

Public report  
on the assessment of

certification scheme ATFS  
(request for advice from October 2017)

against the Dutch legal sustainability criteria  
for solid biomass for energy applications

by the

Advisory Commission on Sustainability  
of Biomass for Energy Applications

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## 1 Introduction

### 1.1 Dutch sustainability criteria for solid biomass for energy applications

In September 2013 more than 40 Dutch government bodies, companies and non-governmental organisations endorsed the National Energy Agreement for Sustainable Growth. Part of this Agreement deals with targets for the more sustainable use of energy in the years 2020 and 2023. Bio-energy plays an important role in meeting these targets. It was also agreed that sustainability criteria would be formulated for the large-scale application of biomass for cofiring in coal-fired power plants, and that these sustainability criteria would include forest management and climate aspects like greenhouse gas emissions, carbon debt and indirect land use change.

A working group with representatives from energy companies, environmental organisations and the government has further developed the sustainability criteria into principles and underlying criteria. As from 2015 these principles and criteria have been included as a condition in the subsidy regulation SDE+ for cofiring and for production of industrial steam from wood pellets, and from beginning 2018 these principles and criteria are laid down in environmental legislation. In order to demonstrate compliance with these principles and criteria, companies need to demonstrate that the biomass used fully meets the legal requirements. This can be achieved by certification schemes and/or a verification protocol approved for this purpose by the Dutch minister of Economic Affairs and Climate Policy (minister of EZK).

### 1.2 The advisory commission sustainability biomass for energy applications

The independent advisory commission sustainability of biomass for energy applications (further in this document “commission” or “advisory commission” or “ADBE”) is installed by the Dutch government. The commission advises the minister of EZK on the extent to which certification schemes comply with the sustainability criteria in the Dutch legal ‘*regeling conformiteitsbeoordeling vaste biomassa voor energietoepassingen*’. The commission only gives advice on request of the minister, who receives applications for approval of certification schemes and has to decide on the approval. The minister of EZK will approve certification schemes per individual sustainability criterion, and will only approve schemes which address all management criteria. The use of a certification scheme leads to one or several claims (for instance the claim “ATFS certified biomass”). The ADBE will advise for each claim which sustainability criteria are covered by the claim.

Energy companies can use the approved certification schemes and their claims to demonstrate that the solid biomass which they use complies with the Dutch legal sustainability criteria, either as “sustainable biomass” or as “controlled biomass”. Demonstrating this compliance is a condition for receiving subsidy from the so-called [SDE+ subsidy scheme](#) for cofiring of solid biomass in coal-fired power stations or for the large-scale production of industrial steam from solid biomass. Certification schemes might not be approved for all sustainability criteria. In this case a combination of two or more certification schemes and/or a combination of certification and verification might be required to show compliance with all Dutch legal sustainability criteria.

### 1.3 Readers guide

In chapter 2 of this report the assessment procedure of the advisory commission plus the application by ATFS and the timeline of the assessment are briefly explained. Chapter 3 gives a summary of the findings from the assessment by the commission for the certification scheme ATFS. In chapter 4, details on the commission’s judgement are given, and chapter 5 lists the documents that were used when performing this assessment. This report comes with two annexes: the first annex gives background information on the requirements for biomass categories and the Chain-of-Custody (CoC) system from Dutch legislation, and the second annex lists the abbreviations that are used throughout this report.

## 2 The commissions' assessment procedure and assessment of ATFS

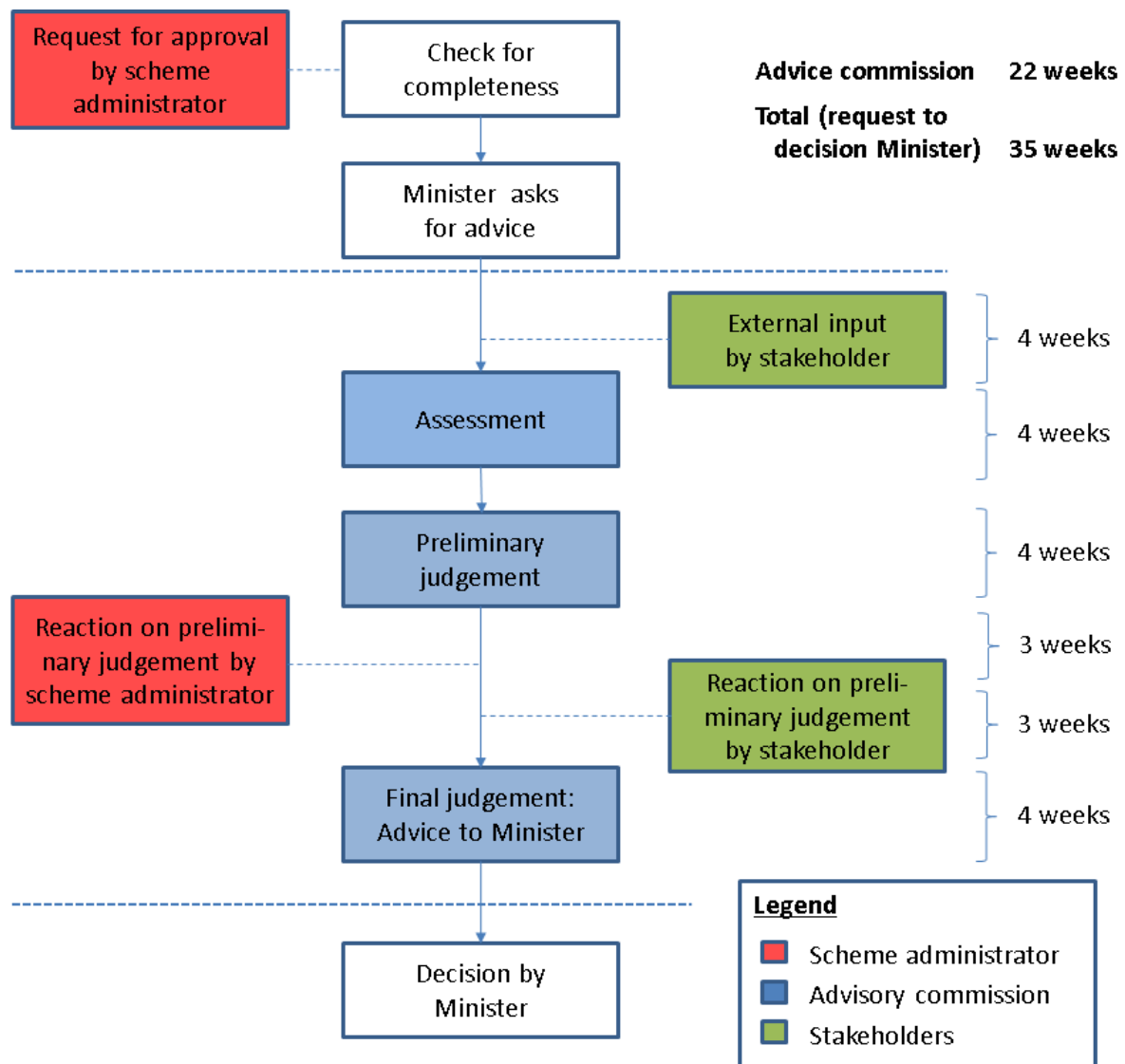
### 2.1 Assessment protocol

The assessment procedure of the advisory commission is described in a document called "toetsingsprotocol" (assessment protocol). The actual version of this protocol can be found on the [website of the advisory commission](#). The assessment protocol is available in Dutch language only. An English summary of the assessment procedure can be found on [this webpage](#).

The certification scheme "American Tree Farm System" (ATFS) is assessed using version 2.0 of the assessment protocol.

