shall be adopted in	production of that raw material did not interfere with those nature protection purposes. (d) highly biodiverse grassland spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland; or (e) heathland. Where the conditions set out in paragraph 6, points (a)(vi) and (vii), are not met, the first subparagraph of this paragraph, with the exception of point (c), also applies to biofuels, bioliquids and biomass fuels Biomass-derived products produced from forest biomass. The Commission may adopt implementing acts further specifying the criteria by which to determine which grassland is to be covered by the first subparagraph, point (d), of this paragraph. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 34(3).
--	--	---

	accordance with the examination procedure referred to in Article 34(3).	
	The purposes referred to in points (a), (b), and (c) of the first subparagraph of paragraph 1 are specific to renewable energy, and hence not suitable for covering biomass-derived products. The points are specifically referring to: a) the contribution towards the renewable energy shares of Member States and the related targets b) the measurement of compliance with renewable energy obligations c) the eligibility for financial support for the consumption of biofuels, bioliquids, and biomass And are thus not applicable to biomass-derived products. Article 34 and its sub-paragraphs refer to the Committee procedure, the assistance provided to the Commission by the Energy Union and the Sustainability of Biofuels, Bioliquids, and Biomass fuels committees, and the adoption of draft implementing acts. As these are energy focused committees, the reference is not applicable to biomass-derived products.	
4	Biofuels, bioliquids and biomass fuels produced from agricultural biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year; (b) continuously forested areas, namely land spanning more than one hectare with trees higher than five metres and a	Biofuels, bioliquids and biomass fuels Biomass-derived products produced from agricultural biomass taken into account for the contribution towards biomass-derived content targets defined in [regulation xxx] purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year; (b) continuously forested areas, namely land spanning more than one hectare with trees higher than five metres and a canopy cover of more than 30 %, or trees able to reach those thresholds <i>in situ</i>;

	canopy cover of more than 30 %, or trees able to reach those thresholds <i>in situ</i>; (c) land spanning more than one hectare with trees higher than five metres and a canopy cover of between 10 % and 30 %, or trees able to reach those thresholds <i>in situ</i>, unless evidence is provided that the carbon stock of the area before and after conversion is such that, when the methodology laid down in Part C of Annex V is applied, the conditions laid down in paragraph 10 of this Article would be fulfilled. This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008. Where the conditions set out in paragraph 6, points (a)(vi) and (vii), are not met, the first subparagraph of this paragraph, with the exception of points (b) and (c), and the second subparagraph of this paragraph also apply to biofuels, bioliquids and biomass fuels produced from forest biomass.	(c) land spanning more than one hectare with trees higher than five metres and a canopy cover of between 10 % and 30 %, or trees able to reach those thresholds <i>in situ</i>, unless evidence is provided that the carbon stock of the area before and after conversion is such that, when the methodology laid down in Part C of Annex V is applied, the conditions laid down in paragraph 10 of this Article would be fulfilled. This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008. Where the conditions set out in paragraph 6, points (a)(vi) and (vii), are not met, the first subparagraph of this paragraph, with the exception of points (b) and (c), and the second subparagraph of this paragraph also apply to biomass-derived products biofuels, bioliquids and biomass fuels produced from forest biomass.
	The purposes referred to in points (a), (b), and (c) of the first subparagraph of paragraph 1 are specific to renewable energy, and hence not suitable for covering biomass-derived products. The points are specifically referring to: a) the contribution towards the renewable energy shares of Member States and the related targets b) the measurement of compliance with renewable energy obligations c) the eligibility for financial support for the consumption of biofuels, bioliquids, and biomass And are thus not applicable to biomass-derived products.	
5	Biofuels, bioliquids and biomass fuels produced from agricultural biomass taken into account for the purposes	Biofuels, bioliquids and biomass fuels Biomass-derived products produced from agricultural biomass taken into account for the contribution towards

