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Sustainability Standards for Bioenergy

- final draft -

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Study commissioned by

WWF Germany

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Note on this Study

The World Wide Fund for Nature (WWF), Germany commissioned a brief study from the Öko-Institut (Institute for Applied Ecology) to provide an overview of key ecological and social impacts of bioenergy, and to develop a *core set of standards* which could ensure the sustainability of bioenergy supply.

The scientific work was to be based on existing studies, other research results, and information already available within Öko-Institut.

This draft final report summarizes the key findings of this work.

We would like to thank WWF for sponsoring this study, and all contributors – especially those participating in the discussions of an early draft of this study within the informal "Biomass Round Table" organized by WWF Germany from Spring to Summer 2006 in Berlin – for valuable comments, critique, and hints.

All responsibility for its contents remains with the authors.

Darmstadt, September 2006 The Authors

1 Introduction

Since more than hundred thousands of years, biomass is used by humans as a source for food, fodder, fiber, building materials, and energy. Biomass is the totality of plants in the terrestrial and marine biosphere which converts CO_2, water and solar energy to provide a plenty of organic materials, and also includes the animals which feed upon plants (and other animals), as well as a variety of destruents – including bacteria and funghi – which return plants and animals and their organic wastes into CO_2. All this takes place in a complex web of organic materials, soil and plant matter, marine flows, cycling of nutrients and detritus, and much more. In short, we call that *life*.

Biomass can be read as "the stuff of life", i.e., everything living beings are made of, and including organic material resulting from their deaths[1].

Terrestrial biomass, i.e., anything that lives on land, is dominating the use pattern of human interaction with plants and animals, from agriculture to hunting and forestry, while the *marine* biomass (living beings in the oceans) is currently used mainly in term of fishing, and (some) harvesting of algae.

The major share of today's human "appropriation" of terrestrial biomass is dedicated to the provision of food, fodder, and fiber – currently, only some 10 percent of the biomass is *directly* used for energy purposes, but *residues* from agriculture and forestry and their downstream processing find their way into cooking stoves, furnaces, and powerplants. Marine biomass is – so far – not used for energy at all[2].

One has to keep these figures in mind when considering the sustainability of bioenergy:

First and foremost, the pressure on land, biodiversity, soil etc. results from *non-energy* biomass supply, i.e. (non-sustainable) agriculture, and (again non-sustainable) forestry[3].

Today, all forms of *bioenergy* (biomass used for energy, including biofuels) supply some 10 percent of the world primary energy demand, representing about 90 percent of the global contribution of *all* renewable energies (REN21 2006).

While bioenergy's share *de*creased in OECD energy supply over the last decades[4], biomass is an important energy source in developing countries[5], as shown in the following table.

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1 Biomass is also the main source of deposits we call fossil fuels – coal, natural gas, and crude oil.

2 For a discussion of "aquatic" biomass, focusing on marine resources and their role for feedstock provision and potential for energy conversion, see Richter (2006).

3 It should be noted that about half of the global forestry products are for firewood, though (FAO 2000). Furthermore, bioenergy supply could *grow far more rapid* than traditional agriculture, or forestry – especially if fossil energy prices remain high or rise further, and revenues for agricultural and forest products continue to decrease.

4 There are some exceptions to this trend, e.g., Austria, Denmark, Finland, and Sweden. Also in Germany, drastically higher shares of bioenergy are expected in the future (Fritsche et al. 2004).

Table 1 Primary Energy Demand, Renewables and Biomass in Selected Regions (Year 2000)

data in EJ/a	**total primary energy**	**total renewables**	**total biomass**	**biomass share of primary energy**
Africa	21.5	10.8	10.5	49%
Latin America	18.8	5.3	3.3	18%
Asia w/o China	48.2	16.1	15.0	31%
China	48.4	10.0	9.0	19%
Middle East	16.3	0.1	0.0	0%
CIS + Central Europe	43.7	1.7	0.6	1%
OECD	223.3	12.7	6.8	3%
World	**420.3**	**56.7**	**45.2**	**11%**

Source: OEKO (2005)

The major share of today's bioenergy use is supplied by *organic wastes*, and - in a few but relevant regions – from unsustainable use of forests, and bushland, respectively.

Given the rise in oil prices, the concern on global climate change and the relatively low commodity prices for agricultural and forestry mass products, there is no questioning that bioenergy supply and use will rise accordingly.

1.1 Global Potential of Bioenergy

Various studies on the global bioenergy potential give a corridor a few hundred to more than 1,000 EJ – depending on assumptions for agriculture, yields, population, etc. (Fallot et al. 2006, Hoogwijk 2004).

The following table gives the potential supply of sustainable energy crops[6] for different regions based on WBGU (2003) – this estimate used "ecological guardrails".

5 In developing countries, some 35% of primary energy comes from biomass (on average); in some African countries, even up to 90%. The energy supply of approx. 2 billion people depends nearly exclusively on biomass where "traditional" bioenergy (wood, manure) still plays an important role for cooking (Karekezi 2004).

6 The specific yields used by WBGU are conservative when the "energy-only" cultivation schemes for biomass are taken into account for which in the near future, net yields of 200-400 GJ/ha appear possible within ecological constraints. Therefore, a cautious estimate of globally sustainable potentials of energy crops is about 100 EJ/a.

Table 2 WBGU Potentials for Energy Crops by Continent

	potential land		WBGU-„guard rail“		
Region	**[10^6 ha]**	**[%]**	**[10^6 ha]**	**[%]**	**[EJ/a]**
Europe	22	4.5	22	4.5	2.5
Asia + Australia	37	0.7	26	0.5	3
Africa	111	3.8	111	3.8	12.7
Latin America	323	16	165	8	18.8
North America	101	5.9	67	3.6	7.7
World	**595**	**4.6**	**391**	**3**	**44.7**

Source: WBGU (2003)

Clearly, the tropical regions in Latin America and Africa could be a “green eldorado” for bioenergy, as they are already for traditional agricultural products. But also other regions of the world could grow substantial amounts of bioenergy, in addition to the potentials of bioenergy from residues and wastes.

The following table indicates the potential contribution of relevant biomass types to the global energy supply in the year 2050. In the most optimistic scenarios, bioenergy could provide for more than two times the current global energy demand, without competing with food production, forest protection efforts, and biodiversity. In the least favorable scenarios however, bioenergy could supply only a fraction of current energy use, perhaps even less than it provides today.

Table 3 Bioenergy Production Potentials for Selected Biomass Types in 2050

	Potential (EJ)	**Main Assumptions and Remarks**
Agricultural Residues	15–70	Based on estimates from various studies. Potential depends on yield/product ratios, total agricultural land area, type of production system. Extensive production systems require leaving of residues to maintain soil fertility; intensive systems allow for higher rates of residue energy use.
Organic Wastes	5–50	Based on estimates from various studies. Includes the organic fraction of MSW and waste wood. Strongly dependent on economic development and consumption, and as well as use for biomaterials. Higher values possible by more intensive biomaterials use.
Dung	5–55	Use of dried dung. Low range value based on current global use; high value reflects technical potential. Utilization (collection) over longer term is uncertain.
Forest Residues	30–150	Figures include processing residues. Part is natural forest (reserves). The (sustainable) energy potential of world forests is unclear. Low range value based on sustainable forest management; high value reflects technical potential.
Energy Crops (cur-	0–700 (100–300)	Potential land availability of 0–4 Gigahectares (Gha), though 1–2 is more average. Based on productivity of 8–12 dry tonne/ha/yr (higher yields are

	Potential (EJ)	Main Assumptions and Remarks
rent agricultural land)		likely with better soil quality). If adaptation of intensive agricultural production systems is not feasible, bioenergy supply could be zero.
Energy Crops (marginal land)	60–150	Potential maximum land area of 1.7 Gha Low productivity is 2–5 dry tonne/ha/yr Bioenergy supply could be low or zero due to poor economics or competition with food production.
Total	**40–1,100 (250 –500)**	Pessimistic scenario assumes no land for energy farming, only use of residues; optimistic scenario assumes intensive agriculture on better quality soils. ( ) = most realistic in a world aiming for large-scale bioenergy use.

Source: adjusted from WWI/gtz (2006)

Given this huge range of potentials for bioenergy, there is an *opportunity to shape* the future biomass development, especially towards sustainable supply practices.

On the other hand, there is a considerable risk of unsustainable bioenergy development, as the global rise of the so-called "green revolution" in agriculture has shown in the mid-1960ies and 1970ies where industrialized high-input cash crops like oil palm, soy beans, and sugarcane spread rapidly and massively around the globe.

1.2 Sustainability Issues of Bioenergy Development

With this background, serious concerns have been raised about the sustainability of future bioenergy development, both for residues, and dedicated energy crops[7].

Although sustainability tries to link economic, environmental, and social issues, this study focuses on environment and social problems, as the economics of bioenergy are an issue of market players, and governmental support[8].

This study briefly identifies relevant environmental and social problems of bioenergy development from a global perspective, while including some details from selected regions. From that, the study continues to suggest a "core" list of standards and criteria for the environmental and socio-economic sustainability of bioenergy[9].

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7 See for example Cameron (2006), EEB/BLI/T&E (2006), and Neuhaus (2006), as well as the global considerations in WWI/gtz (2006).

8 As it is hard to clearly distinguish economic and social issues, some more "macro" economic concerns are included in the social dimensions (see Sections 2.3, and 3.3, respectively).

9 The study does *not* deal with the sustainability of "traditional" biomass (e.g., small-scale use of wood for cooking), and bio-based materials (agricultural commodities, timber, paper, fibers…), even if those are dominating current global biomass use.

It must be emphasized also that bioenergy offers significant opportunities *to improve* sustainable development, especially in smaller-scale rural areas, and that bioenergy could in comparison to fossil fuels *drastically reduce* greenhouse-gas emissions if managed adequately.

It should be noted, though, that research on sustainable bioenergy systems is a very recent issue, so that only few studies and even less empirical, field-derived data is available so far. This is even more true for sustainability issues of bioenergy in developing – mostly Southern – countries where semi-arid and arid as well as tropical climates restrict the application of results from "Northern" countries which have different soils, climates, and use different cropping systems[10].

1.3 Standards and Certification Schemes

The concept of sustainability standards is often related to voluntary schemes like product labeling and certification, but in fact it is useful (and already applied) for legally binding regulation, and for (governmental) support schemes (e.g., subsidies or preferential treatment of some products). This study therefore analyses briefly the full bandwidth of sustainability standards, while drawing substantially from existing labeling and certification schemes for bio-based products.

1.4 Brief Overview of this Report

After the introductory section, this report starts in Section 2 with a brief description of potential problems, and conflict areas arising from increased supply of bioenergy. For this, a distinction is made between the use of biogenic residues/wastes, and the dedicated cultivation of bioenergy crops. The study focuses on the latter, though.

In Section 3, a *core list* of sustainability standards is presented which was derived from a broad review of existing labeling and certification schemes for bio-based products, and earlier work of the authors.

In Section 4, the *legal* background for implementing sustainability standards is discussed, and various schemes for such standards are summarized.

Section 5 gives *conclusions and recommendations* from the previous sections, especially for policy regulations which offer possibilities to at least starting to introduce sustainability standards for bioenergy. Furthermore, some open questions are addressed.

The report closes with a reference section, a list of acronyms, and an Appendix which offers synopses with details on sustainability standards for biomass.

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10 A notable exception is the Expert Workshop on Sustainable Bioenergy Cropping Systems for the Mediterranean which focused on semi-dry and dry climates (JRC/EEA 2006).

2 Key Environmental and Socio-Economic Concerns from Bioenergy Production

This section offers a generic[11] description of potential problems, and conflict areas arising from increased bioenergy use, differentiated for residues/wastes, and dedicated cultivation of bioenergy crops. The study focuses on the latter.

2.1 Land Use

One of the central conflict areas in cultivating bioenergy crops is its land use which varies depending on crops species, cultivation methods, and soil and climatic conditions (EEA 2006, Elbersen et al. 2005, Fritsche et al. 2004, OEKO/Alterra 2006). Depending on its spatial distribution and cultivation practices, increased bioenergy cropping *could* result in loss of habitats and extinction or endangering of rare species, obstruction of migration patterns and corridors, and degradation of soils, and water bodies.

But in terms of quantity, land use for *non-energy purposes* is – in all probability - more important in the next decades:

An *increase* in agricultural land use is to be expected in the developing world, due to population growth, changes in diet, increasing export options for food and fodder, as well as degradation and salination of currently cultivated land, limits of irrigation, and ongoing desertification (FAO 2003, WBGU 2004). Still, modern farming practices, improved breeding, and pest management could well *counterbalance* these trends. At the same time, demand for wood products (timber, paper etc.) will increase worldwide (FAO 2000), in parallel to economic development which will also cause additional pressure on land from settlements, and transport infrastructure. Increases in bioenergy cropping must be seen in that context – it is *one* of several pressures for increased land-use.

Furthermore, land requirements for bioenergy cropping compete with other land uses *only if fertile land* is considered, but there is (unfortunately) a globally growing share of *degraded* land which in principle could be used for bioenergy cropping systems. Even assuming low yields, this represents a potential of 25% of global primary energy use[12].

To minimize land-use conflicts, a *priority* for sustainable bioenergy should be seen in the development of economically viable and environmentally sound options to make use of such lands, and to take into account the social implications as well[13].

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11 Some disaggregated review of key concerns is given for Germany and the EU, other industrialized countries (esp. USA), and selected developing countries (Brazil, China, India, Indonesia, Tanzania).

12 Estimates of the global potential for biomass plantations on degraded land are in the order of *1 billion hectares*, i.e., 1,000 million hectares (Lal 2006), representing a minimum bioenergy potential of some 100 EJ/year.

13 Encouraging evidence that such a strategy *is* possible comes from India where rural projects are concerned with the production of biofuels from Jatropha, a perennial, nitrogen-fixing plant which grows on poor soils, and requires only little irrigation to establish the plant (TERI 2005). The Brazilian “Social Biodiesel” program aims at similar goals, but uses castor, and oil palm (Kaltner et al. 2005).

Spotlight: Biofuel development in Brazil

The supply of sugarcane in Brazil is mainly based on monocropping in large farms (up to 100,000 ha), intensive use of machines, and agrochemicals. Due to restrictive environmental legislation in the 1990ies, the burning of the crop before harvest has been prohibited in the State of Sao Paulo, which accounts for the major share of Brasil's sugarcane production. The resulting mechanization of the harvest process, which is only possible with crops grown on slopes less than 12%, and on farms larger than 500 ha. The end of the pre-harvest burning gives significant environmental benefits, such as the elimination air emissions, and the reduced risks of forest fires (Pinto et al. 2001).

Sugarcane crop has expanded to more degraded or poor areas, mainly ex-extensive pastures. It contributes to soil recovery, adding organic matter chemical-organic fertilization, contributing to improve its physic-chemical conditioning and incorporating soils to the Brazilian agricultural area,

Sugarcane in Brazil is recognized today for having relatively small soil loss by erosion. This situation is even improving with the progressive increase of the harvest without straw burning and with techniques of reduced soil preparation, leading to very low values or losses, comparable to those obtained with direct plantation in annual crops.

Sugarcane is not irrigated in Brazil so there are low risks of environmental problems with water quality due to irrigation, such as nutrients inflow, and erosion.

Since sugarcane is being cultivated on degraded or poor areas, and mainly on "recycled" extensive pasture but not on new uncultivated land, the problem with biodiversity loss is not significant. This can only take place if due to extreme demand, expansion would shift to the cerrado or forest, but that is unlikely for the foreseeable future.