### 2.2 Summary of the assessment procedure

Schematically the procedure is visualised in the figure below.



## 2.3 Application by ATFS

The ATFS scheme manager made an application to the Dutch ministry of EZK in which approval of ATFS is requested for:

- the Dutch sustainability criteria under Principles P1 and P3-P11;
- biomass categories 1 and 2; and
- geographical coverage “USA”.

The following scheme documents were used for the assessment of the application:

- American Forest Foundation (AFF) 2015-2020 Standards of Sustainability
- American Tree Farm System® Independently Managed Group (IMG) Certification Standards 2015-2020
- ATFS Management Plan Addendum for the 2015-2020 Standards of Sustainability
- American Forest Foundation Standard Setting Procedures, approved July 2006 by AFF Board of Directors, amended January 2007 with Board approved definition of consensus
- ATFS Eligibility Requirements and Guidance, enacted January 1, 2015
- American Forest Foundation Disputes and Appeals Procedures, AFF Board approved November 9, 2011

The ATFS certification scheme is endorsed by PEFC International. This PEFC endorsement does not have any effect on the assessment by the commission of ATFS.

## 2.4 Timeline of the ATFS assessment

The commission received a request for advice on the ATFS application on October 24, 2017. The commission completed its preliminary judgement in January 2018. This preliminary judgement was sent for comments to the scheme manager (end of January) and to the stakeholders that provided external input for comments (end of February). In April 2018 the commission came to its final judgement, which is described in this report plus in the stakeholder report (see next paragraph). The advice that the commission has sent on June 8, 2018 to the minister of EZK consists of a cover letter plus these two reports.

## 2.5 External input

Stakeholders have been given the opportunity to submit external input to the commission during the first four weeks of the procedure (see also paragraph 2.2). This input plus a response by the commission formed the input for a separate stakeholder report. For the certification scheme ATFS, external input from three (groups of) stakeholders was received.

### 3 Summary of findings on certification scheme ATFS

A summary of the commission's findings on the application for approval by the certification scheme ATFS is given in the four paragraphs of this chapter 3. Further details on the commission's findings are given in chapter 4 "Assessment tables for certification scheme ATFS". The sustainability and management criteria referred to by the numbers in this chapter and listed in chapter 4 are copied from the Dutch regulation (the *regeling conformiteitsbeoordeling vaste biomassa voor energietoepassingen*), effective as from 1 January 2018.

The commission's judgement, based on the combined findings as described below, is that ATFS can be approved for the sustainability criteria 6.1, 6.2, 6.3, 7.5, 8.1, 8.2, 8.4, 8.5, 8.6, 8.8, 9.2, 10.1, 10.3, 11.1 and 11.2 for biomass categories 1 and 2. ATFS partly addresses sustainability criteria 8.7 and 10.2, the table in paragraph 4.2 shows which part of this criterion is addressed by ATFS.

#### 3.1 Findings on classification of biomass and on the first link in CoC to be certified

ATFS only certifies wood from forest land (biomass category 1 and 2). The commission has concluded that ATFS can distinguish between category 1 and 2 biomass through information on the property size as recorded in the ATFS database. Hence the commission advises to approve ATFS for both category 1 and category 2 biomass. ATFS did not apply for approval for the "regional risk based approach" for biomass category 2.

ATFS certification starts at the forest management level, so the conditions on the first link in the Chain-of-Custody (CoC) from Table 2 in Annex D of the Dutch regulation are met.

#### 3.2 Findings for management criteria

A certification scheme can only be approved if the scheme complies with all management criteria. The ADBE concludes that the ATFS certification scheme complies with all management criteria. The table in paragraph 4.3 gives further details.

#### 3.3 Findings for individual sustainability criteria

As the minister of EZK will approve certification schemes per individual sustainability criterion from the Dutch legal regulation, the table below summarises the findings of the advisory commission per individual sustainability criterion. This table only shows the names of the principles, it does not show names or descriptions of the individual criteria, please refer to the table in paragraph 4.2 for further details. Green and yellow colours indicate the criteria for which the ADBE gives a positive advice to the Minister of EZK.

Principle	Number of the criterion as related to the respective principle to the left							
	1	2	3	4	5	6	7	8
P1: GHG emissions	*							
P2: Soil quality								
P3: Carbon sinks								
P4: Long-term carbon debt								
P5: Indirect Land Use Change (ILUC)								
P6: Laws and regulations								
P7: Biodiversity								
P8: Regulating effect and quality, health and vitality of forest								
P9: Production capacity, safeguard future of forests								
P10: Management system								
P11: Forest management by a group or regional association								
P12: Chain of custody system								
P13: Chain of custody system for a group								

\*: Please note that the commission scores only the second part of criterion 1.1 as the first part cannot be complied with through certification, see also the text under criterion 1.1 in paragraph 4.2.

**Legend (scoring table)**

Colour	Score	Meaning
Dark green :	3	The sustainability criterion is fully addressed by ATFS.
Light green :	2	The sustainability criterion is largely addressed the ATFS. Supplementary verification or another approved certification scheme is not needed.
Yellow :	c.o.	The sustainability criterion is not addressed by ATFS, but is covered otherwise, for instance through local or national legislation. Supplementary verification or another approved certification scheme is not needed.
Orange :	1	The sustainability criterion is partly addressed by ATFS. Supplementary verification or another approved certification scheme is needed for those elements that are not addressed.
Red :	0	The sustainability criterion is not or is insufficiently addressed by ATFS. Additional verification or another approved certification scheme is required for the entire sustainability criterion.
Grey :		No request for approval.

## 4 Assessment tables for certification scheme ATFS

This chapter contains three paragraphs on respectively a number of general topics of the ATFS application (4.1), on the sustainability criteria (4.2) and on the management criteria (4.3). The scores “3”, “2”, “1”, “0” and “c.o.” plus the colours that are used in the tables in this chapter, are explained in the legend on the previous page.

### 4.1 Assessment of classification of biomass and on first link in CoC to be certified

Annex D of the Dutch regulation contains two tables (which are copied into Annex I of this report) with a number of general requirements on biomass categories and on the first link in the CoC to be certified. The ADBE has assessed whether ATFS meets these requirements. One important aspect is whether ATFS can make a distinction between category 1 and 2 biomass. The ADBE has noted that information including the landowner’s name, the size of the parcel from which the wood is sourced and the group certificate under which the property is certified is available through the ATFS database. As a result, the commission concludes that ATFS can bring forward – to the next owner of the biomass – information on the size of the FMU and that therefore ATFS can be approved for both category 1 and category 2 biomass.

The ADBE has also noted that ATFS does not have a CoC system and depends on other CoC systems to bring the ATFS claim and the biomass category for which this claim is made to the end user. Finally the ADBE has also concluded that – as all ATFS certifications start at the forest owner – ATFS complies with the requirements on the first link in the CoC to be certified.

### 4.2 Assessment tables for sustainability criteria

The advisory commission has assessed whether the certification scheme ATFS addresses the Dutch sustainability criteria from the Dutch “*regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden*”. The assessment results are given in the tables below.

Two general comments		
0.1	<u>General comment on Guidance</u>	Guidance to certification standards is to the opinion of the commission not normative. As a result, compliance with a certain criterion cannot be based on guidance. As part of the assessment, the commission will take notice of guidance when it serves to clarify how criteria and indicators are to be interpreted. Guidance text can also lead to a lower score to the criterion if it causes confusion on how a criterion or an indicator is to be interpreted.
0.2	<u>General comment on the word “should”</u>	To the understanding of the commission, the word “should” expresses a recommendation, not a requirement. Our understanding is underlined by the ISO document “ <u>How to write standards</u> ”, page 4.