	referred to in paragraph 1, first subparagraph, points (a), (b) and (c), shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. Where the conditions set out in paragraph 6, points (a)(vi) and (vii), are not met, this paragraph also applies to biofuels, bioliquids and biomass fuels produced from forest biomass.	biomass-derived content targets defined in [regulation xxx] purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 , shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. Where the conditions set out in paragraph 6, points (a)(vi) and (vii), are not met, this paragraph also applies to biomass-derived products biofuels, bioliquids and biomass fuels produced from forest biomass.
	The purposes referred to in points (a), (b), and (c) of the first subparagraph of paragraph 1 are specific to renewable energy, and hence not suitable for covering biomass-derived products. The points are specifically referring to: a) the contribution towards the renewable energy shares of Member States and the related targets b) the measurement of compliance with renewable energy obligations c) the eligibility for financial support for the consumption of biofuels, bioliquids, and biomass And are thus not applicable to biomass-derived products.	
6	Biofuels, bioliquids and biomass fuels produced from forest biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 shall meet the following criteria to minimise the risk of using forest biomass derived from unsustainable production: (a) the country in which forest biomass was harvested has national or sub-national laws applicable in the area of harvest as well as monitoring and enforcement systems in place ensuring: (i) the legality of harvesting operations;	Biofuels, bioliquids and biomass fuels Biomass-derived products produced from forest biomass taken into account for the contribution towards biomass-derived content targets defined in [regulation xxx] purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 shall meet the following criteria to minimise the risk of using forest biomass derived from unsustainable production: (a) the country in which forest biomass was harvested has national or sub-national laws applicable in the area of harvest as well as monitoring and enforcement systems in place ensuring: (i) the legality of harvesting operations;

	(ii) forest regeneration of harvested areas; (iii) that areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grassland, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction; (iv) that harvesting is carried out considering maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats; (v) that harvesting maintains or improves the long-term production capacity of the forest; (vi) that forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in paragraph 3, points (a), (b), (d) and (e), paragraph 4, point (a), and paragraph 5, respectively under the same conditions of	(ii) forest regeneration of harvested areas; (iii) that areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grassland, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction; (iv) that harvesting is carried out considering maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats; (v) that harvesting maintains or improves the long-term production capacity of the forest; (vi) that forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in paragraph 3, points (a), (b), (d) and (e), paragraph 4, point (a), and paragraph 5, respectively under the same conditions of determination of the status of land specified in those paragraphs; and (vii) that installations producing biomass-derived products biofuels, bioliquids and biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the
--	--	--

determination of the status of land specified in those paragraphs; and (vii) that installations producing biofuels, bioliquids and biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi) of this subparagraph. (b) when evidence referred to in point (a) of this paragraph is not available, the biofuels, bioliquids and biomass fuels produced from forest biomass shall be taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 if management systems are in place at forest sourcing area level ensuring: (i) the legality of harvesting operations; (ii) forest regeneration of harvested areas; (iii) that areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grassland, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes; (iv) that harvesting is carried out considering maintenance of soil quality and biodiversity, in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth	purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi) of this subparagraph. (b) when evidence referred to in point (a) of this paragraph is not available, the biomass-derived products biofuels, bioliquids and biomass fuels produced from forest biomass shall be taken into account for the contribution towards biomass-derived content targets defined in [regulation xxx] purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 if management systems are in place at forest sourcing area level ensuring: (i) the legality of harvesting operations; (ii) forest regeneration of harvested areas; (iii) that areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grassland, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes; (iv) that harvesting is carried out considering maintenance of soil quality and biodiversity, in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with
--	---

	forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats; and (v) that harvesting maintains or improves the long-term production capacity of the forest.	requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats; and (v) that harvesting maintains or improves the long-term production capacity of the forest.
	The purposes referred to in points (a), (b), and (c) of the first subparagraph of paragraph 1 are specific to renewable energy, and hence not suitable for covering biomass-derived products. The points are specifically referring to: a) the contribution towards the renewable energy shares of Member States and the related targets b) the measurement of compliance with renewable energy obligations c) the eligibility for financial support for the consumption of biofuels, bioliquids, and biomass And are thus not applicable to biomass-derived products. Article 30(3), referring to the arrangement of an adequate standard of independent auditing of the information submitted regarding compliance with the sustainability and GHG emissions saving criteria, should be reviewed and adapted to the specific biomass-derived product framework. It is thus not applicable as such.	
7	Biofuels, bioliquids and biomass fuels produced from forest biomass taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1	Biofuels, bioliquids and biomass fuels Biomass-derived products produced from forest biomass taken into account for the contribution towards biomass-derived content targets defined in [regulation xxx] purposes