The prospects of expanding the biofuel global market could eventually be limited by constraints relative to resources and costs. To cover some of the external demand, the country exported two billion litres in 2005, making it the world's largest exporter. To keep pace with the demand, ethanol production would have to increase by 2010, putting pressure on land and on transport infrastructures (Neuhaus, 2006).

In Brazil, the past experience with the Proalcool program in the eighties has showed that a rapid expansion in the scale of production for energy sources can lead to devastation of ecosystems. Potential risks with biomass energy resources also include deforestation and the degradation of other conservation lands. Monocrop cultivation may result in loss of biodiversity, soil fertility and land degradation. Excessive use of fertilizers and pesticides is responsible for the pollution of land and water resources. There is also a risk of competition for land between food production and biomass resources. Bioenergy is not necessary carbon- neutral, and frequently additional energy requirements are necessary for crop cultivation and fuel transportation. In addition, increasing international trade in bioenergy and biomass will create further competitive pressure for unsustainable production.

But since, according to Kaltner et al. (2005), improvement in legislations and environmental enforcement and thanks to significant expertises developed in better Land Use management, the problems faced in the early day of Proalcool, has been minimized.

It is also necessary to mention that the expansion of agriculture in the last 40 years has occurred mostly in degraded areas of pasture and "dirty fields", and not in areas of forest. The expansion of sugarcane plantations into areas of *Cerrados* was relatively small (Kaltner et al. 2005).

So it could be assumed that for the near future, the increase of sugarcane plantations, driven by increasing demand in biofuels, would rather occur with the replacement of other cultures and pastures or recycling degraded areas than in new created areas.

2.2 Food and Extensification versus Biofuel Supply

A second potential conflict area is often seen in the competition between land use for food production, and land use for bioenergy production. This complex is tightly linked to the overall land-use issues, but has a special quality insofar as *food security* is concerned. Still, available analysis of this issue clearly indicates that in general, bioenergy cropping is *not* a cause of hunger, nor a direct driver of food insecurity. Quite contrariwise, bioenergy crops could well be a means to *alleviate* poverty, and to *increase* food security through income generation (FAO 2006). The food production world-wide is balanced, i.e., enough food of sufficient quality is available, but there is an unequal access to food within developing countries (WBGU 2004). Food security is not a problem of production, but a problem of *distribution.*

But related to the land ownership issue (see below), a switch to large-scale bioenergy crop production might have locally adverse impact as well.

Furthermore, organic agriculture requires a larger amount of land than intensive, industrialized farming. Given that the share of organic farming is to grow in industrialized countries, more land will be needed to feed people, and to provide organically-grown fodder for animal products like meat, milk, and dairy products. In analyses of the sustainable bioenergy potentials for Germany, and the EU, up to 30 percent of agricultural production was assumed to come from organic or "environmentally oriented" farming, thus reducing the land potential for bioenergy crops (Fritsche et al. 2004; EEA 2006).

In developing countries where agriculture is currently quite extensive, there is hardly any difference in the yields of organic and conventional farming. Organic farming is even able to raise yields over time due to less yield variations[14].As regards the increased use of biogenic *residues and wastes* as an energy resource, there is an *indirect* competition to food supply mainly in poor areas of developing countries where these materials are used as inexpensive fertilizers, soil conditioners, or fodder.

[14] see FAO (2002), and http://geb.uni-giessen.de/geb/volltexte/2003/1283/

Spotlight: The Case of Soy Expansion in South America

"More than rainforests, the bush savannah biomes of South America are threatened by soy expansion. Unlike forests, savannahs can be converted directly to soy plantations, and millions of hectares of Argentine Chaco and Brazilian Cerrado have been converted to soy plantations in the past decade" (AIDE 2004).

The expected expansion of soy is mainly caused by exports to Europe, and other industrialized countries where it is currently used as animal feed. In the future, though, soy oil could be extracted, and processed into biodiesel as well[15].

The soy production in the Brazilian Cerrado is large-scale and well mechanized. Only 4% of the farms are larger than 1000 ha, but they cover as much as 60% of the cultivated area. When land is cleared for cultivation, charcoal producers remove the trees. The rest of the vegetation is gathered into piles by tractors or bulldozers and burned. After clearing, the soil is ploughed and prepared for sowing. Soybean crop is sown in October or November when the rain sets in; it is harvested in April or May (FAO 1994). Soybeans are grown in rotation with maize and winter wheat, but also as monoculture. Due to problems with erosion, reduced tillage operations are being used more frequently. These methods, however, increase the need for herbicide treatment.

In Brazil, soybean production has expanded rapidly in recent decades; sometimes the land is used for only a short period of time, after which new areas are exploited (FBOMS 2004).

Soybean cultivation in the Cerrado causes 8 tonnes per ha and year of soil loss (Kaltner et al. 2005). Loss of soil organic matter is a serious problem in the soybean production areas of Brazil due to warm climate, dry winters, quick decomposition of crop residues, etc. (Herzog 2004). The heavy use of fertilizers and pesticides has lead to groundwater contamination (Clay 2004)

The loss of habitat is the most serious threat to the biodiversity in the Cerrado area. Although the Cerrado is very rich in biodiversity, only 1.5% of this land is protected today. The expansion of soybean cultivation is a threat to the biodiversity in the Cerrado area (Kaltner et al. 2005).

15 Brazil's Petrobras announced recently the development of „H-Bio " which is a mixture of biodiesel made from soy and palm oil, and fossil diesel.

2.3 Energy Supply

Energy is one key element to reduce poverty and hunger. Achieving the UN Millennium Development Goals imply access to modern forms of energy, especially electricity, and "modern" biofuels. Bioenergy can help to diversify agriculture and improve food security, and to contribute to sustainable development (FAO 2006). Energy supply safety in the region of biomass production should not suffer from biomass trading activities (Lewandowski/Faaij 2004)

2.4 Land Ownership

Besides questions of land use, there is the fundamental issue of land ownership structures, i.e. of property to be used for bioenergy crop cultivation. If an industrialized form of bioenergy crop cultivation takes place, then the land required will most probably be controlled by large land owners, or (trans)national companies.

This might conflict with the right to democratically regulate land access, and the implementation of human rights guaranteeing sufficient food. Depending upon the social situation and historical developments, the requirements of industrial-style cultivation of bioenergy crops could come into conflict with the requirements of diversified agriculture driven by family businesses, cooperatives, and rural communities aiming at supplying food and income for the local population. Similarly, conflicts between small and large land owners could arise, as large.

Landownership should be equitable, and land-tenure conflicts should be avoided. Through clearly defined, documented and legally established tenure use rights, conflicts can be avoided. To avoid leakage effects poor people should not exclude from the land. A well-being community guaranteed economic and social development.

2.5 Loss of Biodiversity

Besides the loss of habitats, migration corridors and buffer zones (areas adjacent to protected areas) due to land use changes (2.1), conflicts between biodiversity and bioenergy crop cultivation are also possible, depending upon cultivation form[16] and harvest procedure.

These conflicts can be minimized by more extensive forms of cultivation[17], mixing of the crop varieties and rotation schemes, and small-scale structuring of the cultivation. Furthermore, the implementation of ecological "stepping-stones" (small-scale, distributed biotopes) and migration corridors into the cropping areas could alleviate negative impacts.

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16 Depending e.g., on crop varieties, rotation schemes, pest management, fertilizer use, irrigation, field size.

17 However, this would have the negative effect of increased land requirements (in case of industrialized agriculture).

Of special concern are the conversion of extensive, "high-nature value" farming to more intensive mono-cropping, and the conversion of primary forests[18] and other habitats to energy plantations - both would clearly lead to a severe loss of biodiversity.

According the Convention of Biological Diversity (CBD)[19] ecosystems and habitats containing high diversity, large numbers of endemic or threatened species, or wilderness, required by migratory species, of social, economic, cultural or scientific importance and which are representative, unique or associated with key evolutionary or other biological processes should be endeavored for protection.

On the level of species and communities, there is special interest on threatened, wild relatives of domesticated or cultivated species, of medicinal, agricultural or other economic value or social, scientific or cultural importance, importance for research into the conservation and sustainable use of biological diversity, such as indicator species and described genomes and genes of social, scientific or economic importance. The IUCN Red List is to catalogue and highlight threatened species (listed as Critically Endangered, Endangered and Vulnerable). Its information can be used to provide information on the conservation status of individual species.

It has to be considered that the information based on an assessment of only a small part of the world's described species, but amphibians, birds, mammals, conifers and cycads have been comprehensively assessed. Another database to find out the conservation status of plants is the UNEP-WCMC Threatened Plants database.

Furthermore, it has been suggested to use the "human appropriation of net primary production (HANPP) as an aggregated indicator for the loss of biodiversity (Haberl et al. 2005). In that respect, perennial bioenergy crops might be less damaging to biodiversity than intensely managed annual cropping system (Haberl/Erb 2006).

Spotlight: Palm oil production in Malaysia

The world's largest producer of palm oil is Malaysia, where over the last decades, production has grown rapidly by 4 percent[20]. Malaysian oil palm is grown mainly in peninsular Malaysia. In this region, almost all land suitable for oil palm plantation has been cleared and planted since the 1960ies. Palm oil is an attractive candidate for biodiesel production because it yields a high level of oil per hectare. While most palm oil is used for food purposes, the demand for palm biodiesel is expected to increase rapidly, particularly in Europe.

18 A primary forest is a forest that has never been logged and has developed following natural disturbances and under natural processes, regardless of its age (definition from the Convention on Biological Diversity)

19 http://www.biodiv.org/convention/default.shtml

20 The expansion of oil palm plantations during the last 35 years was due to the introduction of synthetic rubber. This led to a shift from rubber trees to oil palms; also government grants encouraged poor farmers to start oil palm plantations in the tropical rain forest

The land use regime supplying palm oil is plantations that have been set up after clearing large areas of tropical forest. Those plantations evolve from small size groves to large estate, often larger than 1000 ha. The total area of oil palm cultivation today is close to 3 million ha, corresponding to 8.4% of Malaysia's total land area.

An oil palm plantation continues to yield for 25–30 years and the palm trees can be harvested after 3 years, harvest is possible all-year round. Herbicides are used yearly in the plantations; insecticides, however, are used mainly in the nursery before the oil palm seedlings are transplanted (Herzog 2004).

The main environmental problems from oil palm are habitat conversion, threats to critical habitats of endangered species, use of poisons to control rats and water pollution from processing wastes

In Malaysia, oil palm plantations are also expanding, often at the sacrifice of rain forest. Land transformation from rain forest to oil palm plantations means that the number of mammals is reduced from 75 to 10 species per hectare.

For oil palm plantations there is a risk of losing soil organic matter during the establishment period; later, however, the plantations seem to redeem their soil organic matter content. Yet, erosion has been accentuated by planting trees in row up and down hillsides rather than on contours around them, and by establishing plantations and infrastructure on slopes of more than 15 degrees (Herzog 2004).

Run-off from palm oil mill effluents into rivers is creating problems for the aquatic ecosystems (Kittikun et al. 2000).

The establishment of oil plantations in Malaysia is considered to be the major cause of the air pollution that affected many neighboring counties in Southeast Asia (Clay 2004).

2.6 Greenhouse-Gas Emissions

Although bioenergy is usually meant to be a mean to reduce greenhouse-gas (GHG) emissions, there is a clear conflict if forested, pasture or savannah-type land is converted to (annual) bioenergy crops cultivation. This could cause *larger* GHG emissions from released soil carbon and cleared biomass than fixed via the cultivation of energy crops. This leads to a change in carbon stocks.

Furthermore, nitrous oxide emissions from both fertilizer application, and production could partially offset the CO_2 neutrality of even perennial crop plantations.

Also, fossil energy inputs into bioenergy production and downstream processing could reduce net GHG savings from bioenergy, especially if coal is used for processing energy (e.g., in first-generation ethanol production).

Finally, the overall balance of GHG emissions from bioenergy supply depend on the effective use of *by-products* from bioenergy conversion, (e.g., oil cake, glycerin, bagasse) which could offset at least some of the GHG burden from bioenergy cultivation, and processing. As markets for by-products depend on quantity and develop over time, GHG benefits from by-product utilization can vary significantly.

The current knowledge of GHG balances of biofuels indicates a rather large range (Larson 2006), but for specified regions like the EU, quantification is already possible with regard to the different bioenergy crops, conversion routes, and by-product utilization rates (OEKO 2006). For other regions like the USA, and a few developing countries (Brazil, China, India), some data on the life-cycle GHG balances exists as well, and countries like Thailand have ongoing research in that area[21]. Therefore, on can expect to establish credible ranges of GHG balances for bioenergy in the near future, if adequate funding is available and data from real-world projects is used[22].

2.7 Soil Erosion and Other Soil Degradation

The increase of *annual* bioenergy crops could further lead to soil erosion, and overuse of irrigation, agrochemicals, and heavy harvesting equipment might degrade fertile soils[23]. Soil erosion is especially a problem in regions with long dry periods with limited soil cover followed by heavy bursts of rainfall falling on steep slopes with instable soils. Beside water erosion, there is also erosion caused by wind. This is a problem in more open, flat or undulating terrain with sandy soils where soil cover is limited over the year and wind-braking landscape elements are missing. Wind erosion can especially be a problem in the flatter zones with intensive agriculture. Soil erosion and degradation are increased due to field enlargement and inappropriate machinery use (EEA 2005).

In contrast to this, *perennial* bioenergy crops could improve soils, and help to reduce erosion on currently used arable land by creating a year-round soil coverage. Perennial biomass crops are particularly efficient in soil coverage, especially after their establishment period of one or 2 years. (EEA 2006, Elbersen et al. 2005).

As regards agricultural and forestry *residues* (e.g., straw, wood thinnings), their use as energy carriers or feedstock for biofuel conversion could *reduce* humus creation and soil carbon, and increase plant nutrient exports which would then have to be compensated.

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21 see Bauen et al. (2006) for a general methodology, and WWI/gtz (2006) and Hill (2006) for a review of LCA data for the USA, and the GTZ country studies for Brazil (Kaltner et al. 2005), China (Gehua et al. 2006), India (TERI 2005), and Tanzania (Janssen et al. 2005).

22 In that context it should be noted that the UNFCCC's CDM Methodology Panel („MethPanel") has approved only very few CDM methodologies for biofuels due to open issues in determining the „leakage", i.e., GHG emissions from "upstream" activities outside of the CDM project boundaries. It should be considered to include the MethPanel in the further developments of a GHG accounting methodology (and database) for bioenergy crops.

23 On the other hand, adequate bioenergy cropping systems could be operated on degraded land (see Footnote 12), thereby increasing soil carbon, and helping to restore such land for sustainable use.

2.8 Water Use and Water Contamination

Agricultural water use is a serious concern especially in arid and semi-arid regions, where water is scarce and highly variable throughout the year. An increase in irrigated land could lead to water scarcity, to the lowering of water tables as well as reduced water levels in rivers and lakes. Potential effects of increased water abstraction are salination, loss of wetlands, and disappearance of habitats through inundation caused by dams and reservoirs. In general there has been an important increase in competition for water between agriculture, urban land uses and nature in more arid parts in the world in the past (JRC/EEA 2006).