Principle 1: The use of biomass leads to a substantial reduction in greenhouse gas emissions calculated across the entire chain in comparison with the use of fossil fuels			
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"		ADBE judgement on whether ATFS complies with the sustainability criteria	Score
1.1a	The reduction in CO <sub>2</sub> -eq emissions is calculated to be a minimum of 70% per year on average based on the EU reference value. The average emissions have a maximum of 56 g CO <sub>2</sub> -eq/MJ for electricity and 24 g CO <sub>2</sub> -eq/MJ for heat.	To the opinion of the commission it is impossible to demonstrate compliance with this part a of the sustainability requirement by using a certification scheme, as compliance can only be demonstrated afterwards by verification (looking back at all consignments of biomass used during a year) and by looking at consignments that were possibly delivered using multiple certification schemes. As a result, the commission does not assess the certification scheme against this part of sustainability criterion 1.1.	0
1.1b	No consignment of biomass shall result in emissions above 74 g CO <sub>2</sub> -eq/MJ for electricity and 32 g CO <sub>2</sub> -eq/MJ for heat. The calculated maximum CO <sub>2</sub> -eq emission levels are based on the most recent European Commission publication on sustainability criteria for biomass and on the reference values provided for fossil fuels.	The ATFS standards do not include requirements on GHG emission reduction (as the standards limit themselves to the forest unit). The ATFS standards do not include requirements on collecting data at the FMU that are needed for calculating the GHG emissions through the supply chain. The commission concludes that Dutch sustainability criterion 1.1 is not addressed by ATFS.	

Principle 3: Production of raw biomass does not result in the destruction of carbon sinks			
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"		ADBE judgement on whether ATFS complies with the sustainability criteria	Score
3.1	Biomass is not sourced from permanently drained land that was classified as peat land on 1 January 2008, unless it can be demonstrated that the production and harvesting of the biomass does not result in water depletion of a previously undrained soil.	ATFS only certifies forest land. Forest activities are possible in peatland areas. In the ATFS standard itself, wetlands are mentioned in the guidance (not normative) as example of FORI (Forests of Recognized Importance). The standard itself says "where present, forest management activities should maintain or enhance forests of recognized importance" – which could be wetlands or peatlands. Also, the Standard itself refers to "maintaining or enhancing environment and ecosystems, including water" (Standard 4) and to "implementation of BMPs" (Performance Measure 4.1). Although the permits under the US Clean Water Act and State BMPs (Best Management Practices) aim to minimize impacts through BMPs, there is no requirement to demonstrate that the production and harvesting of the biomass on peatlands (classified as such since 2008) does not result in water depletion of a previously undrained soil – at least there do not seem to be any Regulatory or legal consequences. ATFS does not require evidence of this either. Trends learn that water depletion and loss of wetlands (including peatlands) is in practice still the case on Forest Wetlands in the US. The ADBE therefore concludes that sustainability criterion 3.1 is insufficiently addressed by ATFS.	0
3.2	Biomass is not sourced from land that was converted from wetland to an alternative, dryer ecosystem after 1 January 2008.	ATFS only certifies forest land. Forest activities are possible in wetland areas. In the ATFS standard itself, wetlands are mentioned in the guidance (not normative) as example of FORI. The standard itself says "where present, forest management activities should maintain or enhance forests of recognized importance" – which could be forests on wetlands. Also, the Standard itself refers to "maintaining or enhancing environment and ecosystems, including water" (Standard 4) and to "implementation of BMPs" (Performance Measure 4.1). Although the permits under the US Clean Water Act and BMPs aim to minimize impacts through BMPs, there is no	0

		<p>requirement to demonstrate that the production and harvesting of the biomass on wetlands (classified as such since 2008) does not result in conversion from wetland to an alternative, dryer ecosystem – at least there do not seem to be any regulatory or legal consequences. ATFS does not require evidence of this either. Trends learn that water depletion and loss of wetlands is in practice still the case on Forest Wetlands in the US. The ADBE therefore concludes that sustainability criterion 3.2 is insufficiently addressed by ATFS.</p>	
3.3	<p>Biomass is not sourced from wood plantations that were created by means of conversion of natural forests after 31 December 1997, unless the forest manager is not directly or indirectly responsible for the conversion. Biomass originating from wood plantations that were created after 1997 by means of conversion of degraded natural forests or degraded land is exempt from this requirement on condition that it is ecologically and economically justified to do so and that the forest manager is not directly or indirectly responsible for the degradation.</p>	<p>ATFS does not include a definition in their standard of forest land, nor do they indicate that after 31 December 1997 no natural forest can be converted anymore to production forest. This means that if a plantation is created by converting a natural forest after 1997, the (planted) forest could still be eligible for ATFS certification. As a result, the commission concludes that Dutch criterion 3.3 is insufficiently addressed by ATFS.</p>	0

**Principle 4: The use of biomass does not result in a long-term carbon debt**

<b>Sustainability criterion</b> from the Dutch “regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden”		<b>ADBE judgement</b> on whether ATFS complies with the sustainability criteria	<b>Score</b>
4.1	<p>The forest management unit where the wood is sourced is managed with the aim of retaining or increasing carbon stocks in the medium or long term.</p>	<p>Landowners are ‘advised’ to take a practical approach in promoting the health of their forests (see indicator 5.3.1). This may include carbon where identified, according to the Guidance (not normative). Indicator 1.1.2 indicates that the plan preparer should consider describing and evaluating resource elements, such as carbon. This is a consideration and recommendation and not a clear requirement. Although ATFS does recognize the importance of carbon to forest health and productivity, ATFS does not set normative requirements for its landowners to manage the forest land with the aim to retain or increase carbon stocks in the medium or long term. The ADBE therefore concludes that sustainability criterion 4.1 is insufficiently addressed by ATFS.</p>	0
4.2	<p>Biomass is not sourced from stumps unless these stumps had to be removed from the site for other reasons than wood or biomass production.</p>	<p>ATFS does not include a criterion or indicator on stumps. The ATFS scheme manager indicated that in the US for family landowners it is not standard practice to harvest stumps as it is not economically feasible. The ADBE notes that experiences in other countries show that there can be a market for stumps. As market conditions can change (for instance through an increased demand of biomass in the energy market) and as there is no mechanism to correct the approval of certification schemes once markets change (the approval is permanent instead of temporary), this criterion can to the opinion of the ADBE only be covered if the certification scheme includes a clear requirement. The ADBE concludes that the criterion is not addressed by ATFS.</p>	0
4.3	<p>On average less than half the volume of the annual round wood harvest from forests is processed as biomass for energy generation. Round wood from thinnings or from production forests with a rotation period of 40 years or less is exempt from this requirement.</p>	<p>This criterion is not included in the ATFS standard, other than that the ATFS scheme manager indicated that the free market will probably prevent more than 50% of the wood to go to energy purposes (because the other market products have a higher value). However, market conditions can change, for instance through stimulation (renewable energy obligations, subsidies) on energy production from biomass. The ADBE concludes that ATFS does not address this criterion.</p>	0

Principle 5: Biomass production does not result in Indirect Land Use Change (ILUC)			
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"		ADBE judgement on whether ATFS complies with the sustainability criteria	Score
5.1	Biomass sourced from bioenergy plantation systems that were planted after 1 January 2008 has a demonstrably low ILUC risk. Biomass from forest management units smaller than 500 hectares is exempt from this requirement.	The ATFS standard does not include a reference to January 2008, nor to (high or) low ILUC risk. It is not possible to establish through ATFS whether biomass was planted before or after 2008 and whether or not there was an ILUC risk. Therefore, the ADBE concludes that his criterion 5.1 is not addressed by ATFS.	0