shall meet the following land-use, land-use change and forestry (LULUCF) criteria: (a) the country or regional economic integration organisation of origin of the forest biomass is a Party to the Paris Agreement and: (i) it has submitted a nationally determined contribution (NDC) to the United Nations Framework Convention on Climate Change (UNFCCC), covering emissions and removals from agriculture, forestry and land use which ensures that changes in carbon stock associated with biomass harvest are accounted towards the country's commitment to reduce or limit greenhouse gas emissions as specified in the NDC; or (ii) it has national or sub-national laws in place, in accordance with Article 5 of the Paris Agreement, applicable in the area of harvest, to conserve and enhance carbon stocks and sinks, and provides evidence that reported LULUCF-sector emissions do not exceed removals; (b) where evidence referred to in point (a) of this paragraph is not available, the biofuels, bioliquids and biomass fuels produced from forest biomass shall be taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 if management systems are in place at forest sourcing area level to ensure that carbon stocks and sinks levels in the forest are maintained, or strengthened over the long term. 7a. The production of biofuels, bioliquids and biomass fuels from domestic forest biomass shall be consistent with Member States' commitments and targets laid down in	referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 shall meet the following land-use, land-use change and forestry (LULUCF) criteria: (a) the country or regional economic integration organisation of origin of the forest biomass is a Party to the Paris Agreement and: (i) it has submitted a nationally determined contribution (NDC) to the United Nations Framework Convention on Climate Change (UNFCCC), covering emissions and removals from agriculture, forestry and land use which ensures that changes in carbon stock associated with biomass harvest are accounted towards the country's commitment to reduce or limit greenhouse gas emissions as specified in the NDC; or (ii) it has national or sub-national laws in place, in accordance with Article 5 of the Paris Agreement, applicable in the area of harvest, to conserve and enhance carbon stocks and sinks, and provides evidence that reported LULUCF-sector emissions do not exceed removals; (b) where evidence referred to in point (a) of this paragraph is not available, the biomass-derived products biofuels, bioliquids and biomass fuels produced from forest biomass shall be taken into account for the contribution towards biomass-derived content targets defined in [regulation xxx] purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 if management systems are in place at forest sourcing area level to ensure that carbon stocks and sinks levels in the forest are maintained, or strengthened over the long term. 7a. The production of biofuels, bioliquids and biomass fuels from domestic forest biomass shall be consistent with Member States' commitments and targets laid down in Article 4 of Regulation (EU) 2018/841 of the European Parliament and of the Council and with the policies and measures described
--	---

	Article 4 of Regulation (EU) 2018/841 of the European Parliament and of the Council (1) and with the policies and measures described by the Member States in their integrated national energy and climate plans submitted pursuant to Articles 3 and 14 of Regulation (EU) 2018/1999. 7b. As part of their final updated integrated national energy and climate plan to be submitted by 30 June 2024 pursuant to Article 14(2) of Regulation (EU) 2018/1999, Member States shall include all of the following: (a) an assessment of the domestic supply of forest biomass available for energy purposes in 2021-2030 in accordance with the criteria laid down in this Article; (b) an assessment of the compatibility of the projected use of forest biomass for the production of energy with the Member States' targets and budgets for 2026 to 2030 laid down in Article 4 of Regulation (EU) 2018/841; and (c) a description of the national measures and policies ensuring compatibility with those targets and budgets. Member States shall report to the Commission on the measures and policies referred in the first subparagraph, point (c), of this paragraph as part of their integrated national energy and climate progress reports submitted pursuant to Article 17 of Regulation (EU) 2018/1999.	by the Member States in their integrated national energy and climate plans submitted pursuant to Articles 3 and 14 of Regulation (EU) 2018/1999. 7b. As part of their final updated integrated national energy and climate plan to be submitted by 30 June 2024 pursuant to Article 14(2) of Regulation (EU) 2018/1999, Member States shall include all of the following: (a) an assessment of the domestic supply of forest biomass available for energy purposes in 2021-2030 in accordance with the criteria laid down in this Article; (b) an assessment of the compatibility of the projected use of forest biomass for the production of energy with the Member States' targets and budgets for 2026 to 2030 laid down in Article 4 of Regulation (EU) 2018/841; and (c) a description of the national measures and policies ensuring compatibility with those targets and budgets. Member States shall report to the Commission on the measures and policies referred in the first subparagraph, point (c), of this paragraph as part of their integrated national energy and climate progress reports submitted pursuant to Article 17 of Regulation (EU) 2018/1999.
	The purposes referred to in points (a), (b), and (c) of the first subparagraph of paragraph 1 are specific to renewable energy, and hence not suitable for covering biomass-derived products. The points are specifically referring to:	

	a) the contribution towards the renewable energy shares of Member States and the related targets b) the measurement of compliance with renewable energy obligations c) the eligibility for financial support for the consumption of biofuels, bioliquids, and biomass And are thus not applicable to biomass-derived products. Paragraph 7a points to Article 4 LULUCF and the necessity for Member States to ensure that emissions do not exceed removals. While carbon harvest should be counted regardless of its fate, no systematic accounting of storage or delayed emissions (except for harvested wood products) exists for products, unlike for energy, where carbon combustion is zero-rated. Without a coherent way to account for emissions related to biomass-derived products, this reference should be deleted. Paragraph 7b points to Member States' national energy and climate plans, which are focused on energy aspects. Paragraph 7b should be adapted to reflect the use of biomass in products instead of energy and to reflect the eventual policies in place introducing biomass-derived content mandates in products.
--	--