Besides potential conflicts on the availability of water for irrigation, other impacts on ground and surface water supplies could arise from agrochemicals (fertilizers, pesticides) applied during cultivation. Current conversion technologies especially for biofuels offer effective options to control water pollution, but existing facilities to process e.g. palm oil could cause significant discharges of organically contaminated waste water (Kittikun et al. 2000).

2.9 Human Health Impacts

The cultivation of bioenergy crops could cause not only land use conflicts, but also direct impacts regarding human health, depending on the type of crop being cultivated, and the harvesting procedures.

Unnecessarily substances or risk of injuries impact human health and safety. Pesticides are the primary cause of health risks for agricultural workers. Especially with the cultivation of sugar cane and palm oil, air pollutants caused by field burning could cause adverse health effects.

Workers are not educated about the health risk of using pesticides. Application of pesticides by airplane leads to driftings of pesticides into the dales and damages the crops and the animals of peasants (Bickel/Dros 2003). Harvesting is a dangerous work caused by the use of sharp tools, cutting and planting green cane causes skin irritations. Burned cane can also cause skin irritation. Smoke and polluted environment endangers health. Control of the plantation and the upcoming weed has a negative impact for health through residues of toxins. Medical care is often not available on the plantations. Furthermore aspects impact human health like exposition to the sun, insects and snakes and uncomfortable positions during work (Zamora et al. 2004).

A safe and healthy work environment comprised aspects like machine and body protection, sufficient lighting, fire drills. Periodic training of all workers to perform their tasks according to the work requirements on health protection is useful (Lewandowski/Faaij 2004).

2.10 Labor Conditions and Rights of Children

Labor conditions comprise aspects like wages, illegal overtime, children work or slavery. In the following, some problematic aspects of biomass farming are described. Workers on plantations have increased in relation to the number of permanent workers, who are exposed to greater risks. Women often help their husbands: Neither they do enter a contract with the company nor do they receive a remuneration. Domestic estate companies do not provide working tools and safety equipment to the workers. Permanent workers in foreign estates working tools are supplied with working tools; there is no safety training for workers in foreign companies. Some migrant workers have to pay for recruiting agencies and to sign contracts which are often in a foreign language. In many cases migrants sign whatever they are offered from the companies.

The duration of a working day is often about 12 or 14 hours with a high pressure on production quotas.

As regards labor conditions it is important to protect workers against forced labor, unequal paying and illegal overtime. Minimum wages, rights of pregnant woman, elimination of child labor should include in a social view on biomass production. Often children and women work on the field. Especially for them it is necessary to reword standards for sustainable and also social biomass farming.

3 Core Sustainability Standards for Bioenergy

In order to design a *core set* of sustainability standards, this brief study draws from other work on the sustainability of energy systems, especially those utilizing bioenergy. This section focuses on annual and perennial energy crops, and will also address biogenic residues and wastes (e.g. agricultural and forest residues) where appropriate.

Preventing environmental degradation and socio-economic disruption from activities associated with bioenergy supply are seen as the *basic criteria* for sustainability. In the longer-term, a process-oriented development of more refined criteria and standards involving relevant stakeholders is needed (see Section 5).

3.1 Core Environmental Standards

Measuring compliance with standards needs criteria which depend on measurable indicators. Indicators are measurable parameters which give quantitative or qualitative information about the sustainability of a resource, its processing, and its utilization.

The standards derived here are based on an evaluation of various studies[24], and the following Standards and Certification Schemes:

- American Tree Farm System
- European Green Electricity Network (EUGENE)[25].
- EUREPGAP Protocol for Fresh Fruit and Vegetables
- Fairtrade Labelling Organisations International FLO
- Flower Label Programme (FLP)
- Forest Stewardship Council (FSC)
- Green Gold Label Program
- Impact Basel Criteria for Responsible Soy Production
- RSPO Principles and Criteria for Sustainable Palm Oil Production
- Sustainable Agricultural Standards
- Sustainable Forestry Initiative Standard (SFIS) 2005–2009 Standard
- Utz Kapeh - Codes of Conduct

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24 AIDE (2006), Fritsche et al. (2004), LowCVP (2006), Lewandowski/Faaij (2004), OEKO/Alterra (2006)

25 The EUGENE standards were analyzed within the EU-sponsored CLEAN-E project coordinated by Öko-Institut which also covered the following labels for bioenergy: Ecolabel Austria, Bra Miljöval Sweden, and naturemade star Switzerland, Green Power Australia, Green-e USA, and Environmental Choice Canada Ecoenergia Finland, Gruener Strom Label and OK power Germany, Milieukeur – Netherlands, naturemade (see Annex 4).

A synopsis of citations of key sections from those sources can be found in Annex 2. For internet access to documents describing these initiatives and organizations, see Annex 5.

Furthermore, the discussion within the informal group "Biomass Round Table" (organized by WWF Germany during Spring and Summer 2006 in Berlin) brought valuable suggestions, insight, and comments to this brief study.

The environmental standards for bioenergy presented in the following sub-sections address the protection of biodiversity, soil, and water, and the reduction of greenhouse-gas emissions[26]. Furthermore, a mechanism to safeguard against indirect impacts from land-use changes is suggested.

The overall concept of the sustainability standards developed here is that of *cumulative compliance*, i.e. sustainable bioenergy developments must meet *all* of the core standards simultaneously. If a project fails to comply with any one of the core standards, it should be considered unsustainable.

Furthermore, the standards developed here have an *impact focus*, i.e. they are expressed with respect to the area of concern only. As a consequence, cross-impact effects of standards are not explicitly addressed, e.g. those of the agrochemicals standards listed under "water protection" have also a protective impact also on biodiversity and soil.

In Section 3.2, an additional aspect is discussed: Beyond land-use related impacts and operational issues like GHG emissions, agrochemical application and irrigation, the *choice of bioenergy cropping systems* also determines impacts on biodiversity, soil, etc.

Therefore, a relative ranking of the various cropping systems should be carried out in order to favor such schemes which have low environmental risks, and to de-favor those where risks are relatively high. This relative ranking aims at prioritizing bioenergy crop production schemes (several crops) within a given region.

So, the relative ranking is a step in addition to the compliance with the core standards suggested here. Details concerning method can be found in annex A-1.

26 It should be noted that adequately selected and managed bioenergy cultivation could also *positively* affect (i.e. enhance) soil quality, habitats, and biodiversity of current arable land, and modern biomass use could help to reduce air pollution e.g. from coal, or heavy fuel oil.

3.1.1 No Negative Land Use Changes from Biomass Production

Since land use changes might directly result in biodiversity impacts, greenhouse-gas emissions as well as in degradation of soils and water bodies, a key issue for any sustainability standard is to avoid negative land use changes. The *specific* standards for these areas of concern presented in the later sections[27] will not be enough to safeguard against *indirect effects* of bioenergy developments, as they refer to a given site, plantation, process unit, or regional activity only.

A biomass plantation might be established on land previously used for grazing or cash crops, and fully comply with all specific standards elaborated on in the later sections. But the *previous* land-use might shift to other areas (e.g. forested or fallow) which could lead to significant deterioration of habitats, GHG emissions, etc.

As bioenergy development indirectly influence such pre-project and outside-of-project land-use activities through e.g. impacts on land prices and rents, one has to consider mechanisms to avoid negative impacts from such shifts[28].

The key mechanism proposed here is to make use of *land-use policies* in a country or region in which bioenergy developments are to occur to safeguard against indirect effects.

If the land-use policies and their implementation in a given country or region *is effective in preventing* negative impacts from land-use changes, e.g. by controlling access to and use of high-nature value areas and habitats, cultural sites, etc., then indirect effects of bioenergy developments on the overall land-use would be small[29]. In that case, bioenergy development should be concentrated on available *arable* land[30].

If a country or region has ineffective land-use policies (or none), then potential negative impacts of "shifts" in land-use due to the bioenergy development could occur. In that case, bioenergy crop development must be restricted to *areas which are not in competition to other uses*. Only then the potential "shift" with its respective impacts can be avoided.

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27 The other aspects covered by standards concern biodiversity, GHG emissions, Soil, and water (see later subsections). In addition, a minimum "land use efficiency" standard might be considered in future extensions of the core list of sustainability standards suggested here. For this, careful consideration of the potential biodiversity impacts of efficient (often translated into "intense") land use must be given.

28 On the other hand, one must consider also positive impacts, e.g. the restoration of degraded land through bioenergy activities.

29 This should bet he case also for non-bioenergy land use changes, so that the effectiveness of existing policies and their implementation can be considered on the base of other land-intense activities (e.g. mining, recreation facilities etc.).

30 In most industrialized countries, land-use policies are in place to regulate access to e.g. high-nature value land, migration corridors, and habitats of threatened or endangered species. In those countries, bioenergy cropping systems should be concentrated on arable land, as then no "shift" would be possible. Also, the "development" of fallow land, or the conversion of grasslands into bioenergy cropping schemes would be avoided. The potential of competition with food/fodder production is considered in Section 3.3.1.

To bring such a mechanism into operation, rules on classifying "uncompeted" land are needed. Often, one can assume that land which is physically or chemically degraded could fall into that category. The rules on classification should include an assessment of the potential environmental value of degraded land (abiotic aspects, biodiversity), and should prioritize areas where bioenergy cropping would be beneficial.

Focusing bioenergy development on degraded land would not only improve soil quality (if adequate cropping systems and management practices are applied), but also avoid pressure on "undeveloped" natural land.

Modern satellite surveys, GIS-based inventories of bioenergy production sites and farming locations in combination with digital mapping of relevant land characteristics would allow check of compliance with this standard within a reasonable cost range.

3.1.2 No Additional Negative Biodiversity Impacts

Biodiversity impacts need to be distinguished between the conservation of natural habitats, ecosystems, and species on the one hand and sustainable farming/production practice on the other hand which can help to preserve agro-biodiversity.

Protected areas:

- Protected areas, e.g. ecosystems, natural habitats, the maintenance of viable populations of species in natural surroundings and migration corridors, are to be *excluded* from bioenergy cropping areas.
- For rare, threatened or endangered species as well as for areas adjacent to protected areas (as buffer zones and potential furthering protection), degraded land and high nature value farming systems (e.g. grass land or small patterned traditional farming systems), management plans and farming operations must ensure protection.

Production practices:

- Preservation of genetic diversity, i.e. a *minimum number* of crop species and varieties, as well as *structural* diversity within the bioenergy cropping area must be maintained (needs to be specified for regions).
- For reasons of *precaution*, the use of genetically modified organisms (GMO) as bioenergy crops should be excluded, since they might have adverse environmental impacts.
- Appropriate fire protection strategies are needed, and use of fire to clear or prepare land for production should be allowed only if it is known to be the preferred ecological option.
- Alien species should be only cultivated with carefully controlling and monitoring, effects on wild life species should be blocked.

As mentioned before, digital mapping of relevant areas in countries and regions would allow checking of compliance of bioenergy operations with these standards.

Furthermore, farm-based annual inventories of agrochemical use are already part of subsidy schemes for conventional agriculture (e.g., cross compliance in the EU see Section 4.1.2, and Section 4.1.3 for national implications) which could be combined with the work of agricultural consultants to enhance farmer's knowledge on adequate management practices.

3.1.3 Minimization of Greenhouse-Gas Emissions

As GHG emissions result not only from bioenergy cultivation, but also downstream processing, a GHG standard for bioenergy needs to address both:

- A maximum life-cycle GHG balance of bioenergy cultivation of 30 kg/GJ must be demonstrated[31]. Compared with the life-cycle GHG emissions from (unprocessed) crude oil combustion, this limit represents a reduction of 67 percent.
- Processing of bioenergy crops - especially to biofuels – must demonstrate a minimum conversion efficiency of 67%, taking into account by-products for which a proof of use must be given. For the process energy, a maximum direct GHG emission factor of 60 kg/GJ input should apply.

In future stages of establishing bioenergy standards, GHG emission limits for final bio-based products such as liquid biofuels for transport or heating (e.g. bioethanol, biodiesel), solid chips or pellets for combustion, and biogenic gases (such as biogas, bio-SNG, or woodgas), and bio-electricity might be developed to take into account the different conversion routes, and by-products.

On the other hand, a simplified approach for GHG accounting should be developed for small-scale, rural systems farming of bioenergy crops to avoid excessive costs of compliance.

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31 This value is based on the calorific value (= lower heating value) of the bioenergy delivered at the field, including all inputs (e.g. fertilizer, pesticides, fossil fuel and electricity for mechanical equipment), and direct emissions from fertilizer application, and potential soil carbon release. No crediting for by-products or other allocation is allowed in the determination of the GHG emission factor.

3.1.4 No Additional Soil Erosion and Degradation

Soil erosion and degradation can result from the cultivation of energy plants as well as from the extraction of agricultural residues. In this context standards should address:

- Exclusion (or significantly restrictions) of bioenergy crops which need intense tilling, and below-surface harvesting (e.g., sugar beets)
- Maximum slope limits for bioenergy crop cultivation (needs to be soil specific);
- Maximum extraction rates for agricultural and forestry residues (needs to be specific for soil and crop/crop rotation);
- Acceptable removal levels for residues from agriculture and forestry must be specified so that humus and organic C contents of soils are not negatively affected.
- Application of farming and harvesting practices which reduce erosion risks, and adverse soil compaction (irrigation schemes, harvesting equipment).
- Application of irrigation schemes which prevent salination, and exclusion of cultures for which such schemes are not applicable (specific for soil type and crop semi-dry and dry regions).
- Application of farming practices which reduce impacts of nutrients, pesticides and lubricants. This must include qualitative standards concerning toxicity and biodegradability of agrochemicals (e.g. positive list of chemicals and user guidelines). Non-chemical pest treatment and organic fertilizers should be preferred[32].

3.1.5 Protection of Water Bodies

Standards should concern both agricultural water use and the protection of water bodies from impacts of agriculture. The following requirements must be met:

- Optimized cropping system which need low water input should be applied, such as agro-forestry systems in dry regions.
- Critical irrigation needs in semi-dry and dry regions must be avoided by applying water management plans (long term strategies and implementation program), and sustainable and efficient water supply for irrigation.
- Maintaining the quality and availability of surface and ground water, and avoiding negative impacts of agrochemical use (by timing and quantity of application)
- No untreated sewage water for irrigation
- Treated waste-water re-use has to be part of the agriculture management system.

[32] This standard is related also to the protection of biodiversity, and water bodies.

3.2 Environmental Assessment of Biomass Production

The main challenge of standards for sustainable biomass from the environmental perspective is to avoid any additional pressure on wildlife and farmland biodiversity, soil and water quality, and atmosphere/climate compared to the present reference situation. To assure this, the formulation of a number of biodiversity protection and soil and water conservation considerations was done above.

The listed indicators above are weak since they depend on regional soil and climatic circumstances and the present land use and farming practices. In order to involve these factors systematically and taking their regional variation into account, a general assessment method should be structured nationally. This should include

- General national environmental targets, e.g. share of extensive farming (organic, traditional, integrated etc.) or conservation of grasslands
- Identification of protected areas (habitats, migration routes) by country and species
- Identification of land for biomass production (agriculture, forestry, cuttings/residues) by country
- Identification of extraction rate for residues by environmental zone and crop/residue
- Environmental prioritization of crops (crop mixes according to an environmental zoning)

The first three bullet points create a general framework of the land potential, from a top-down-view whereas the last two bullet points are part of a good practice guidance for the cultivation and/or extraction of biomass.

In order to identify a crop mix per environmental zone and country that will create the largest environmental benefits, risk matrices have to be developed that help to prioritize potential biomass crops according to their environmental pressures.