Principle 6: Relevant international, national, regional and local laws and regulations are complied with			
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"		ADBE judgement on whether ATFS complies with the sustainability criteria	Score
6.1	The forest manager holds the legal right to use the forest.	Under ATFS the landowner must hold the title to the property (see ATFS definition of landowner) and shall comply with all relevant laws (Performance Measure 2.1). Landowner requirements may be delegated to a designated representative but landowners must be engaged in the decision to pursue certification. The landowner has to hold the legal right to use the forest. The Dutch definition of 'forest manager' is: "de eigenaar, concessiehouder of persoon die in een andere hoedanigheid verantwoordelijk is voor het beheer en de exploitatie van een bosbeheereenheid". Although the landowner may delegate some responsibilities to a representative, he remains finally responsible in the management / certification decisions. The ADBE concludes that Dutch criterion 6.1 is fully addressed by ATFS.	3
6.2	The forest manager complies with all obligations to pay taxes and royalties.	In Performance Measure 2.1, the ATFS scheme requires that the landowner shall comply with all relevant federal-, state-, county- and municipal laws, regulations and ordinances. As in the US timber taxation is a federal income tax, the most relevant taxes for the forest manager are covered under US legislation. As a result, Dutch criterion 6.2 is largely addressed and compliance depends on US Law. Therefore, the ATFS score for this criterion is "covered otherwise (c.o.)".	C.O.
6.3	Anti-corruption legislation is complied with. If no anti-corruption legislation exists, the forest manager takes alternative anti-corruption measures proportionate to the scale and intensity of the management activities and the risk of corruption.	The forest manager/owner shall comply with all relevant Federal, State, Country and Municipal laws (Performance Measure 2.1). Although the ATFS standard itself does not refer specifically to 'anti-corruption measures, the presence of Anti-corruption legislation (that needs to be complied with through Performance Measure 2.1) in the US is considered robust enough, see US Foreign Corrupt Practices Act (FCPA). <a href="http://www.business-anti-corruption.com/anti-corruption-legislation/fcpa-foreign-corrupt-practices-act">http://www.business-anti-corruption.com/anti-corruption-legislation/fcpa-foreign-corrupt-practices-act</a> . The US has a sufficiently high score on the Corruption Perception Index, which is a requirement for the score "c.o.". Therefore, the ADBE concludes that Dutch criterion 6.3 is covered through US legislation and hence scores "covered otherwise (c.o.)".	C.O.

Principle 7: Biodiversity is maintained and where possible enhanced			
	Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"	ADBE judgement on whether ATFS complies with the sustainability criteria	Score
7.1	Sites with a high conservation value and representative areas of the forest types that are found in the forest management unit have been identified and are protected and where possible enhanced. The sites may contain one or more of the following values: diversity of species, ecosystems and habitats, ecosystem services, ecosystems at landscape level and cultural values.	The commission is of opinion that – in order to address criterion 7.1 – the term HCV (or FORI) must be defined and implemented in the normative part of the scheme, which ATFS has not (yet) done; the description of the meaning of FORI's is put in a guidance text which is not normative and indicator 5.4.1 contains the word "should". The commission concludes as follows. The requirement that HCV's shall be identified and protected is not covered by ATFS as the relevant ATFS indicator 5.4.1 contains the word "should" and not "shall" and as ATFS indicator 7.1.1 contains the wording "reasonable effort to locate" which does not address the "identify" from Dutch criterion 7.1. As a result, the ADBE concludes that Dutch sustainability criterion 7.1 is insufficiently addressed by ATFS.	0
7.2	Measures have been taken to protect endangered plant and animal species and, if applicable, to increase the populations and enhance the habitats of these species.	ATFS requires that the landowner shall confer to determine occurrences of threatened or endangered species on the property and their habitat requirements (indicator 5.1) and forest management activities shall incorporate measures to protect identified threatened or endangered species (indicator 5.2) – also through FORI (indicator 5.4.1).  The threatened and endangered species are those defined by national lists in the US Endangered species act (ESA) and federal lists by the US Fish and Wildlife Service (FWS). These are distinct from IUCN Red lists. Although some species may be under-recognized on Federal level (see this <a href="#">scientific letter</a> ), analysis shows that the combined ESA/FWS lists also contain many species that are not included on the IUCN red lists. The Dutch legislation contains a definition for endangered plant and animal species which reads (translated) "plant and animal species that at a minimum are classified as threatened on the global IUCN red list and on the IUCN guidelines for the regional application of the IUCN red list".  The commission looked in detail at the scientific letter (source 13), keeping in mind the definition in Dutch legislation for endangered plant and animal species. The commission has observed that – since that letter was published in 2011 – some of the bird species changed status within IUCN (for instance from "Endangered" to "Near threatened") and that some other species which early 2011 were not included in the ESA list are included in the most recent IUCN Red List. Nevertheless the commission has also observed some species that were not included in the ESA list in 2011 and still are not included today.  It might be that species that are not included in the ESA list are included in relevant lists at U.S. State level. However, the commission is of opinion that it would be very time-consuming – if not impossible as the lists change over time – to check that species listed as 'threatened' (including the categories Vulnerable, Endangered and Critically Endangered) on the global IUCN red list are covered either by the federal ESA list or by lists in the States where these species occur. Please note that such an exercise should be performed not only for birds but also for IUCN listed plants, insects, crustaceans, gastropods, amphibians and mammals.  The commission can quite easily find other examples such as some small mammals. The commission cannot conclude that Dutch criterion 7.2 – taking into account the normative definition for endangered plant and animal species in the Dutch legislation – is addressed through the US Endangered Species Act.  The commission further observes that ATFS does not specifically require taking measures (if applicable) to increase the populations and enhance the habitats of endangered plant and animal species. The ADBE therefore concludes that Dutch sustainability criterion 7.2 is insufficiently addressed by ATFS.	0
7.3	The conversion of forests within the forest management unit to other forms of land use,	ATFS does not permit the conversion of forests to permanently non-forested land through indicator 3.1.1., however, ATFS does not forbid the conversion of forests to wood plantations, and hence it must be checked if for this	0

	<p>including wood plantations, is not permitted unless:</p> <ul style="list-style-type: none"> <li>- the area concerned is small which means the total converted area over the years is no greater than 5% of the area of the forest management unit on benchmark date 1 January 2008; and</li> <li>- it clearly leads to long-term advantages for nature conservation; and</li> <li>- there is no damage or threat of damage to sites with a high conservation value.</li> </ul>	<p>conversion all 3 exemption conditions of Dutch criterion 7.3 are met:</p> <ol style="list-style-type: none"> <li>1. <u>5% limit</u>: ATFS does not contain any limitation on the size of conversion of forests to wood plantations. As a result, this exemption condition is not met.</li> <li>2. <u>Long-term advantages</u>: ATFS does not mention whether there should be long-term advantages when converting forests to wood plantations, so this condition is also not met.</li> <li>3. <u>No damage or threat to special sites</u>: Wood plantations and small non-forest area should be part of ATFS certification and meet the ATFS standards. Special sites are respected under ATFS. This condition is covered.</li> </ol> <p>As not all the exemption conditions are met, the ADBE concludes that ATFS insufficiently addresses criterion 7.3.</p>	
7.4	<p>In the case of wood plantations, there is a preference for native species, and a relevant percentage of the plantation must be able to revert to natural forest at a later stage.</p>	<p>Dutch criterion 7.4 consists of two parts:</p> <ol style="list-style-type: none"> <li>1) The first part is on preference for native species. In the ATFS guidance, it is indicated that the use of native species is preferred. As this language is non-normative, this part is not covered by ATFS.</li> <li>2) The second part of the Dutch criterion states that a relevant percentage of the plantation must be able to revert to natural forest. The ATFS Standard applies to a diverse array of different kinds of forests lands in the US. This includes planted and naturally regenerated forests. ATFS mentions that "Harvested forest land shall achieve adequate stocking of desired species reflecting the landowner's objectives (3.1.1). ATFS does not require that a percentage of the plantation must be able to revert to natural forest at a later stage. Therefore this part is not covered by ATFS.</li> </ol> <p>The ADBE concludes that sustainability criterion 7.4 is insufficiently addressed by ATFS.</p>	0
7.5	<p>Exploitation of non-timber forest products, including products from hunting and fishing, is regulated, monitored and controlled, among others to safeguard the maintenance of the biodiversity in the forests.</p>	<p>ATFS requires that forest product harvests (including NTFPs) are to be conducted in accordance with the landowners objectives and should consider other forest values. (Standard 8); land owner management objectives should be monitored (1.1.3). Beside this, land owners shall comply with relevant laws, regulations and ordinances. US law prohibits illegal activities, furthermore all materials from the forest (not animals) are regulated by ATFS. Beside this, State and local laws and programs for NTFP protection are created on a product-specific basis. Permits are required for fishing and hunting.</p> <p>The ADBE concludes that there is only a low risk of insufficient implementation of the regulations on exploitation of NTFPs, and hence concludes that criterion 7.5 is largely addressed by ATFS requirements plus US state and federal laws.</p>	2