An assessment scheme has been already worked out for agricultural bioenergy in Europe (EEA 2006), which is briefly introduced in Annex 1. This approach could be transferred to different regions and countries in order to prepare a specific set of indicators by country and/or environmental zone.

This assessment scheme was designed in order to identify the environmentally compatible potential of biomass in Europe. Yet, there has been no implementation into practice (e.g. standardization scheme, cross compliance obligation) so far.

3.3 Core Socio-Economic Standards

The multitude of possible social conflicts tied to the cultivation of energy crops precludes the development of a detailed set of standards within the limited scope of this paper. The following key standards are suggested as "generic", i.e. without special reference to geographical or political conditions.

Existing indicators in the division of to socio economic standards are management rules. Formulating "good practice" or management rules exist in the agricultural sector. They are available for different forms of farming, like organic agriculture. A monitoring system for social impacts is not necessary especially for bioenergy production. Existing labor standards (ILO Standard) are transferable. The following section demonstrates general indicators for chosen criteria.

3.3.1 Priority for Food Supply and Food Security

Basic human needs like food security should not be compromised by bioenergy development, i.e. the cultivation of energy crops to the disadvantage of food crops should be avoided. But compliance with this fundamental standard is extremely hard to measure, as no direct link between food (in)security and bioenergy exists, and quantified expressions of food security levels seem possible only on a country-wide scale where factors like employment, income distribution, welfare expenditures, legal rights (especially regarding land ownership), and education are far more important than local bioenergy crop production impacts (FAO 2005).

Food security and sustainability reinforce each other. Empowering the rural poor through the productivity and incomes strengthen also the food security.

Land area to be used for bioenergy production must not be in competition with food production. Still, decisions on bioenergy production have regional impacts, so that a regional risk assessment analyzing the potential impact of biomass production on local and regional food supply is needed (Lewandowski/Faaij 2004).

3.3.2 Rights to Use Land for Bioenergy Cropping

Use rights to the land dedicated to bioenergy production shall be clearly defined, documented and legally established. Long-term use rights to the land are necessary to guarantee income, to avoid poverty and to stabilize the social circumstances and living conditions. Local communities with legal or customary tenure or use rights shall maintain control. In this way they are in a position to protect their rights or resources. For a local interpretation of any customary land use rights or disputes which are likely to be relevant should be identified. Tenure and use rights shall be clearly defined, documented and legally established. Inspections are possible by field visits or through consultation of neighbors. A conflict register might be useful in that context.

Currently, good examples for such standards exist (FSC and RSPO, see Appendix 3).

3.3.3 Worker Rights and Share of Proceeds

The supply systems for bioenergy, i.e., the cultivation of bioenergy crops, the collection of biogenic residues and wastes, and their respective downstream, processing – must comply with ILO standards for worker safety, worker rights, wage policies, conditions for seasonal workers or working hours during harvest time, and child labor.

This standardization might be combined with income distribution and poverty reduction issues (share of proceeds).

Labor contracts rule conditions of employment, employees' rights, working time, over-time regulation, prohibition of forced labor or children work and specify salaries. The social criteria in the area of workers rights can be described by working contracts which need to comply with ILO standards. In Annex 3, an overview is given on those.

3.3.4 Avoiding Health Impacts from Bioenergy Cropping

This is similar to worker rights agreements: Occupational health impacts are regulated with the ILO Convention. Important indicators like first aid boxes, medical attendance and regularly information about dangers and risks of the work avoid accidents and offer a safe and healthy work environment.

4 Legal Options to Establish Sustainability Standards

The development and implementation of standards on biomass as an energy source can be supported and regulated with the help of different policy instruments and on different regulation levels. Three main categories of technology policy instruments to be applied can be described as following (RAND 2000):

- Financing knowledge infrastructure (direct subsidies for selected actors, supply of capital or financial and economic incentives), like the international and national financing institutions (ADB, EBRD, EIB, GEF, IDB, KfW etc.)
- Leading, stimulating and catalyzing knowledge dissemination (not in the focus of this paper)
- Facilitating (laws and regulations, standards, economic instruments), like private certification schemes for biomass, international Multi-Environmental-Agreements or legislation on the EU level.

The focus in Section 4.1 is on the facilitating policies regarding conventions, laws and regulations as well as on private certifications schemes for standards on the international, supra-national and national level.

In Section 4.2, already existing private certification systems like the “Round Table on Sustainable Palm Oil (RSPO)” and the “Forest Stewardship Council (FSC)” are described, and a first assessment for a sustainable biomass certification system is given.

4.1 International, European and National Policy Analysis

4.1.1 Legal Framework on the International level

In this chapter the basic conditions regulating sustainable biomass standards in an international agreement are described. Furthermore, main GATT/WTO principles to be taken into account in the setting-up of sustainable biomass standards are outlined.

Multilateral Environmental Agreements

An option to regulate sustainable biomass standards in a legally binding from would be through the adoption of a multilateral environment agreement (MEA) or by integrating the standards into existing international agreements or standards (e.g. ISO). In general, an international regulation of a sustainable biomass standard would be desirable as it would support the permissibility of such standards under international (trade) law. In general, an international agreement on biomass standards could establish basic principles and requirements with a “world-wide” recognition, appeal-function and influence. But regardless whether the final decision on the international agreement may be reached in a “consensus-procedure” or a unanimous or majority vote, the problem arises that ambitious standards may not be agreed upon.

Moreover, there are problems connected to using International Environmental Agreements for sustainable biomass standards:

The evolution of international agreements takes a longer time and full implementation by the contracting parties can take a *very* long time. Furthermore, many MEAs are neither complied with nor enforced, and are inadequately implemented, due to a combination of factors and problems (such as limited jurisprudence in international environmental law or soft commitments) that converge to create a context that is not conducive to achieving the commitments agreed upon by States in many MEAs. These problems can be observed at all levels (the international, regional, and national level), as well as at the negotiating stage.[33]

Taking into account the arguments above regulating biomass standards in an international agreement will have to be pursued over a longer period. In order to advance quickly with the implementation of standards they should not be the first step to develop and introduce biomass standards.

GATT/WTO Principles

The regulation of biomass standards on the international as well as on the supra-national and national level have to respect existing WTO rules. Whether sustainable biomass standards oppose specific trade obligations, cannot be researched in depth in this paper. However, standards for the production of biomass potentially run the risk of arbitrary discrimination and disguised protectionism. Therefore, sustainable biomass standards must be in line with core principles of the WTO.

The trade in biomass is covered by the WTO rules. It seems generally accepted that the production of primary and secondary energy does not constitute services according to the GATS (General Agreement on Trade in Services).[34] The Agreement on Agriculture[35] applies to the trade in ethanol.[36]

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33 See: http://www.unep.org/dec/support/mdg_meeting_col.htm

34 General Agreement on Trade in Services, Apr. 15, 1994, Marrakesh Agreement Establishing the World Trade Organization, Annex 1B, THE LEGAL TEXTS: THE RESULTS OF THE URUGUAY ROUND OF MULTILATERAL TRADE NEGOTIATIONS 284 (1999), 1869 U.N.T.S. 183, 33 I.L.M. 1167 (1994).

35 Agreement on Agriculture, April 15 1994, Marrakesh Agreement Establishing the World Trade Organization, Annex 1A, THE LEGAL TEXTS: THE RESULTS OF THE URUGUAY ROUND OF MULTILATERAL TRADE NEGOTIATIONS 33 (1999), 1867 U.N.T.S. 410. [Not reproduced in I.L.M.].

36 Annex 1 des Agreements on Agriculture, refers to the Harmonized System (HS) Chapters 1 to 24 less fish and fish products, ethanol is included by HS 2207.

Up until to the Uruguay Round, agricultural products were covered by the GATT. The WTO's Agreement on Agriculture (AoA) was then negotiated between 1986 and 1994. It was intended to be a first step towards fairer competition and a less distorted agricultural sector. The approach of the AoA is to replace various trade restrictions such as quotas, domestic support, export subsidies and non-tariff measures by "tariffs only". In order to reach this goal, the Members shall reduce their trade restricting measures in the agricultural sector according to specific targets ("Schedules"). The Doha Negotiation Round intended to further liberalise the trade in agricultural products, but the negotiations were suspended in July of this year due to irreconcilable positions in the two agriculture legs of the triangle of issues.

However, in regard to biofuels, a Doha Initiative might prove relevant: Ministers agreed to negotiate freer trade on environmental goods and services through the reduction or elimination of tariffs and non-tariff barriers. The term "environmental goods" was not defined in the declaration issued in Doha. However, ethanol was included in two product lists of potential candidate goods by the OECD and APEC.

Sustainability standards for biomass fall in the category of "non-trade" concern, i.e. non-tariff measures. Generally speaking, these are acceptable under the AoA if they do not represent an arbitrary or unjustifiable discrimination. If the sustainability standards are linked to subsidies (whether as such or in a combination with other instruments such as admixing quotas) it is questionable whether they are admissible under WTO law. This might be the case, if they would fall into the "green box". However, "green box" measures are generally decoupled from production. This question cannot be answered in this report, and will have to be pursued further, though.

In addition to the Agreement on Agriculture, the Agreement on Technical Barriers to Trade may be relevant for standardization issues.[37] Under the agreement, countries have the right to adopt the standards they consider appropriate, for example for human, animal or plant life or health, for the protection of the environment or to meet other consumer interests. They can also take the measures necessary to ensure their standards are met. International standards should be used where these are appropriate, but the TBT Agreement does not require Members to change their levels of protection as a result. Furthermore, the TBT Agreement discourages any methods that would give domestically produced goods an unfair advantage. The same is essentially holds true in regard to labels and certification schemes: The issue of unincorporated (non-product related) Processes and Production Methods (PPMs) has triggered a legal discussion in the WTO on the extent to which the TBT Agreement covers and allows unincorporated PPM-based measures, which is not finished yet.

[37] Agreement on Technical Barriers to Trade, April 15, 1994, Marrakesh Agreement Establishing the World Trade Organization: Annex 1B, THE LEGAL TEXTS: THE RESULTS OF THE URUGUAY ROUND OF MULTILATERAL TRADE NEGOTIATIONS, 33 I.L.M. 1145.

Thus, under WTO law, special standards for biomass products that are designated for imports, can be adopted provided they are not arbitrary or discriminatory. Generally, standards that are adopted through international or multilateral agreements will meet no criticism by the WTO. Subsidies on the other hand might prove difficult to maintain if the liberalisation of the agricultural sector advances.

4.1.2 Legal Framework on the European level

The European Commission has no explicit competence in the field of energy policy; but several competences established in the ECT (European Community Treaty) enable the European Commission to set up regulation with regard to energy matters.

For example Art. 3 lit. u) ECT refers to Community measures in the energy sector. Therefore the EC organs can dispose of the competence in Art. 308 ETC and, in the absence of an explicit established competence in the Treaty for energy policy, laws can be based on Art. 95 ECT if the functioning of the internal market is affected.[38] Where environmental aspects of energy policy are covered the competence can be derived from Art. 175 para 2 ECT. Whereas for Art. 95 ECT a qualified majority is necessary for Art. 175 para 2 ECT an unanimous vote is necessary.

Basically, there are two options to legislate biomass standards and related questions like the control or labeling of biomass on the European level. Either in a separate new law on biomass standards on which existing energy legislation can be linked to or through integration in already existing sector legislation affecting biomass, like:

- **The Directive 2001/77/EC regarding the promotion of electricity produced from renewable energy sources in the internal electricity market[39]:** The directive entered into force as from 27.10.2001 and contains the capability for changes of the national promotion systems for renewable energy up to a possible, European-wide promotion system. The main purpose of the Directive is to promote an increase in the contribution of renewable energy sources to electricity production in the internal market for electricity and to create a basis for a future Community framework thereof. A substantial goal of the directive is to increase the share of renewable energy in the gross power consumption to 22,1% until the year 2010. Due to this regulation in Directive 2001/77/EC a harmonized promotion framework cannot be expect before the end of 2012. After an evaluation of the different promotion models in the Member States will be issued a common promotion-framework with the goal of promoting the use of renewable energy sources effectively will be set up (Art. 4 para 2, S. 4, lit. d).

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38 Kloepfer, Umweltrecht, § 16 Rn. 13; Grabitz/Hilf, Das Recht der Europäischen Union, Band I, Art. 3 Rn. 18. .

39 Directive 2001/77/EC of the European Parliament and of the Council of 27 September 2001 on the promotion of electricity produced from renewable energy sources in the internal electricity market, OJ L 283, 27.10.2001, p. 33.

- **The Directive 2003/30/EC on the promotion of the use of biofuels or other renewable fuels for transport[40]:** This Directive aims at promoting the use of biofuels or other renewable fuels to replace diesel or petrol for transport purposes in each Member State, with a view to contributing to objectives such as meeting climate change commitments, environmentally friendly security of supply and promoting renewable energy sources.

- **The Directive 2003/96/EG restructuring the Community framework for the taxation of energy products and electricity[41]:** On the basis of the Directive 2003/96/EC an extensive Community framework for the taxation of energy products and electricity will be introduced for first time. As of 1 January 2004 a minimum rate of taxation of 0.5 EUR per MWh for electricity is applied (Art. 10 para 1 Annex I, table C Directive 2003/96/EC). According to Art. 15 the Member States have the possibility to provide tax exemption and tax reduction for electricity produced by renewables (Art. 15 para 1 lit. b). The implementation of this directive will basically change the taxation system in Germany (especially the taxation system with regard to biofuels).

- **Import regulations for biomass, e.g. Council Regulation (EC) No. 2501/2001[42]:** The Community's common commercial policy must be consistent with and consolidate the objectives of development policy, in particular the eradication of poverty and the promotion of sustainable development in the developing countries. The Regulation 2501/2001/EC provides for some special incentive arrangements for the protection of labor rights and special incentive arrangements for the protection of the environment. For instance the special incentive arrangements for the protection of the environment may be granted to a country which effectively applies national legislation incorporating the substance of internationally acknowledged standards and guidelines concerning sustainable management of tropical forests.

40 Directive 2003/30/EC of the European Parliament and of the Council of 8 May 2003 on the promotion of the use of biofuels or other renewable fuels for transport, OJ L 123, 17.5.2003, p. 42.

41 Directive 2003/96/EC of 27 October 2003 restructuring the Community framework for the taxation of energy products and electricity, OJ L 283, p. 51–70.

42 Statements on a Council Regulation applying a scheme of generalized tariff preferences for the period from 1 January 2002 to 31 December 2004, OJ, L 346, 31.12.2001, p. 60.

- **Council Regulation (EC) No 1782/2003 for direct support schemes[43] and Commission Regulation (EC) No 796/2004 for the implementation of cross compliance[44]:** Cross compliance is a series of standards that farmers need to meet in order to receive their subsidy payment in full. The full payment of direct aid was linked to compliance with rules relating to agricultural land, agricultural production and activity. Those rules serve to incorporate in the common market organisations basic standards for the environment, food safety, animal health and welfare and good agricultural and environmental condition. There are two main elements, Statutory Management Requirements (SMRs) and Good agricultural and environmental condition (GAEC) standards. Farmers will be inspected to check that they are meeting these standards, and breaches may result in sanctions being imposed. The Statutory Management Requirements require compliance with a small number of articles from 19 EC Directives / Regulations which address environmental, public, animal and plant health and animal welfare. 9 of these applied for cross compliance purposes in 2005[45], a further 7 applied in 2006[46], while the remaining 3 will apply from the 1st January 2007[47]. The Cross Compliance provisions could be seen as supplementary options to incorporate sustainable standards for biomass. However Cross Compliance means direct payment linked with the compliance of standards regulated in 19 different EC Directives or Regulations. Thus the linked standards are important issues regarding the Cross Compliance as an option to incorporate sustainable standards. Biomass support schemes are already considered by the Council Regulation (EC) No 1782/2003. According to art. 88 an aid of 45 € per hectare per year shall be granted for areas sown under energy crops used under the conditions laid down in Chapter 5 of the Council Regulation. Energy crops shall mean crops supplied essentially for products considered biofuels listed in Article 2, point 2 of Directive 2003/30/EC[48] and electric and thermal energy produced from biomass. The Council Regulation establishes a maximum guaranteed area and regulates that the aid shall be granted only in respect of areas whose produc-

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43 Council Regulation (EC) of 29 September 2003 establishing common rules for direct support schemes under the common agricultural policy and establishing certain support schemes for farmers.

44 Commission Regulation (EC) of 21 April 2004 laying down detailed rules for the implementation of cross-compliance, modulation and the integrated administration and control system provided for in of Council Regulation (EC) No 1782/2003 establishing common rules for direct support schemes under the common agricultural policy and establishing certain support schemes for farmers.

45 E.g. art. 6, 13, 15 und Art. 22 lit. b of the Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, OJ L 206, 22.7.1992, p. 7–50.

46 E.g. art. 3 of the Council Directive 91/414/EEC of 15 July 1991 concerning the placing of plant protection products on the market, OJ L 230, 19.8.1991, p. 1–32.

47 E.g. art. 4 of the Council Directive 98/58/EC of 20 July 1998 concerning the protection of animals kept for farming purposes, OJ L 221, 8.8.1998, p. 23–27.

48 Directive of the European Parliament and of the Council of 8 May 2003 on the promotion of the use of biofuels or other renewable fuels for transport (see above).

tion is covered by a contract between the farmer and the processing industry. According to the Council Regulation the provisions should be reviewed after a prescribed period taking into account the implementation of the Community biofuels initiative.[49] The review of energy crops scheme could be seen as a possibility to maintain the balance between biomass promotion and land use.

The advantage of a separate regulation defining the biomass standards in the European Union is that existing laws can be linked to that regulation. In that case future changes to the biomass standards only require one regulation to pass the parliamentary process instead of several regulations. Furthermore the existing regulations, e.g. for the generation of electricity or transport fuels from biomass, are not overloaded with details from the biomass standard.

So far the feed-in tariffs (pricing systems) and renewable portfolio standards (quota systems) used in the Directive 2001/77/EC and Directive 2003/30/EC do not demand certain production standards for the biomass to be used. In future the feed-in-tariffs and the quotas for biomass could be linked to sustainable biomass standards.

An important pre-requisite to apply feed-in tariffs, quota systems or import regulations only to biomass produced according to a sustainable standard is to make the standard transparent. As explained above, in order to be acceptable under WTO law, the standards should be agreed on in international or multilateral fora. Certification systems (i.e. labels) are admissible but need to be non-discriminatory and not result in unnecessary barriers or disguised restrictions on international trade. Labels that relate to PPMs are still being discussed in the WTO. Subsidies for agricultural products may become more controversial if a new round of negotiations is initiated in the WTO.

Therefore, parallel to the market regulation instruments, transparent production standards and corresponding labeling requirements must be introduced through EC legislation and/or private certification systems. Several options are possible for defining production standards and the labeling:

- The EC legislation defines different levels of sustainable standards for biomass reflected by different labels. They will be legally binding for every producer in the EU or importer who wants to profit from feed-in tariffs, quotas or tax reductions. The tariff system or the quotas can be clustered according to different sustainable biomass standards: minimum standards can correspond with a base-line of feed-in tariffs, tax reduction or quotas whereas higher standards can be rewarded with a higher feed-in tariff or tax reduction.

[49] According art. 92 the Commission shall submit a report to the Council by 31 December 2006 on the implementation of the scheme, accompanied, where appropriate, by proposals taking into account the implementation of the EU biofuels initiative.

- The EC legislation defines only minimum sustainable biomass standards reflected by a label, which are legally binding for every producer/importer. Higher standards can be set up by private certification systems and are only binding to those who participate in the system (see the parallel labeling-system of organic food, Regulation (EC) No. 2002/92). The reward for the higher standard will depend on the market and not be recognized in the pricing-system, quota or tax reduction.

European legislation versus national legislation

Although it is widely recognized that EU legislation has remarkable advantages compared to national legislation as it can bring about solutions for trans-national environmental problems, legislation on the European level is not per se the most efficient solution for environmental problems (Calliess 2003). The EU is bound by WTO because it is a Member to this organisation as well. Furthermore, it has to be kept in mind that all negotiations in regard to the international trade in biomass fall into the competency of the EU anyway.

General arguments to be taken into account for a regulation of biomass standards on an EU level are:

- The European Union is one of the biggest energy markets in the world, thus a European–wide standard will be of significance for European producers of biomass and importers.
- A regulation on the European level will help to avoid distortion of competition in the EU and to prevent a race to the bottom concerning environmental standards.
- If biomass standards are set on a European level there is the danger that they will reflect only the least common denominator.
- A European legislation could suffer from a time lag, if there are big differences between the 25 Member States about the goals and design of the legislation.

The conflict between the advantages of a central solution on the European level and the advantages of a decentralized national implementation is reflected in the principle of subsidiarity in the ECT. In areas which do not fall within the Communities exclusive competence, like energy policy, the Community shall take action, in accordance with the principle of subsidiarity. The principle of subsidiarity (Art. 5 ECT) states that

> "only if and in so far as the objectives of the proposed action cannot be sufficiently achieved by the Member States and can therefore, by reason of the scale or effects of the proposed action, be better achieved by the Community."

The environmental impacts (e.g. negative impacts on biodiversity, protection of water bodies and the soil erosion and degradation) as well as the socio-economic conditions (e.g. the worker rights and income levels) of biomass production in the European Union can differ remarkable. Therefore, an EU legislation on biomass standards should give the Member States the option to adapt it to their individual conditions and needs. In order to establish a level-playing field for sustainable biomass (e.g. reduce distortion of competition and a race to the bottom concerning environmental standards) a European legislation must regulate minimum standards. From the point of the subsidiarity principle this is favorable, too. For those Member States who wish to set up better standards an "opting-up"-clause can be included in the legislation. However, the detailed design of a EU legislation on biomass standards and labeling conditions remains to be researched.

4.1.3 Legal Framework on the National Level

On the national level the German Constitution in Art. 74 Nr. 11 empowers basically the federal state (Bund) to regulate energy matters. The regulation can be systemized in regulation for saving of energy and regulation for energy generation.[50]

Legislation on biomass standards can be regulated in a separate law and be linked to sector legislation, or it can be integrated in the sector legislation. The same arguments mentioned for a separate legislation on the European level (see Chapter 4.1.2) apply to the national level.

Important examples for sector legislation in Germany already existing and being relevant for biomass standards are first of all:

- **The Renewable Energy Sources Act (EEG)[51]:** The aim of the EEG is to promote electricity produced from renewable energy sources in the internal electricity market on the basis of feed-in obligations and duty to reimburse by the network operators. The purpose of the EEG is the development of renewable energy as an important element of climate and environment protection. The share of renewable energy in electric power supply in Germany should be increased to at least 12.5 % until 2010. Only electricity exclusively produced from renewable energy sources like biomass will be promoted (Art. 3 EEG).
- **The Biomass Ordinance[52]:** regulates special environmental requirements (Art. 5 Biomasse-Verordnung) with regard to the technical procedures for the generation of electricity from biomass. These requirements could be seen as a starting point to link the existing legal regulation with sustainable biomass standards.

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50 Kloepfer, Umweltrecht, § 16 Rn. 12.

51 Act from 21 of July 2004, BGBl. I 2004, p. 1918; last amendment from 7 of July 2005, BGBl. I 2005, p. 1970.

52 Ordinance from 21 of June 2001, BGBl. I 2001 p. 1234; last amendment from 9 of august 2005, BGBl. I 2005 p. 2419.

- **The petroleum tax law[53]:** The implementation of the directive 2003/96/EC (see supra) will result in fundamental amendments of the petroleum tax law. According the purposes of the federal government the law shall be replaced by a new regulation ("energy tax law").
- **The direct payment – compliance law[54] and direct payment – compliance ordinance[55]:** The EC Council Regulations apply directly to national level. Nevertheless the European provisions, e.g. the Good agricultural and environmental condition (GAEC) were implemented into German law and concretized by the mentioned regulation. The relevant authorities of the German Laender particularly have to check the enforcement of the Cross Compliance regulations. Generally speaking the relevance of Cross Compliance is more on the European level.

As in most countries the public sector (national or regional governments and companies held by them) and large single energy consumers should use their position to advance renewables like energy from biomass by creating guaranteed demand for renewable energy and technologies over a given period of time. It remains to be researched how far and under which circumstances public procurement can take into account biomass standards.

4.2 Instruments (Examples)

Suitable instruments to frame sustainable standards for biomass are described in the following chapter. A prerequisite for the legal promotion is the generation of energy from renewable sources, e.g. from biomass. A key issue to be clarified in further research is whether the current legal instruments could be combined with extensive prerequisites regarding biomass standards.

4.2.1 Feed-in Tariffs

So far a system of guaranteed prices (feed-in tariffs) for renewable electricity (or heat) as an instrument for the promotion of renewable energy has been implemented in the German EEG, and similar regulation exists in about 40 other countries. Operators of especially defined facility categories on the one hand obtain the guarantee to feed in electricity and on the other hand they are paid legally defined fixed minimum prices (for biomass see Art. 8 para 1 EEG).

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53 Act from 21 of December 1992, BGBl. I 1992, p. 2150, S. 2185 (1993, S.169); last amendment from 22 of December 2004, BGBl. I 2004, p. 3702.

54 Act from 21 of July 2004; BGBl. I 2004, p. 1763, 1767.

55 Ordinance from 4 of November 2004, BGBl. I 2004, p. 2778, amended by ordinance from 26 of May 2006, BGBl. I 2006, p. 1252.

4.2.2 Tax Exemption/Reduction

Due to the fact that biofuels (e.g. biodiesel) can reasonably complement fossil fuels, they have been exempted from petroleum taxation for many years. Since 2003 reduced tax rates apply for mixtures of biofuels and petroleum; the tax rates are based upon the share of biofuels in the mixture.[56] Thanks to the exemption of petroleum taxation the market for biodiesel increased continuously in the last years.

As a result of the implementation of the Directives 2003/96/EC "restructuring the Community framework for the taxation of energy products and electricity" and 2003/30/EC "on the promotion of the use of biofuels or other renewable fuels for transport" into the national law the current petroleum taxation law will be replaced by the energy taxation law[57]. One of the substantial amendments will be the abrogation of tax exemptions for biofuels; as from 1 of August 2006 the bio fuels will be also subject to tax (exception: biofuels used in agriculture and forestry). The taxation of biofuels is the consequence of the results gained by the federal government and presented in the biofuel report (BuReg 2005). The report arrived at the conclusion that biofuels were "over-promoted" by tax exemptions. For that reason the national policy will be modified: tax exemptions and tax reductions for biofuels will be replaced step by step by admixture quotas. Therefore the tax instruments of the energy taxation law are not the prior instruments for the possible introduction of sustainable standards.

Another possibility to link sustainable standards with tax instruments is given with regard to the Electricity taxation law[58]. The regulation aims at promoting the generation of electricity from renewable sources and established a tax exemption for electricity produced from renewable energy sources (Art. 9 para 1 StromStG).

4.2.3 (Admixture) Quota

Recently the German Federal Government submitted a draft of the so-called *biofuel quota law* ("Biokraftstoffquotengesetz"). The draft plans the introduction of admixture quotas for biofuels. Instead of tax exemptions and tax reductions, the use of biofuels shall promoted by legally defined mixture quotas which increase over time. The biofuel quote law is a part of the implementation of the Directives 2003/96/EC and 2003/96/EC into national law.

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56 See Art. 2a petroleum taxation law (this article was implemented by Act from 23. July 2002, BGBl. I, p. 2778); last amendment by Act from 22. December 2004, BGBl. I, p. 3702.

57 Act from 15 of July 2006, BGBl. I, p. 1534.

58 The electricity taxation law (Stromsteuergesetz, StromStG) entered into force as a part of the „Act for the introduction of the ecological tax reform" of March 24, 1999, BGBl. I, p. 378; last amendment by Act from 29 of December 2003, BGBl. I, p. 3076.

4.2.4 Import Regulations

Import regulations are often legislated by supranational organizations, because they serve for the regulation of regional (supranational) markets. The linking of biomass standards to this instrument could be interesting for policy making on the European level. One example is the mentioned Council Regulation 2051/2001/EC being legally binding in the Member States. However, as pointed out above, import restrictions such as quotas go against the principle of "tariffs only" of the Agreement on Agriculture.

4.3 Analysis of Existing Certification Instruments

In parallel to governmental regulations, voluntary schemes applying sustainable standards like the RSPO, the Pan-European Forest Council (PEFC) and the FSC aim to include relevant economic players and customer organizations in the standard setting process for sustainable biomass.

In the following table, elements of the organizational elements/criteria of the RSPO, PEFC and FSC are described and a first evaluation of the criteria regarding the alignment to a possible sustainable biomass certification system is given.