### Principle 8: The regulating effect and the quality, health and vitality of the forest are maintained and where possible enhanced

	Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"	ADBE judgement on whether ATFS complies with the sustainability criteria	Score
8.1	<p>The soil quality of the forest management unit is maintained and if necessary improved, with special attention to coasts, river banks, erosion-sensitive areas and sloping landscapes.</p>	<p>In Standard 4 ATFS makes reference to the state forestry Best Management Practices that are applicable in each State. Forest landowners have to meet or exceed these requirements (Performance Measure 4.1). The commission made a selection of states from which it studied the BMP's. The states selected were Alabama, Georgia, South Carolina and Texas. According to a recent report (source 29, table 6 on page 20), these four states have a high ATFS certified acreage. Moreover, within the US the South-east is the most important biomass sourcing area for the Netherlands. As a result, the commission feels confident to draw conclusions based on BMP's from this sample of four US states.</p> <p>The sample of selected BMPs shows that specific best practices in relation to slopes, river banks and erosion are</p>	C.O.

		mentioned to maintain soil quality. The ADBE concludes that, through the combination of ATFS requirements in standard 4 and best practices mentioned in the BMPs, Dutch criterion 8.1 is largely addressed by ATFS and scores “covered otherwise”.	
8.2	The water balance and quality of both groundwater and surface water in the forest management unit and downstream outside the forest management unit are at least maintained and where necessary improved.	According to ATFS indicator 4.1.1, landowners must implement specific state forestry BMPs that are applicable to the property. The guidance to indicator 4.1.1 (which is not normative) addresses water quality. Best practices mentioned in the state-level BMPs address water quality and – to a lesser extent – water quantity and water balance. Overall the commission concludes that Dutch criterion 8.2 is largely addressed by ATFS, and the score is “covered otherwise”.	C.O.
8.3	Important ecological cycles present in the forest management unit are preserved, including carbon and nutrient cycles.	The ATFS certification scheme does mention that ecosystems should be maintained (Standard 4). The ATFS standard includes forest health in a clear normative way, but there is no specific reference to preservation of nutrient and carbon cycles. “Maintenance of ecosystems” is not part of normative wording of the standard, and “promoting forest health” is too general in comparison to the Dutch criterion and therefore the ADBE concludes that ATFS insufficiently addresses Dutch criterion 8.3.	0
8.4	Unnecessary damage to ecosystems is prevented by applying <i>reduced impact logging</i> and the most suitable road construction methods and techniques for local conditions.	The definition of “Reduced impact logging” in the Dutch legislation reads (translated by the commission): “Harvest techniques and methods that were developed to avoid unnecessary damage to forests, to the environment and to harvested wood, and that lead to save labour conditions.”  The criterion consists of two parts: <ul style="list-style-type: none"> <li>• <u>Road construction</u>: The cross-check learns that BMPs around road construction is mentioned in the selected BMPs (see the commissions’ response under Dutch criterion 8.1). The commission concludes that this part of the criterion is addressed by ATFS with indicator 4.1.2 and BMP’s.</li> <li>• <u>Reduced impact logging</u>: The cross-checked BMPs all stress the importance to minimize impacts with focus on environment (water quality), avoiding impacts (general) and avoiding disturbance. This covers, at least for a larger part, the elements addressed in the Dutch definition for reduced impact logging. Therefore the commission concludes that this part of criterion 8.4 is largely covered by the combination of ATFS and state-level BMPs.</li> </ul> <p>Overall the ADBE concludes that ATFS largely addresses Dutch criterion 8.4 on the basis of BMP’s, the score is therefore “covered otherwise”.</p>	C.O.
8.5	If fires are used to achieve forest management objectives, such as regeneration of specific tree species, then adequate control measures have been taken.	ATFS Indicator 5.3.1 mentions that a landowner should make practical efforts to promote forest health including prevention and control of amongst others fires. Prescribed burning includes the controlled burning of e.g. piles. This shall conform with the landowner’s objectives (Performance Measure 4.3). Adequate control measures are not described as such in ATFS. The guidance under Performance Measure 4.3 makes reference to State laws and BMPs which shall be complied with as a minimum under ATFS. The states have BMPs for fire that tier to the laws and permitting, as well. The commission looked into the details of four BMPs (for details see criterion 8.1) and concludes that they include regulations and BMPs on prescribed burning. The ADBE concludes that, through the combination of ATFS requirements, existing Laws and best practices mentioned in the BMPs, Dutch criterion 8.5 is largely addressed by ATFS. The score is “covered otherwise” as the criterion is largely covered through US legislation and state BMP’s.	C.O.
8.6	The forest management measures are designed to prevent and control diseases and pests where these form a threat to natural capital.	ATFS Performance Measure 4.2 states that activities shall be considered to control pests. Prevention is not specifically mentioned. Also, according to indicator 5.3.1 the landowner should make practical efforts to promote forest health, including prevention, control or response to disturbances such [...] ... invasive species and other pests... [...]..., to achieve specific management objectives. However, ATFS Performance Measure 5.3 and indicator 5.3.1 include the word “should” causing that a landowner can choose not to follow this performance measure and indicator. Activities for the control of pests are mentioned in ATFS in normative language in Performance Measure 4.2; the	2