Table 4 Organizational Elements and Criteria for a (fictive) Sustainable Biomass Certification Body (SBC) in Comparison to RSPO, PEFC and FSC

	RSPO	PEFC	FSC	SBC
BASICS				
Basis for company participation	Voluntary Membership in an Association under Swiss Law (Art. 60 SCC)	voluntary	Voluntary	voluntary
Scope of certification system	**Limited to members of RSPO** No certification of third parties; entire supply chain for palm oil	All forest types throughout the world (where a PEFC accredited national scheme exists)	All forest types throughout the world	All types of biomass throughout the world (limitations: special plants, whole production process)

	RSPO	PEFC	FSC	SBC
GOVERNANCE				
Governance structure	form of legal entity: private association General assembly (all members of RSPO) Executive Board, 16 Members (economic, social, environment organ.) Secretariat (daily management)	National Governing Bodies, each appointing voting delegates to the PEFC Council General assembly Board of Directors Majority voting on all decisions (forest industry holds majority)	FSC International Center, Regional Offices, National Initiatives Membership / General assembly Board of Directors Balanced representation of 3 chambers (economic, social, environment) at all levels (incl. North/ South differentiation); with equal voting power and consensus orientation	Structure should reflect all dimensions of sustainability and balance of powers
Representation	ordinary members (restricted to 7 categories, e.g. actors in the custody chain including Banks, Investors, Environmental, social and develop. NGOs) affiliated members (other than the 7 categories)	Academic, government, industry and consulting sectors; strong support of forest industry and forest owner, weak or no support of social and environmental NGOs	Academic, government, industry and consulting sectors; supported by all segments of civil society, particularly large international social and environmental NGOs	Broad scope reflecting the dimensions of sustainability
STANDARDIZATION				
Development of standards	General Assembly (international) establishes the principle guidelines for the general policy of RSPO Guidance Document for RSPO Principles and Criteria for Sustainable Palm Oil Production	Endorsement of national forest certification schemes, whose standards vary greatly	Based on worldwide set of ten principles and criteria; adapted to national or regional conditions by national working groups with stakeholder participation	- Important criteria; - Adaptation to heterogenous biomass sources on regional level
Scope of the standardization process	Environmental, social, economic issues	Forest management and chain-of-custody certification; Environmental, social, silvicultural, economic issues	Forest management and chain-of-custody certification; Environmental, social, silvicultural, economic issues	Similar
Public input	No public input from non-RSPO members Affiliated Members (no voting rights, limited access to information)	Limited public consultation; incomplete transparency and stakeholder participation	Subject to public review; complete transparency; broad stakeholder participation	Similar; quality of public review focus on transparency
Approval	General Assembly	PEFC Council	National General Assembly + Accreditation Service Inter-	Depending on governance structure

	RSPO	PEFC	FSC	SBC
			national on behalf of FSC International	
Updating to the standard	Open (meeting of the Assembly once a year)	Every 5 years	Every 5 years	Updating necessary
Certification Body Qualifications (Accreditation)				
Reviewer		A national accreditation body; independent from PEFC	Accreditation Service International (ASI) on behalf of FSC	similar
Evaluation Process		Variable; depends on national accredition body	ASI audits the applying certification body`s documents and office	Adaptation to the certification process for biomass
Approval		Recognition of accredition by national accredition body by PEFC Council	FSC Board of Directors makes a decision based on ASI findings	Separation of powers and decision on superior level necessary
Monitoring		No inspections by PEFC	Annual inspections of certification body's office and field work by ASI	important
Renewal		No regulation	Every 5 years	important
Verification (Judging Conformance to the Standard)				
Reviewer	None	Accredited third party auditor (Certification body)	FSC-accredited third party auditor (Certification body)	likewise structure necessary to achieve a high reliability of the certification system
Evaluation Process	None	Certification on regional level allowed; random inspection after award of certificate; auditor reviews documentation, conducts a field assessment Annual audits Audit results not regularly and/or not completely published	Certification of Forest Management Units; evaluation of FMU before award of the certificate; auditor reviews documentation, conducts field assessments and consults relevant stakeholders Annual audits; audit results made public	Necessary for internal/external transparency and reliability/ confidence in the certificate
Approval	None	Certification body decides, based on feedback from the auditors and the applicant (client); no peer reviews required	Certification body decides, based on feedback from the auditors, the applicant (client) and two impartial peer reviews.	Necessary for internal/external transparency and reliability/ confidence in the certificate
Public input (file a protest)	None	Any member of the public can file a dispute if there is a disagreement with	Any member of the public can file a dispute if there is a disagreement with	Necessary for internal/external transparency and reliability/confidence in the

	RSPO	PEFC	FSC	SBC
		the decision or ongoing compliance to the standard.	the decision or ongoing compliance to the standard.	certificate
Product Tracking and Claims				
Material Tracking	No label in place	Chain of Custody tracks products from forest through each stage of manufacturing and distribution Either physical separation, batch definition or volume calculation	Chain of Custody tracks products from forest through each stage of manufacturing and distribution. Either physical separation for pure products or mixture with strict control of all non-FSC-sources	Chain of custody from plant to end-product
On-Product label		One label with two optional claims depending on content (100% or less then 100% PEFC)	Three product labels (pure, mixed and recycled label), various claims describing real content	Differences: label necessary for source tracking (see "green electricity label")
Use of non-certified sources and labeled products		Avoidance of illegal or unauthorized harvested wood	Avoidance of wood from forest areas which have been illegally harvested, where traditional or civil rights are violated, which has been cleared for plantation or other use, from forests with threatened High Conservation Values and of genetically modified (GM) trees	equivalent

Source: own compilation

4.4 Roadmap for Implementing Sustainability Standards for Bioenergy (Basic Approaches)

4.4.1 Approach 1: "Ideal" Regulations

Standardized Guidelines

Key issue: On which level (international, European, national, local) should sustainable standards for biomass be regulated – which level is the appropriate level for different local requirements.

- International level: recommendable is an agreement on *objectives* about standards for bioenergy; in the agreement, the *framework* conditions for handling sustainability criteria regarding bioenergy sector should be regulated; within the agreement, environmental, social, and economic criteria for the different sectors shall be established.
- EU level: further step of refinement regarding the objectives; international framework agreement has to be conformed with the EU legal framework; the EU regulation should be more detailed than international regulation; an go beyond the minimum criteria of the international agreement; on the European level, concrete instruments could be applied (all instruments mentioned before: feed-in tariffs, admixture quotas, tax exemption, import regulations).
- National level: on this level the implementation of EU regulation is the most important demand; likewise on this level the mentioned instruments have importance for possible links with sustainable standards.

Enforcement of regulations (controlling the compliance of criteria)

Certification institutions for biomass standards can be:

- governmental institutions: certification with regard to governmental guidelines
- private certification institutions: certification with regard to governmental guidelines and (possibly stricter) private guidelines
- Special case: voluntary agreements of biomass producers (companies in the chain of custody, e.g. RSPO), whose statutes or internal regulations contain several biomass standards and require the compliance with these by their members, but not having a monitoring system and being based upon goodwill.

Object of Certification:

- governmental regulation for biomass minimum standards or
- governmental minimum *and* private standards (going beyond the requirements of a possible EU regulation), e.g. comparison with Fair Trade or private organic labels (e.g., Demeter, Bioland) compared to the EU Council Regulation (EC) No. 2092/91 on organic agriculture.

4.4.2 Approach 2: Bottom-up Approach

Key issues:

1. Which player can be the “moving spirit”?

   Criteria could be:

   - obligations needed to reach consensus in the decision process
   - time needed to introduce and implement standards

- interest in the implementation of sustainable standards

2. Which existing instruments can be used already to push the process?
3. Legislation on international and European level, even on national level, takes a lot of time and requires several consulting procedures. The alternative to legislation and regulation by governmental organs are private institutions (RSPO, Responsible Soy).

As regards players, bi- and multilateral financing institutions like the EIB or GEF are in a prime position to implement sustainability standards for their (project-financing) operations. Their existing rules of operation can be extended to cover sustainability standards, and they might cooperate with existing initiatives like FSC to establish procedures for monitoring and verification of such standards (e.g., through a certification scheme).

This approach would be similar to the implementation of the CDM.

5 Recommendations on Implementing Sustainability Standards

The establishing of national, European, and international sustainability standards for bioenergy must take into account:

- the scope of a possible regulation,
- the question, whether a regulation should be legally binding (e.g. a convention/law) or with restricted or no binding force, like a voluntary agreement or certification for biomass,
- the permeability of a regulation for a possible transpositions on an inferior level (e.g. relationship of an EU regulation and national regulations) and
- the time horizon for implementation.

Coherence and reciprocity are required to avoid as far as possible discrimination against actors in the custody chain. Furthermore, the respective governance structures must be considered, especially the extent and type of stakeholder involvement can be seen crucial for the overall acceptance of biomass standards.

All standards suggested in Section 3 need *refinement with respect to regional scope*, and should take into account the applicability for larger-scale operations, and smallholder activities. Furthermore, this process must actively involve stakeholders, both from civil society, and industry.

5.1 Creating Dynamics

It is recommended *to start* with a set of negative standards ("avoidance of") which can be implemented as conditions to support schemes on the national and EU level, and which are *legally binding*. Such standards could be implemented in the short-term.

International and national *financing institutions* (ADB, EBRD, EIB, GEF, IDB, KfW etc.) should be encouraged and supported in introducing *sustainable bioenergy standards for their operations*. This could help also to establish good practices, and to test monitoring, certification and verification schemes.

For international arrangements concerning bioenergy trade (i.e., import restrictions), a multilateral setting is required for which the G8, UNCTAD/UNEP, and FAO initiatives seem to be appropriate fora. The options to establish sustainability standards for bioenergy under the WTO rules must be explored in more detail, but to negotiate a coherent framework might take decades, though.

Still, bodies like the EU should partner with interested countries like Brazil, or South Africa to create *bi- or multilateral agreements* on sustainable bioenergy imports which are subject to standards, and verification procedures. Such agreements could form an important first step for future "true" multilateral agreements, and demonstrate the applicability of the overall approach.

5.2 Including Voluntary Approaches

Voluntary schemes like the FSC and RSPO should be discussed in parallel, aiming to include relevant economic players and customer organizations. National governments and supranational bodies like the GEF should be included as forerunners.

For all activities, the *active participation* of both civil society and industry representatives from the concerned sectors is required.

5.3 Getting Started

To proceed, a *core group of actors should be formed* which could raise resources to manage the overall process of information exchange on (national or regional) forerunners, demonstration cases, and good practice in general, and to actively work towards the inclusion of NGOs, and industry.

WWF should consider to become one of such actors, and should invite other NGOs to join. In parallel, WWF should continue to actively seeking partners, e.g., from the EU Commission, FAO, GEF, and dedicated industry representatives. Players like e.g., the UN Foundation, Heinrich-Böll-Foundation, should consider to support this process.

The linking of activities like the FAO Sustainable Bioenergy Platform with others like the G8 Global Bioenergy Partnership on the "office" level could be a model to start with. Bilateral donors might add resources, and capacity-building elements for developing countries, and existing initiatives like the UNEP/UNCTAD/UN Foundation on biofuels and the IEA Bioenergy Task 40 could join.

The G8-GBEP and the EU Commission, as well as several countries are in the process of formulating sustainability standards for bioenergy, and donor agencies, industry associations, and NGOs participate in meetings, conferences and workshops to exchange views, and to express opinions.

As a variety of actors are currently positioning themselves in the bioenergy "arena", the time is right to suggest such a formation – starting with a loose focal point of exchange, and moving on to create the coherent framework for a truly sustainable bioenergy development on the global scale.

5.4 Beyond Bioenergy: Sustainable Carbon?

The agreement on and implementation of the core standards would be an important step to establish bioenergy and biofuels as a basic element of a sustainable (global) energy strategy, as suggested earlier (Fritsche/Matthes 2003). Still, from a scientific point of view it would be - *in parallel* to these implementation activities - worthwhile to consider also *enlarging the scope of the endeavor*: The core standards could become an umbrella under which the various biomass-derived products – from coffee to textiles, from fruit to timber – might be integrated with respect to minimum sustainability requirement. In that process, the standards could move from voluntary approaches for the "willing" to market *conditionalities for sustainable global trade*.

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List of Acronyms

ADB	Asian Development Bank
AoA	Agreement on Agriculture
CBD	Convention on Biological Diversity
CDM	Clean Development Mechanism
CIS	Commonwealth of Independent States
EBRD	European Bank for Reconstruction and Development
EC	European Council
EEA	European Environment Agency
EEB	European Environmental Bureau
EEG	Renewable Energy Sources Act (Erneuerbare Energien-Gesetz)
EIB	European Investment Bank
EJ	ExaJoules
EU	European Union
EUGENE	European Green Electricity Network
FAO	Food and Agriculture Organization of the United Nations
FLP	Flower Label Program
FLO	Fairtrade Labeling Organizations International
FSC	Forest Stewardship Council
GAEC	Good agricultural and environmental condition
GATS	General Agreement on Trade in Services
GATT	General Agreement on Tariffs and Trade
GEF	Global Environment Facility
GHG	greenhouse gases
GIS	geographical information system (with digital spatial database)
GTZ	Deutschen Gesellschaft für technische Zusammenarbeit GmbH
HANPP	human appropriation of net primary production
IDB	Inter-American Development Bank

ILO	International Labor Union
ISO	International Organization for Standardization
IUCN	International Union for the Conservation of Nature and Natural Resources
KfW	Kreditanstalt für Wiederaufbau
MEA	multilateral environment agreement
NGO	Non-governmental Organization
OECD	Organization for Economic Cooperation and Development
OEKO	Öko-Institut (Institute for applied Ecology)
PPM	Processes and Production Methods
RSPO	Round Table on Sustainable Palm Oil
SBC	Sustainable Biomass Certification Body
SMR	Statutory Management Requirements
SRC	short rotation coppice
UNFCCC	United Nations Framework Convention on Climate Change
WBGU	Wissenschaftlicher Beirat der Bundesregierung Globale Umweltveränderungen (German Government's Advisory Council Global Change)
WWF	World Wide Fund for Nature
WWI	WorldWatch Institute

Annexes

A-1 Environmental Prioritization of crops

An assessment scheme has been already worked out for agricultural biomass production in Europe, which is introduced in this chapter[59]. As this method already covers the different regions and countries throughout Europe it seems to be suitable to be transferred to further countries and environmental (pedo-climatic) zones in the world.

Starting point: An identification of a crop mix per environmental zone and country is needed that will create the largest environmental benefits. The mixes should support environmentally sound farming practice specifically adapted to reduce the environmental problems and risks that are typical to the different environmental zones of Europe. Therefore risk matrices were developed that help to prioritize potential biomass crops according to their environmental pressures (specific per environmental zone):

First a selection of the main environmental and ecological pressure indicators was made which are needed to describe potential problems and/or benefits caused by the cultivation of energy crops. The set of indicators varies from one environmental zone (region, country) to another.

In the next step a crop-by-crop analysis was made. This results in a crop specific description of problems and benefits caused by the cultivation for each potential energy crop. The characteristics to be incorporated are:

a. Climatic suitability
b. Present land use
c. Present farming systems
d. Present environmental problems.

A low risk of environmental impact is scored with A, a high risk with C. There are examples given for linseed as an annual crop and for short rotation coppice (SRC) of willow and poplar as perennial crops below.

59 A more detailed description can be found in EEA (2006).

Table A-1 Overview of Pressures per Crop - Linseed (annual crop)

Aspect	**score**	**reason**	**source**
Erosion	A	low risk especially winter linseed	ifeu
Soil compaction	A	intensive rooting	Elbersen et al., 2005
Nutrient inputs into surface and groundwater	A	Low to medium demand, good fixation	Elbersen et al., 2005
Pesticide pollution of soils and water	B	low competitive in growth rate	Elbersen et al., 2005; ifeu; Marten
Water abstraction	A	low water demand	ifeu
Increased fire risk	---	---	---
Diversity of crop types	A	High, as currently not very common	FAO
Link to farmland biodiversity	A/B	Low input use, open crop structure with weeds, may provide fodder in autumn	Own assessment

Table A-2 Overview of Pressures per Crop – SRC poplar and willow (perennials)

Aspect	**score**	**reason**	**Source**
Erosion	A	permanent crop	own assumption
Soil compaction	A	deep rooting. permanent crop	Elbersen et al., 2005, Kaltschmitt
Nutrient inputs into surface and groundwater	A	low fertilizer use, N-storage in rhizomes	Elbersen et al., 2005, Kaltschmitt
Pesticide pollution of soils and water	A	young plants are only little competitive, afterwards no plant protection is necessary	Elbersen et al., 2005; Kaltschmitt
Water abstraction	C	high transpiration ratio:800l/kg dm	Elbersen et al., 2005; Kaltschmitt
Increased fire risk	---	Not in dry regions	---
Diversity of crop types	A	currently not very common, birds nesting inside plantations	Own assumption
Link to farmland biodiversity	A/B	No/low pesticide use; nesting habitat and provides winter shelter	Own assessment

An initial selection of biomass crops per environmental zone was be derived from given mixes of crops already grown for food, non-food and energy purposes. This included commercial settings as well as serious long term experiments. The latter was chosen as there is still less experience with perennial energy crops.

At least the main biomass crops were prioritized according to their environmental pressures for every environmental zone. The result was a selection of a biomass crop mix per environmental zone of which it can be expected that it will not impose any *additional* pressure on farmland biodiversity. The prioritization is done by risk matrices in which the different crops were rated according to the environmental and ecological pressure indicators specified in the crop-by-crop analysis.

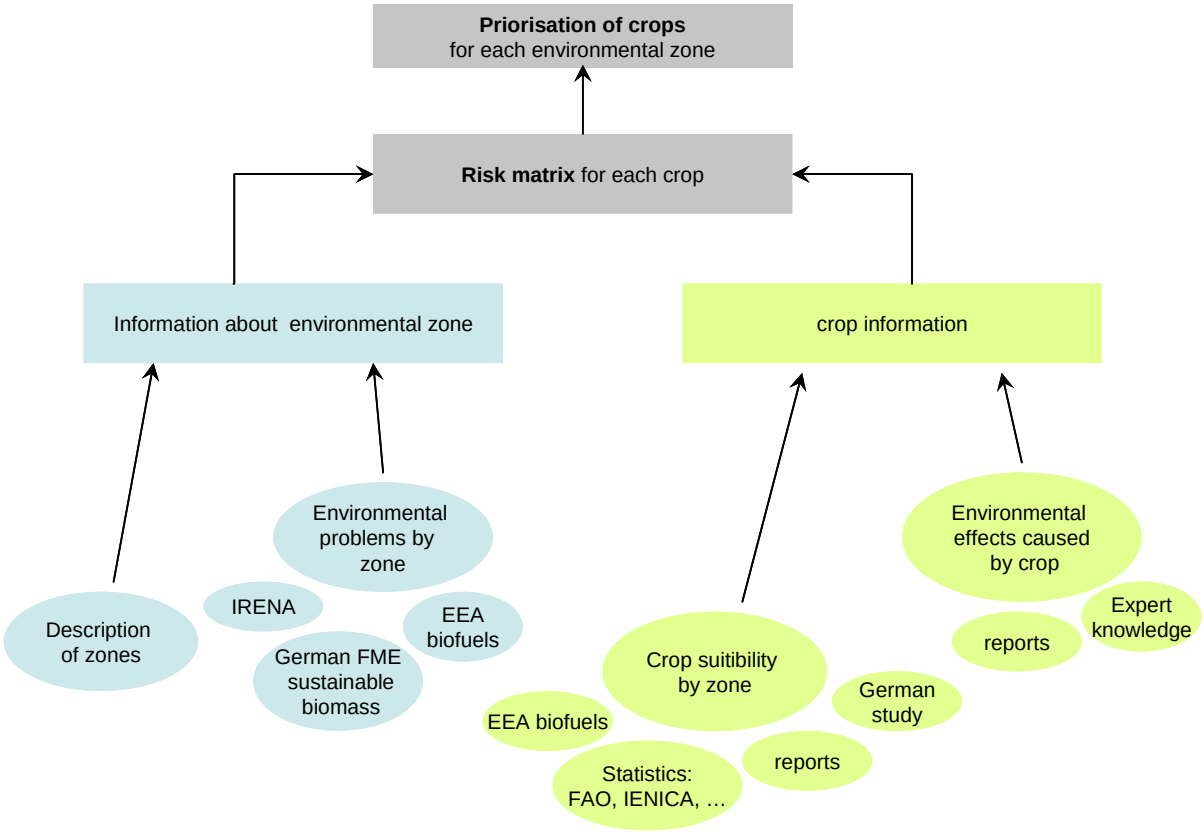
As an example the prioritization of annual crops for the Atlantic Central and Lusitanian Zone is given in the following table.

Table A-3: Prioritization of Annual Crops for the Atlantic Central and Lusitanian Zone

								only Lusitan.						
Atlantic Central Lusitanian	**Double cropping**	**linseed (oil)**	**Other Cereals**	**cultivated grass**	**Clover. alfalfa**	**Hemp**	**Sorghum**	**Mustard seed**	**Wheat**	**Sun flower**	**Rape**	**Sugar beets**	**Potatoes**	**Maize**
Erosion	A	A	A	A	A	A/ B	A	A (B)	A	B/C	B	C	C	C
soil compaction	A	A	A	A/B	A/B	A	A	A	A	A	A	C	C	B
nutrient inputs to surface and groundwater	A	A	A	B	B	A	A	B	A	A/B	B/C	B	B	C
Pesticide pollution of soils and water	A	B	A	A	A	A	B/ C	B	A	B	C	B	B	C
water abstraction	---	A	A	A	A	B	A	B	B	B	B	B	C	A/B
Increased fire risk	---	---	---	C	---	---	A	---	---	---	---	---	---	---
diversity of crop types	A	A	B	A	A	B	B	A	C	A (B/C)	A/B	B	A/B	B/C
Link to farmland biodiversity	B	A/ B	B	A	A/B	B	B	B	B/C	A/B	B/C	B	B/C	B/C

An overview of the working steps to select environmental prioritization of biomass crops by environmental zone is given in the figure below.

Figure A-1 Overview of the working steps to select environmental prioritization of biomass crops by environmental zone



Source: OEKO/Alterra 2006

The EEA study identified crop mixes. The next step in the direction of an environmentally compatible biomass production would be to create guidelines for an environmentally sound farming practice for each crop.

A-2 Synopsis of Environmental Standards for Biomass

	American Tree Farm System	**Basel Criteria for Responsible Soy Production**	**EUREPGAP**
Biodiversity	4: forest owners provide timely restocking of desirable species of trees, compatible with regional ecosystems on harvested areas and idle areas where tree-growing is the land use objective 4.1: land must be reforested with natural seeding, sprouting, direct seeding, or reforestation with tree seedlings 5.3: where prescribed fire is used, the forest owner must plan appropriately for its application 5.3.1: landowner affirms that if and when prescribed fire is used, it is conducted in accordance with the owner's management plan and with state and local laws and regulations 5.3.2: on-site visit confirms prescribed fires, if used, were conducted in accordance with the management plan and applicable laws and regulations 6: forest management activities contribute to the conservation of biodiversity and maintain or enhance habitat for native fish, wildlife, and plant species, with emphasis on natural plant and animal communities and rare plants and animals 6.1: landowners are encouraged to confer with their local natural resource agencies, state natural resource heritage programs, or other knowledgeable sources about rare species or species of concern that occur on their property 6.1.I: where practical, management plans consider and address opportunities to protect rare species and special habitat features 6.1.2f: forest owner or forester responsible for developing the owner's management plan has made a reasonable effort to locate and secure information that denotes the location of rare species or species of concern; appropriate sources of information include, but are not limited to county, state and federal agencies, university and extension programs and local knowledge 6.2: forest management activities must maintain or enhance habitat for owner's designated fish, wildlife, and plant species as identified in the management plan 6.2.1: forest management activities must maintain or improve habitat for owner's target game and non-game fish and wildlife species	3.1.1: clearance of primary vegetation and High Conservation Value Areas to create agricultural land after 31 July 2004 is prohibited; this applies irrespective of any changes in land ownership or farm management that have taken place after this date; farm development should actively seek to utilise degraded and abandoned agricultural land 3.1.2: grower must demonstrate that they have actively and sufficiently compensated for the loss of natural ecosystems through such measures as: restoration activities on the farm to enhance biodiversity, procuring and protecting areas of natural vegetation locally, financing conservation initiatives that directly result in the protection of natural ecosystems locally (e.g. helping to establish one or more protected areas; assisting funding for protected area management) 3.3.1: an understanding of the plant and animal species and habitats that exist inside and around the farm should be established: information for large farms should include: presence of protected areas in the locality of the farm; details of any legally protected, red-list, rare, endangered or endemic species in and around the farm including population and habitat requirements; identification of the range of habitats and ecosystems within the farm; an understanding of important local conservation issues; for individual smallholders, a basic understanding of any important local conservation issues, species or habitats will be sufficient 3.3.2: a plan to maintain and increase biodiversity in and around the farm should be developed and implemented; for large farms and groups there must be a documented plan whereas for individual smallholders, a more informal verbally-communicated plan may be adequate	13b: a key aim must be the enhancement of environmental biodiversity on the farm through a conservation management plan; this could be a regional activity rather than an individual one

	American Tree Farm System	Basel Criteria for Responsible Soy Production	EUREPGAP
Soil	5: forestry practices maintain or enhance the environment, including air, water, soil, and site quality	2.1.1: soil suitability maps or soil surveys should be appropriate to the scale of operation and should include information on soil types, topography, rooting depth, moisture availability, stoniness and fertility; this information should be used to plan rotations, planting programmes, etc. 2.1.2: fertiliser application, using either mineral or organic fertilisers, should be sufficient to maintain soil fertility whilst not exceeding the needs of the crop; quantity of fertiliser applied and timing of fertiliser application should be carefully considered so as to maximise benefits and minimise losses of fertiliser; records should be kept of all applications of fertilizer; crop rotations (including pasture) should be used as appropriate to maintain soil condition, reduce reliance on agrochemicals and to maximise plant health; where rotations are not employed, adequate justification must be provided 2.1.3: field cultivation techniques that minimise soil erosion should be adopted; mechanical cultivation should be used only where proven to improve or maintain soil structure, and to avoid soil compaction 2.4.2: after harvest, residue should be retained where soil erosion risk is significant or a cover crop or rotation crop should be planted. Burning should not be used to remove residues	4b: maintain soil condition, reduce reliance on agrochemicals and maximise plant health, growers must recognise the value of crop rotations and seek to employ these whenever practicable; where rotations are not employed, growers must be able to provide adequate justification 5c: field cultivation techniques that minimise soil erosion must be adopted 5e: for substrates that are not inert, documents must demonstrate its suitability

	American Tree Farm System	**Basel Criteria for Responsible Soy Production**	**EUREPGAP**
Agrochemical	5.2: application of forest chemicals must not exceed the levels necessary to achieve specific management objectives 5.2.1: chemicals are applied only when necessary to meet specific management objectives 5.2.2: management plans consider integrated pest management as a preferred means of controlling insect pests, pathogens, and vegetative competition 5.2.3: chemicals are applied in accordance with EPA-approved labels and meet or exceed all human health and environmental safety requirements on the label, and in local, state, and federal law	2.2.1: growers should apply recognised ICP/IPM techniques on a preventive basis; non-chemical pest treatments are preferred over chemical treatments. all use of chemicals should be justified; protection of crops against pests, diseases and weeds should be achieved with the appropriate minimum pesticide input; there should be a plan to reduce pesticide use wherever possible; selective products that are specific to the target pest, weed or disease and which have minimal effect on other organisms, workers and consumers should be used where available 2.2.1: growers should only use chemicals that are officially registered in the country of use and are registered for use on the crop that is to be protected where such official registration scheme exists, or, in its absence, complies with the specific legislation of the country of destination; a list of all products that are approved for use on soy should be kept and regularly updated 2.3.1: use of chemicals which are banned in the countries purchasing the soy products should also be avoided; records of chemical use should be maintained and periodically assessed to ensure that use is stable or decreasing 2.3.1: agrochemicals should only be applied by qualified persons who have received the necessary training and should always be applied in accordance with the product label 2.3.1: particular precautions should be taken when pesticides are applied aerially to avoid drift into water bodies (springs, streams etc), natural vegetation, human settlements and other land uses 2.3.1: growers and/or suppliers should be able to provide evidence of residue testing	3e #5: pesticide treatments applied during the plant rearing stage must be recorded 5d #1: chemical fumigation of soils must be justified 5e #4: where chemicals are used to sterilise substrates for reuse, date, type of chemical used, method of sterilisation and operator must be kept 6a #3: fertiliser application, using either mineral or organic fertilisers, must meet the needs of the crops as well as maintaining soil fertility 6c #1: all applications of soil and foliar fertilisers must be recorded in a crop diary or equivalent; records must include: location, date of application, type and quantity of fertiliser applied, the method of application, and operator 6d #2: any application of nitrogen in excess of national or international limits must be avoided 6e #1: fertiliser application machinery must be kept in good condition, with annual calibration to ensure accurate delivery of the required quantity of fertiliser 6f #3: fertilisers must be stored covered in a clean, dry location where there is no risk of contamination of water sources; fertilisers must not be stored with nursery stock 10a #4: a current list of all products that are used and approved for use on crops being grown must be kept; this list must take account of any changes in pesticide legislation; chemicals that are banned in the European Union must not be used on crops destined for sale in the European Union 8c #3: quantity of spray mix calculation must consider: velocity of application, surface area to be covered, pressure of application system. 8d #1: all applications of pesticides must always include: crop name, location, date of application, trade name and name of operator; pesticide application records must also include: reason for application, technical authorisation, quantity of pesticide used, application machinery used and pre-harvest interval 8k #4: pesticide store must be able to retain spillage (e.g. to prevent contamination of water courses); empty containers must be kept secure until disposal is possible; obsolete pesticides must only be disposed of through a certified or approved chemical waste contractor or supplying company

	American Tree Farm System	Basel Criteria for Responsible Soy Production	EUREPGAP
Water	5: forestry practices maintain or enhance the environment, including air, water, soil, and site quality	2.1.4: water courses, wetlands and swamps should be protected, including maintaining appropriate riparian buffer zones along all bodies of water; contamination of surface and ground water through run-off of soil, nutrients or chemicals, or as a result of inadequate disposal of waste, should be avoided 2.1.5: untreated sewage water should never be used for irrigation; water supply for field irrigation should be sustainable and efficient; plans for water management, appropriate to the scale of use, should be developed to optimise water usage and reduce waste and ensure that the effects of water use on local water resources (groundwater and surface water) are sustainable 3.4.1: hazardous chemicals are stored and disposed of in an appropriate way; fertilisers, pesticides and oil must be stored covered in a clean, dry location able to contain spillage where there is no risk of contamination of water sources and separate from other materials; surplus spray mix, oil, and chemical containers should be disposed of in an environmentally responsible way (e.g., returned to the vendor) with no risk of contamination of water sources or to human health	4a #5: a corrective action plan must be developed setting out strategies to minimise all identified risks in new agricultural sites, such as spray drift or water table contamination 6f #3: fertilisers must be stored covered in a clean, dry location where there is no risk of contamination of water sources 7c #1: Untreated sewage water must never be used for irrigation 8k #4: pesticide store must be able to retain spillage (e.g. to prevent contamination of water courses) recommendations see 7
GHG			
Air Pollution	5: forestry practices maintain or enhance the environment, including air, water, soil, and site quality	3.4.1: waste and pollution should be minimised and properly managed 3.4.1: all medium and large operations should have a strategy for minimising waste and pollution, while for smallholders the approach can be more informal provided that the outcome is acceptable; a strategy for minimising waste should include: sources of waste and pollution are identified, all the possible waste products (e.g. paper, cardboard, plastic, crop debris, oil, rock wool and other substrates) and pollutants (e.g. chemicals, oil, fuel, noise, light, debris, packhouse effluent, etc.) should be identified in all areas of the farm business	

	American Tree Farm System	**Basel Criteria for Responsible Soy Production**	**EUREPGAP**
GMO		2.3.1: seed material must be from non-GMO strains; grower should provide certificates of origin and affidavits covering all seed purchased 2.3.1: where machinery (including planters, harvesters, transporters, etc) is shared with other producers who may be using GMO strains, all machinery should be thoroughly cleaned before use 2.3.1: soybean harvest should not contain GMO residues greater than the limits set by the purchaser and should always be within EU limits	3f #2: use of GMO cultivars must be agreed with individual customers prior to planting 3f #3: suppliers must inform all customers of any developments relating to the use or production of products derived from genetic modification before engagement