		possible control of diseases is only mentioned in guidance but promoting forest health is normative language. The commission is of opinion that the wording of the ATFS performance measure is comparable to the Dutch criterion. As a result, the ADBE concludes that ATFS largely addresses Dutch criterion 8.6.	
8.7	The use of chemicals is only permitted if ecological processes and the optimal deployment of sustainable alternatives prove insufficient. Pesticides classified as Type 1A and 1B by the World Health Organisation and chlorinated hydrocarbons are not permitted.	<p>The Dutch criterion 8.7 consists of 2 parts:</p> <ul style="list-style-type: none"> <li>• <u>Alternatives to chemical pesticides</u> ATFS indicator 4.2.1 reads "landowners should evaluate alternatives to pesticides". As the indicator contains the word "should" it is a recommendation and not binding and can be considered equivalent to guidance (see also general note 0.2). As a result, ATFS insufficiently addresses this part of criterion 8.7</li> <li>• <u>Pesticides classified as Type 1A and 1B</u> ATFS indicator 4.2.2 stipulates that pesticides shall be EPA approved. The EPA (US) uses its own classification system to label hazardous pesticides in the US, which is a different classification system than the Globally Harmonized System (GHS) that uses the classification of the WHO. The ATFS scheme manager analysed and compared all of the WHO type 1A and 1B chemicals with the EPA's Office of Pesticide Programs' Pesticide Chemical Registry under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Of the 86 chemicals on that list, only three are currently registered in the US: Chlorophacinone [ISO], Diphacinone [ISO] and 3-Chloro-1,2-propanediol [C]. These chemicals are only used as rodenticides or to sterilize or control rodents; none of these three chemicals are approved (or would be especially useful) for use in forestry. Chlorinated hydrocarbons are, generally, phased out of use in the US except; none are registered for approved uses with EPA... As a result, the ADBE concludes that the second part of the criterion is largely covered by ATFS.</li> </ul> <p>For the total criterion 8.7 the ADBE concludes that the criterion is partly addressed by ATFS, the first part is not covered, the second part is covered.</p>	1
8.8	The accumulation of inorganic waste and litter is prevented or such waste and litter is collected, stored in approved areas and disposed of responsibly.	<p>This requirement consists of two parts:</p> <p>(i) the prevention of waste <u>OR</u></p> <p>(ii) the responsible collection, storage and disposal of waste.</p> <p>In the guidance to ATFS, litter control is mentioned but not in the standard itself. ATFS points to state BMP's. A cross-check of selected BMPs (see criterion 8.1) shows there is variation in requirements on waste control between the BMPs.</p> <p><u>(i) Prevention of waste:</u> None of the four BMPs refer to the prevention of waste and litter. Therefore, the first part of the requirement is not covered by the four selected States through existing legislation and policies.</p> <p><u>(ii) Responsible collection, storage and disposal of waste:</u> All BMPs refer to responsible disposal of waste in approved areas – according to existing regulations. For the selected States, it can be assumed that this part is covered.</p> <p>As the Dutch criterion contains the word "or" only one of the two parts needs to be covered. As a result, the ADBE concludes that Dutch criterion 8.8 is addressed by State BMP's (score "covered otherwise").</p>	C.O.

**Principle 9: The production capacity for wood products and relevant non-timber forest products is maintained in order to safeguard the future of the forests**

<b>Sustainability criterion</b> from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoeleinden"		<b>ADBE judgement</b> on whether ATFS complies with the sustainability criteria	<b>Score</b>
9.1	The production capacity of all forest types represented in the forest management unit is	ATFS indicator 5.3.1 states that landowners should make practical efforts to promote forest health, which is defined as the "condition of a forest derived from consideration of such factors as its age, structure, composition, function,	0

	maintained.	vigor, vitality...". Indicator 8.2.1 does indicate that the management activities shall be conducted i..[...]. to maintain the potential of the property to produce forest products.., while standard 3 indicates that the Landowner has to complete timely restocking of desired species of trees on harvested sites and non-stocked areas; desired species – which are to be defined by the landowner and his/her objectives. ATFS requirements are based on land owner objectives, but there is reference to maintaining the production potential of forest products (indicator 8.2.1). Because of the non-binding formulation of ATFS indicators 5.3.1 and 5.4.1 including the word "should", and the fact that indicator 8.2.1 relates to land owner objectives and the production potential of his overall property (which is different from 'all forest types' in his FMU), the ADBE concludes that Dutch criterion 9.1 is insufficiently addressed by ATFS.	
9.2	The forest management unit is sufficiently protected against all forms of illegal exploitation of timber and non-timber forest products, including hunting and fishing, illegal establishment of settlements, illegal land use, illegally initiated fires and any other illegal activities.	ATFS requires compliance with all laws, which means illegal activities are not allowed. ATFS also requires in indicator 2.1.1 that "the landowner will correct conditions that led to adverse regulatory actions, if any". Guidance (non-normative) further stipulates that, in case there is evidence of past non-conformance, the landowner must show proof of a good-faith effort to remedy the non-conformance. Although ATFS explains how is to be dealt with correcting non-conformances, it does not set requirements on how the landowner can protect himself against illegal actions from others. Next to ATFS requirements, various Laws (on both local, State and Federal level) exist to e.g. (i) penalty illegal harvest and trade of timber (products) and plants or (ii) to report, investigate and penalize timber theft. The ADBE conclude that Dutch criterion 9.2 is largely addressed through a combination of ATFS requirements and existing legislation in the US. The score is therefore "covered otherwise".	c.o.

Principle 10: Sustainable forest management is achieved through a management system			
Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"		ADBE judgement on whether ATFS complies with the sustainability criteria	Score
10.1	The forest management system is designed to achieve the objectives of a forest management plan and covers the inventory, analysis, planning, implementation, monitoring, evaluation and adjustment cycle.	<p>ATFS has a clear reference to a management plan and management activities for the forest. All aspects that need to be covered according to the Dutch criterion are covered by ATFS by indicators 1.1.2 and 1.1.3, Performance Measure 8.2 and the ATFS glossary:</p> <ul style="list-style-type: none"> <li>• To achieve objectives: See 1.1.2 stipulating that the management plan shall describe landowner's objectives: covered</li> <li>• inventory analysis: See 1.1.2 stipulating that the management plan shall describe current forest conditions: covered</li> <li>• planning: the ATFS glossary contains a harvest plan and this is part of a management plan: covered</li> <li>• implementation: Where present and relevant to the property, the plan shall describe management activities related to these resource elements: covered</li> <li>• monitoring: forest product harvests and other management activities are to be monitored. (Perform. Measure 8.2). Also, the Landowner should monitor for changes that could interfere with the management objectives: covered</li> <li>• Evaluation: Indicator 1.1.3 states that "When problems are found [in monitoring], reasonable actions are taken, which is a form of evaluation and adjustment: sufficiently covered.</li> <li>• Adjustment cycle: See above; also, reflected in the definition of management plan.</li> </ul> <p>The cycle of inventory, analysis, planning, implementation, monitoring, evaluation and adjustment is covered under ATFS. The ADBE concludes that Dutch sustainability criterion 10.1 is fully addressed by ATFS.</p>	3



10.2	<p>A forest management plan is drawn up that at least includes:</p> <ul style="list-style-type: none"> <li>- a description of the current condition of the forest management unit;</li> <li>- long term goals for the ecological functions of the forest management unit;</li> <li>- the annual allowable cut per forest type and, if applicable, the annual allowable harvest of non-timber forest products based on reliable and current data;</li> <li>- budget planning for the implementation of the forest management plan.</li> </ul>	<p>The Dutch criterion requires that there is a forest management plan, which is also a requirement under ATFS (see Standard 1).</p> <p>Next to this, the Dutch criterion consists of 4 parts:</p> <ul style="list-style-type: none"> <li>- <u>A description of the current condition of the FMU</u> ATFS clearly indicates in Indicator 1.1.2 that the management plan shall describe current forest conditions. Therefore, the ADBE concludes that this part is covered by ATFS.</li> <li>- <u>Long term goals for the ecological functions</u> In Indicator 1.1.2 ATFS indicates that the forest management plan shall demonstrate 'consideration' of the resource elements forest health, soil, water, wood and fibre production (which could be considered ecological functions of the FMU). The guidance indicates that "Landowner objectives are concise, high-level statements of what the landowner hopes to accomplish through his or her management". As land-owner objectives do not automatically cover long-term ecological goals, the commission concludes that this part is not covered by ATFS.</li> <li>- <u>Average annual allowable cut</u>. ATFS indicator 8.1.3 indicates that forest product harvests should be recorded, and indicator 8.2.1 states that harvests, utilization, removal and other management activities shall be conducted to maintain the potential of the property to produce forest products. This does not include an upper limit of the annual volume that can be harvested without reducing overall forest capacity. As the requirement of defining an "annual allowable cut per forest type and, if applicable, the annual allowable harvest of non-timber forest products based on reliable and current data" is missing, the ADBE concludes that ATFS does not cover this part of criterion 10.2.</li> <li>- <u>Budget planning</u>: this aspect is not included in ATFS.</li> </ul> <p>The ADBE concludes that the Dutch criterion 10.2 is partially addressed by ATFS. Additional verification and/or another approved certification scheme is needed to demonstrate compliance with the requirements on the long term goals for the ecological functions, on average annual allowable cut per forest type, and on budget planning.</p>	1
10.3	<p>Essential elements for the management of the forest are indicated on maps.</p>	<p>ATFS requires in the management plan a map depicting significant forest-related resources (see ATFS indicator 1.1.2) Mapping of FORI is only required in the non-normative guidance to ATFS indicator 5.4.1. The ADBE therefore concludes that ATFS largely addresses Dutch criterion 10.3.</p>	2
10.4	<p>The implementation of the forest management plan is periodically monitored and the ecological effect of the forest management is evaluated.</p>	<p>This criterion consists of 2 parts:</p> <ul style="list-style-type: none"> <li>• <u>The implementation of the plan is periodically monitored</u> ATFS requires through indicator 1.1.3 that changes that could interfere with the management objectives are monitored – as well as forest harvest products and other management activities (8.2). Furthermore, in the (non-normative) guidance, it is indicated that land owners are encouraged to keep a written record of monitoring observations. Periodic monitoring is, however, not indicated in ATFS standard. Periodic monitoring takes place but the requirement is put in non-normative language (guidance) only. This is not sufficient to cover this part of the criterion.</li> <li>• <u>The ecological effect of the forest management is evaluated</u> Indicator 1.1.3 states that "when problems are found in monitoring, reasonable actions are taken". This is different from evaluating the ecological effect of the forest management. As ATFS does not contain requirements on evaluation, the commission concludes that this part is not covered by ATFS .</li> </ul> <p>Therefore, the ADBE concludes that Dutch criterion 10.4 is insufficiently addressed by ATFS.</p>	0
10.5	<p>The forest management is implemented by professional office and field staff, whose expertise and knowledge is maintained by means of an effective and regular training programme.</p>	<p>ATFS mentions in Performance Measure 8.1 that the landowner should use qualified staff, this is not as strict as 'shall'. The requirement on training and obtaining advice (2.1.2) is indicated in the same way: "Landowner should obtain advice from appropriate qualified natural resource professionals or qualified contractors....". The ATFS requirements are weaker in language than the Dutch requirements . The commission has considered that this is about small scale landowners, who do not have their own staff. The landowners will however work with contractors who shall be trained. The ADBE concludes that Dutch criterion 10.5 is insufficiently addressed by ATFS</p>	0

		because of the word "should" instead of "shall".	
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Principle 11: Forest management by a group or regional association offers sufficient safeguards for sustainable forest management			
	Sustainability criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"	ADBE judgement on whether ATFS complies with the sustainability criteria	Score
11.1	A group or regional association is led and supervised by an independent legal entity.	ATFS includes in Administration section 1.1 the requirement that a group (IMG) must be a legal entity. The group individuals are managed by a group manager, who is part and designated by this independent legal entity. The commission therefore concludes that Dutch criterion 11.1 is fully addressed by ATFS.	3
11.2	A group or regional association meets the requirements of sustainable forest management (requirements 6.1 through 10.5). The separate forest management activities of the individual members of the group or regional association shall also meet these requirements if applicable for the management of the forest concerned.	<p>This criterion consists of 2 parts:</p> <ul style="list-style-type: none"> <li><u>The group meets the requirements of SFM</u> In ATFS the group organisation must have a written commitment to sustainable forestry and the group organization must adhere to ATFS eligibility requirements. Therefore, the commission concludes that ATFS covers this part of the criterion.</li> <li><u>The individual group members meet the requirements of SFM</u> The Group Organization must ensure Group Members have a written commitment to sustainable forestry, and are notified to all requirements. The group organization must establish a monitoring system to monitor conformance with ATFS standards.</li> </ul> <p>The commission concludes that ATFS fully addresses Dutch criterion 11.2.</p>	3

### 4.3 Assessment table for management criteria

The table below contains details of the assessment of the advisory commission on the ATFS certification scheme against the Dutch management criteria from the "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden".

	Management criterion from the Dutch "regeling conformiteitsbeoordeling vaste biomassa voor energiedoelinden"	ADBE judgement on whether ATFS complies with the management criteria	Score
1	A widely supported need exists for the scheme and for the conformity assessments that are performed based on the scheme.	In the US there is a clear division in roles between the PEFC-recognized schemes SFI and ATFS, where ATFS serves the small family forest landowners in the US. The ATFS scheme has almost 10 million hectare of forest land certified. The commission's opinion is that a need from a number of forest owners, industries and businesses can be considered to be a "widely supported need". The commission observes that "widely supported need" is not defined in the legislation under which this assessment is made. The commission is of opinion that "widely" does not mean "all kind of stakeholders", but rather means "a sufficient number of stakeholders". As quite a large number of stakeholders have an interest in the ATFS scheme, the commission concludes that there was a widely supported need for the scheme and for the conformity assessments based on the scheme, and hence considers ATFS to fully address management criterion 1.	3

2	The development of the scheme is transparent and participation in the process of development of the scheme is open to anyone.	<p>ATFS works with an Independent Standard Review Panel (ISRP). The process of appointing a new ISRP is publically announced, and all communications are made available upon request. The <a href="#">ATFS website</a> gives an overview of the review process, including the members and the minutes of the Independent Standards Review Panel (ISRP). The ATFS Board of Directors (BOD) will invite a representative cross-section of forestry community leaders to participate in the ISRP. There is also a public consultation, so although not everyone can join the ISRP, everyone can provide input. The scheme development is considered transparent and open to everyone; through various forms (written input, participation in panels).</p> <p>The commission has looked into a full list of comments received (provided by the ATFS scheme manager) and at publicly available summary reports on ISRP meetings where changes to the ATFS standard were discussed. The ADBE concludes that – based on the information received and studied – that Dutch management criterion 2 is largely addressed by ATFS.</p>	2
3	The methods related to the development of the scheme are documented and at least include the organisations participating in the development of the scheme and the decision-making process for the development of the scheme.	<p>All comments around the standard setting procedure are recorded by the ATFS scheme managers. These comments are made available to the public (see clause 7.1 of the AFF Standard Setting procedure). This is done via the webpage <a href="#">Summary of Engagement Process and Feedback Received</a> which gives a summary but which does not give details on comments received and whether these led to changes in the standards.</p> <p>Also, the comments, responses and respective modifications to the Standard shall be made available to all members of the ISRP and the Commentor’s respective organization(s). The ADBE has looked into a full list of comments received (provided by the ATFS scheme manager) and at publicly available summary reports on ISRP meetings where changes to the ATFS standard were discussed.</p> <p>The ADBE concludes that ATFS fully addresses Dutch management criterion 3.</p>	3
4	It can be demonstrated that during the development of the scheme and as part of the scheme management expertise of the sustainability requirements covered by the scheme is applied.	<p>The AFF Board of Directors (BOD) invites forestry community leaders with a stake in AFF’s Tree Farm Programme. Next to that qualified individuals are part of the independent standards review panel. Therefore, sufficient expertise of the sustainability requirements is applied and therefore the ADBE concludes that Dutch management criterion 4 is fully addressed by ATFS.</p>	3
5	The scheme is publicly available or accessible under fair, reasonable and non-discriminatory conditions.	<p>The ATFS standard documents are freely available on the website via <a href="https://www.treefarmssystem.org/intro-to-the-2015-2020-standards-of-sustainability">https://www.treefarmssystem.org/intro-to-the-2015-2020-standards-of-sustainability</a>. The standard setting procedures stipulate that interpretations are also publicly available, as well as minutes, communications etc.</p> <p>The commission concludes that management criterion 5 is fully addressed by ATFS.</p>	3
6	The scheme manager limits the use of the scheme to the conformity assessment bodies he has entered into an agreement with, unless the scheme owner itself is the only conformity assessment body.	<p>The use of conformity assessment bodies is limited through the requirement of accreditation as approval procedure. The ATFS Group Standard, section 4.1 requires the group organisation to contract with an accredited certification body. The commission received information from ATFS demonstrating that this requirement also applies to individual certificates. The ADBE concludes that management criterion 6 is fully addressed by ATFS.</p>	3
7	The scheme manager has enforced effective procedures for handling complaints and appeal. Appeal is treated by persons that are not directly involved in the development and the management of the document.	<p>The ATFS appeal procedures, in combination with the ATFS Inspector Compliance Policy provide sufficient assurance that there are no conflicted interests, and that appeals are treated by persons that are not directly involved in the development and the management of the document. The commission concludes also that appeal against a decision on a complaint is possible. Therefore the ADBE concludes that management criterion 7 is fully addressed by ATFS.</p>	3
8	The scheme manager has a scheme version management system in place.	<p>Every five year the standard is revised. The standard documents contain information about the version and the revision year. As a result the ADBE concludes that ATFS fully addresses Dutch management criterion 8.</p>	3

## 5 Documents used for the assessment of certification scheme ATFS

### 5.1 Documents submitted by the scheme manager as part of the request for approval

1. [American Forest Foundation \(AFF\) 2015-2020 Standards of Sustainability](#)
2. [American Forest Foundation, Standards of Sustainability for Forest Certification, Standard Setting Procedures](#), Approved July 2006 by AFF Board of Directors, Amended January 2007 with Board approved definition of consensus
3. [American Forest Foundation Disputes and Appeals Procedures](#)
4. [ATFS Eligibility Requirements and Guidance for Certification](#)
5. [ATFS Independently Managed Group \(IMG\) Certification Standards 2015-2020](#)
6. [ATFS Management Plan Addendum for the 2015-2020 Standards of Sustainability](#)

### 5.2 Additional documents assessed by the commission

7. US [Clean Water Act](#) (CWA)
8. US [State specific Best Management Practices](#) (BMP's)
9. [BMP's of Florida](#)
10. [BMP's of Georgia](#)
11. [BMP's of North Carolina](#)
12. U.S. [Endangered Species Act](#) (ESA)
13. Harris, J.B.C. et al, [Conserving imperiled species: a comparison of the IUCN Red List and U.S. Endangered Species Act](#), Conservation Letters 00 (2011)
14. US [Fish and Wildlife Service](#)
15. US [Federal Insecticide, Fungicide and Rodenticide Act](#) (FIFRA)

### 5.3 Documents provided by stakeholders as part of their external input

16. US [Resource Conservation and Recovery Act](#) (RCRA).
17. Colnes, A. et al. 2013. [Biomass Supply and Carbon Accounting for Southeastern Forests](#)
18. Galik, C., Abt, R. 2015. [Sustainability guidelines and forest market response: an assessment of European Union pellet demand in the southeastern United States](#). GCB Bioenergy.
19. Wang, W., Dwivedi, P., Abt, R., Khanna, M. 2015. [Carbon savings with transatlantic trade in pellets: accounting for market-driven effects](#). Environmental Research Letters.
20. Costanza, J. K., Abt, R. C., McKerrow, A. J. Collazo, J. A. 2016. [Bioenergy production and forest landscape change in the southeastern United States](#). GCB Bioenergy.
21. David N. Wear & John G. Greis (Eds.), USDA Forest Service, [The Southern Forest Futures Project: Technical Report 213](#) (Aug. 2013).
22. Dogwood Alliance, NRDC, and SELC, [European Imports of Wood Pellets for "Green Energy" Devastating U.S. Forests](#) (June 29, 2017).
23. Scheck, J., Jeanne Dugan, I. 2013. [Europe's green-fuel search turns to America's forests](#). Wall Street Journal.
24. Critical Ecosystem Partnership Fund. 2016. [Announcing the World's 36th Biodiversity Hotspot: The North American Coastal Plain](#)
25. European Environment Agency Scientific Committee, [Opinion on Greenhouse Gas Accounting in Relation to Bioenergy](#). 2011.
26. [The Impacts of the Demand for Woody Biomass for Power and Heat on Climate and Forests](#), Chatham House, 2017.

27. [Multi-functionality and sustainability in the European Union's forests](#), the European Academies Science Advisory Council. 2017.
28. Fox, T. R., Jokela, E. J. & Allen, H. L. [The evolution of pine plantation silviculture in the southern United States](#). (2004).
29. Dutch Biomass Certification Foundation, "A scoping study for the DBC Foundation - Defining the bottlenecks, drivers, intervention options and conditions for stimulating SFM certification of small forest owners in Northern America" (2016) – CONFIDENTIAL REPORT

## Annex I – Biomass categories and the CoC system

The sustainability and management criteria in paragraphs 4.2 and 4.3 are a translation from the criteria in Annexes B and C of the Dutch regulation on conformity assessment of solid biomass for energy production . In Annex D of this regulation two tables show which requirements apply to the five categories and the set-up of the chain of custody. In the explanatory notes to the legislation a table can be found with additional guidance to the requirements.

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

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

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

<b>Sustainability requirements</b> <b>Category</b>	Greenhouse gas emission	Soil management	Carbon and land use change	Sustainable forest management	Chain of custody
1. Woody biomass from forest management units	1.1		3.1-3.3, 4.1-4.3, 5.1	6.1-6.3, 7.1-7.5, 8.1-8.8, 9.1-9.2, 10.1-10.5, 11.1-11.2	12.1-12.6, 13.1-13.3
2. Woody biomass from forest management units less than 500 ha	1.1		3.1-3.3, 4.1-4.3	6.1-6.3, 7.1-7.5, 8.1-8.8, 9.1-9.2, 10.1-10.5, 11.1-11.2	12.1-12.6, 13.1-13.3
3. Residues from nature and landscape management	1.1	2.1			12.1-12.6, 13.1-13.3
4. Agricultural residues	1.1	2.1			12.1-12.6, 13.1-13.3
5. Biogenic residues and waste	1.1				12.1-12.6, 13.1-13.3

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

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

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

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

## Annex II – Abbreviations

ADBE	Advisory commission Sustainability Biomass for Energy applications
AFF	American Forest Foundation
ATFS	American Tree Farm System
BMPs	Best Management Practices
BOD	Board of Directors
c.o.	covered otherwise
CoC	Chain-of-Custody
EPA	Environmental Protection Agency
ESA	Endangered Species Act
EU	European Union
EZK	“Ministry of EZK” is the Dutch Minister of Economic Affairs and Climate Policy
FIFRA	Federal Insecticide, Fungicide and Rodenticide Act
FMU	Forest Management Unit
FORI	Forests of recognized importance
GHG	GreenHouse Gas
HCV	High Conservation Value
ILUC	Indirect Land Use Change
ISRP	Independent Standards Review Panel
IUCN	International Union for Conservation of Nature
n.a.	not applicable
NFTPs	Non-Timber Forest Products
PEFC	Programme for the Endorsement of Forest Certification
SDE+	A Dutch subsidy scheme (feed-in tariff) for production of renewable energy
SFI	Sustainable Forestry Initiative
SFM	Sustainable Forest Management