	FSC	**PEFC**
Basis	All national FSC standards and all FSC forest management certifications fulfill the international FSC principles and criteria.	The criteria of all national PEFC standards and all endorsed schemes shall be compatible and consistent with the Pan-European Operational Level Guidelines for Sustainable Forest Management (MCPF Lisbon 1998).
Biodiversity	6: forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest 6.2: safeguards shall exist which protect rare, threatened and endangered species and their habitats; conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources; inappropriate hunting, fishing, trapping and collecting shall be controlled 6.3 Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. 6.4 Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources. 6.5 Written guidelines shall be prepared and implemented to: control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; 6.9: use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts 6.10: forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: a) entails a very limited portion of the forest management unit; and b) does not occur on high conservation value forest areas; and c) will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit 9. Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high con-	4.2 a. Natural regeneration should be preferred, provided that the conditions are adequate to ensure the quantity and quality of the forests resources and that the existing provenance is of sufficient quality for the site. 4.2 b. For reforestation and afforestation, origins of native species and local provenances that are well adapted to site conditions should be preferred, where appropriate. Only those introduced species, provenances or varieties should be used whose impacts on the ecosystem and on the genetic integrity of native species and local provenances have been evaluated, and if negative impacts can be avoided or minimized. 4.2 c. Forest management practices should, where appropriate, promote a diversity of both horizontal and vertical structures such as uneven-aged stands and the diversity of species such as mixed stands. Where appropriate, the practices should also aim to maintain and restore landscape diversity. 4.2 e. Tending and harvesting operations should be conducted in a way that does not cause lasting damage to ecosystems. Wherever possible, practical measures should be taken to improve or maintain biological diversity. 4.2 f. Infrastructure should be planned and constructed in a way that minimizes damage to ecosystems, especially to rare, sensitive or representative ecosystems and genetic reserves, and that takes threatened or other key species - in particular their migration patterns - into consideration. 4.2 g. With due regard to management objectives, measures should be taken to balance the pressure of animal populations and grazing on forest regeneration and growth as well as on biodiversity. 4.2 h. Standing and fallen dead wood, hollow trees, old groves and special rare tree species should be left in quantities and distribution necessary to safeguard biological diversity, taking into account the potential effect on health and stability of forests and on surrounding ecosystems. 4.2 i. Special key biotopes in the forest such as water sources, wetlands, rocky outcrops and ravines should be protected or, where appropriate, restored when damaged by forest practices.

	FSC	PEFC
	servation value forests shall always be considered in the context of a precautionary approach. 10.2: [plantations:] design and layout of plantations should promote the protection, restoration and conservation of natural forests, and not increase pressures on natural forests; wildlife corridors, streamside zones and a mosaic of stands of different ages and rotation periods, shall be used in the layout of the plantation, consistent with the scale of the operation; scale and layout of plantation blocks shall be consistent with the patterns of forest stands found within the natural landscape 10.4: [plantations:] selection of species for planting shall be based on their overall suitability for the site and their appropriateness to the management objectives; in order to enhance the conservation of biological diversity, native species are preferred over exotic species in the establishment of plantations and the restoration of degraded ecosystems; exotic species, which shall be used only when their performance is greater than that of native species, shall be carefully monitored to detect unusual mortality, disease, or insect outbreaks and adverse ecological impacts 10.5: [plantations:] proportion of the overall forest management area, appropriate to the scale of the plantation and to be determined in regional standards, shall be managed so as to restore the site to a natural forest cover 10.7: [plantations:] measures shall be taken to prevent and minimize outbreaks of pests, diseases, fire and invasive plant introductions; integrated pest management shall form an essential part of the management plan, with primary reliance on prevention and biological control methods rather than chemical pesticides and fertilizers 10.8: [plantations:] no species should be planted on a large scale until local trials and/or experience have shown that they are ecologically well-adapted to the site, are not invasive, and do not have significant negative ecological impacts on other ecosystems	
Soil	6.5: written guidelines shall be prepared and implemented to: control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances 10.6: [plantations:] measures shall be taken to maintain or improve soil structure, fertility, and biological activity; techniques and rate of harvesting, road and trail construction and maintenance, and the choice of species shall not result in long term soil degradation	5.1.a. Forest management planning should aim to maintain and enhance protective functions of forests for society, such as protection from […] soil erosion […] and from adverse impacts of water such as floods or avalanches. 5.2.a. Special care should be given to silvicultural operations on sensitive soils and erosion prone areas as well as on areas where operations might lead to excessive erosion of soil into watercourses. Inappropriate techniques such as deep soil tillage and use of unsuitable machinery should be avoided on such areas. Special measures to minimize the pressure of animal population on forests should be taken. 5.2.c. Construction of roads, bridges and other infrastructure should be carried out in a manner that minimizes bare soil exposure […].

	FSC	**PEFC**
Agrochemical	6.6: promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited if chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks 6.7: chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations 10.7: [plantations:] plantation management should make every effort to move away from chemical pesticides and fertilizers, including their use in nurseries	2.2. c. The use of pesticides and herbicides should be minimized, taking into account appropriate silvicultural alternatives and other biological measures. 2.2 d. In case fertilizers are used they should be applied in a controlled manner and with due consideration to the environment. 5.2. b. […] Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way should be avoided.
Water	6.5: written guidelines for the protection of water resources shall be prepared 10.6: techniques and rate of harvesting, road and trail construction and maintenance, and the choice of species shall not result in adverse impacts on water quality, quantity or substantial deviation from stream course drainage patterns	5.1. a. Forest management planning should aim to maintain and enhance protective functions of forests for society, such as protection […] of water resources and from adverse impacts of water such as floods or avalanches. 5.2. b. Special care should be given to forest management practices on forest areas with water protection function to avoid adverse effects on the quality and quantity of water resources. Inappropriate use of chemicals or other harmful substances or inappropriate silvicultural practices influencing water quality in a harmful way should be avoided. 5.2 c. Construction of roads, bridges and other infrastructure should be carried out in a manner that […] avoids the introduction of soil into waters ources and that preserve the natural level and function of water courses and river beds. Proper road drainage facilities should be installed and maintained.
GHG		
Air Pollution		
GMO	6.8: use of biological control agents shall be documented, minimized, monitored and strictly controlled in accordance with national laws and internationally accepted scientific protocols; use of genetically modified organisms shall be prohibited	

	FLP	FLO
Biodiversity	8.7: special attention must be given to the protection of the fauna and flora inside the farm and the surrounding areas 8.23: to protect the surroundings and to encourage wildlife, trees and bushes should be planted especially at the farm's boundaries	3.1.2.2: The organization ensures that its members have identified conservation areas,buffer zones around water bodies and watershed recharge areas appropriate to the region, which will not be cultivated and to which agrochemicals will not be applied. 3.1.2.3: new planting in virgin forest areas is prohibited 3.1.2.4: buffer zones are maintained as required to protect water bodies and watershed recharge areas, virgin forests, and/or other legally protected areas and to protect agricultural plots from potentially polluting sources such as roads. 3.1.2.5: in operations in areas of low biodiversity, where buffer zones are bare or undifferentiated from cash crops or in areas not suitable for cultivation, members should plant trees/bushes or otherwise encourage regeneration of natural flora and fauna. 3.5.1.1: The organization ensures that its members use fire to clear or prepare land for production only if it is known that this is the preferred ecological option.
Soil	8.2: a programme has to be elaborated by the company for conserving the environment and the sustainable use of natural resources (water, soil, air) 8.3: organic fertilizer and composted organic waste should be used for the improvement and care of the soil in the plantations in order to reduce chemical fertilizer input	3.4.1.1: members undertake procedures and practices designed to reduce and/or prevent soil erosion caused by wind, water, and/or human or animal impact 3.4.1.2: members undertake procedures and practices designed to enhance fertility and soil structure 3.4.1.3: producer ensures that water management, tillage practices, and/or use of irrigation water does not lead to or contribute to contamination of water supplies, excessive salinization of soil or desertification
Agrochemical	8.1: pollution of soil, water and air with pesticides, fertilizers, chemicals and waste must be avoided wherever possible 8.8: Wildlife Toxicity has to be taken into account, especially when spraying pesticides in the open field 8.16: waste of all kinds, especially pesticide, fertilizer and chemical residues, must not be disposed of into the soil, drains and watercourses; pesticide residues should be diluted (e.g. 1:10) and sprayed under the crops inside the greenhouses 8.17: empty pesticide or chemical containers or drums must be triple rinsed at a safe place before returning to the supplier; if returning is not possible, containers must be punctured after being cleaned and should be disposed off by incineration or burial, taking all precautions for the environment and health and strictly controlled; the re-use of pesticide and chemical containers and drums for drinking water or food storage is strictly prohibited	3.2.1.1: Materials List may not be used or otherwise sold, handled, or distributed by the organization *(FLO publishes a list of materials that cannot be used, comprising data from the WHO Class I A&B, PAN's 'Dirty Dozen' and FAO/ UNEP Prior Informed Consent Procedure Lists plus FLO specific additional materials, the FLO Prohibited Materials List is an integral part of this standard) 3.2.1.2: agrochemicals are used, handled and stored correctly according to their specific characteristics (toxicity) in order to avoid danger to people and the environment; agrochemicals are applied only by trained persons 3.2.1.4: agrochemicals are only used for the crops for which they are specifically labelled and/or registered in the producer's country 3.2.1.5: safe storage and disposal of all agrochemicals and their containers 3.2.1.6: areas for preparing agrochemicals for use are equipped to handle spills and other mishandling effectively (for example with absorbent material); spills must not be allowed to seep into soil or water supplies 3.2.1.7: written record of all agrochemicals purchased, used and disposed of

	FLP	**FLO**
Water	8.6: special and effective measures have to be taken to protect drinking water sources, springs, ground water, surface water, rivers, dikes and lakes have to be taken 8.9: for the supply of irrigation water the company must implement an environmental water management system, which minimizes water consumption and conserves ground and surface water. 8.10: consumption of water and energy has to be recorded and documented for the various greenhouses and sectors 8.11: irrigation must be done with methods and systems minimizing water consumption as far as possible (e.g. drip irrigation, water application direct to the root zone etc.) and by using adequate measuring and controlling methods (tensiometers etc.). 8.12: where possible rainwater should be collected in water reservoirs of adequate capacity; lowering of the ground water level or any other negative effect on the availability and quality of drinking and irrigation water for the surrounding communities and farmers must be avoided 8.20: all wastewater, especially those contaminated with pesticides and/or chemicals have to be specially treated (e.g. setting basins, carbon filters, chemical detoxification with sodium-hypochloride NaOCl) before safe disposal in accordance with the law	3.2.1.8: avoid of air spraying of agrochemicals over rivers and other water sources of significant size 3.4.1.4: use of irrigation methods and systems that minimize water consumption as much as is feasible for the operation in question 3.4.1.5: use of water for processing operations in the most efficient manner possible 3.4.1.6: avoid of the lowering of the groundwater level or any other negative effect on the availability and quality of drinking and irrigation water for the surrounding communities and farmers 3.4.1.7: waste water is handled in a manner that does not have a negative impact on water quality, soil health and structure or food safety 3.4.1.8: discharge of waste water from any system with which the organization or its members are involved in a way that does not: · pollute water that might be used as part of a human or animal drinking supply · contaminate soil or crops with chemicals or their by-products · contaminate crops or soil with excessive nutrients or contaminate harvestable crops with pathogenic microbes, attention should be paid to the judicious handling of animal manures near water bodies or flows
GHG		
Air Pollution	8.14: waste and pollution reduction must be given high priority 8.21: air pollution and unpleasant smells due to pesticide or chemical application or incineration in the open air near housings must be strictly avoided	3.3.2.1: The organization ensures that ist members do not burn waste if there is an environmentally less damaging alternative.
GMO		3.6.1.1 The organization ensures that its members do not grow any GMO products. 3.6.1.2. monitoring of possible GMO usage by neighbours and where necessary additional precautions to ensure that their crops or any seed or propagation material saved for future plantings are not contaminated by GMO traits 3.6.1.3: no use of any products derived from GMOs in primary production or in processing 3.6.1.4. inputs, processing aids, and ingredients are traced back one step in the biological chain to the direct source organism from which they are produced to ensure that they are no longer regarded as GMOs

	Green Gold Label Program	IFOAM	RSPO
Biodiversity	2: agriculture management system is based on land-resource planning: collection and continuous monitoring of utilization of natural resources and living conditions are used for the land resource planning, data about; climate, water and soil, land use, vegetation cover and distribution, animal species, utilization of wild plants	2.1.1: Operators shall take measures to maintain and improve landscape and enhance biodiversity quality. 2.1.2 :Clearing of primary ecosystems is prohibited. 2.2.2 Land preparation by burning vegetation shall be restricted to the minimum. 2.4.1 . Wild harvested products shall only be certified organic if they are derived from a stable and sustainable growing environment. The people who harvest, gather, or wildcraft shall not take any products at a rate that exceeds the sustainable yield of the ecosystem, or threaten the existence of plant, fungal or animal species, including those not directly exploited. 4.1.2 Operators shall use organic seed and plant material of appropriate varieties and quality. 4.3.1 Diversity in plant production and activity shall be assured by minimum crop rotation requirements and/or variety of plantings. Minimum rotation practices for annual crops shall be established unless the operator demonstrates diversity in plant production by other means. Operators are required to manage pressure from insects, weeds, diseases and other pests, while maintaining or increasing soil organic matter, fertility, microbial activity and general soil health. 4.3.2 For perennial crops, the certifying body shall set minimum standards for orchard/plantation floor cover and/or diversity or refuge plantings in the orchard.	5.1: aspects of plantation and mill management that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement 5.2: status of rare, threatened or endangered species and high conservation value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and their conservation taken into account in management plans and operations 5.5: use of fire for waste disposal and for preparing land for replanting is avoided except in specific situations, as identified in the ASEAN guidelines or other regional best practice 7.3: new plantings since November 2005 (which is the expected date of adoption of these criteria by the RSPO membership), have not replaced primary forest or any area containing one or more High Conservation Values
Soil	3.3: general planning, management and utilization of land resources and the preservation of soil fertility are defined and executed 4.5: measures have to be taken to minimize soil run-of and sedimentation	2.2.1 All operators shall take defined and appropriate measures to prevent erosion. 2.2.3 Crop production, processing and handling systems shall return nutrients, organic matter and other resources removed from the soil through harvesting by the recycling, regeneration and addition of organic materials and nutrients. 2.2.4 Grazing management shall not degrade land or pollute water resources. 2.2.5 Relevant measures shall be taken to prevent or remedy soil and water salinization.	4.2: practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield. 4.3: practices minimise and control erosion and degradation of soils 7.2: soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations 7.4: extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided

	Green Gold Label Program	**IFOAM**	**RSPO**
Agrochemical	5: management system is based on an integrated system of pest control: use of banned pesticides is prohibited, use of restricted pesticides is controlled and a administration is kept up to date, stock is kept in a separate and locked storage, biological control agents and organic pesticides, as well as traditional knowledge and skills regarding alternatively non-chemical pest control have to be identified and implemented in the agricultural management system 6.1: management plan is based on an integrated plant nutrition approach 6.2: availability of fertilizer and other plant nutrient resources are optimized	4.4.2 Nutrients and fertility products shall be applied in a way that protects soil, water, and biodiversity. Restrictions may be based on amounts, location, timing, treatments, methods or choice of inputs applied. 4.4.4 Manures containing human excrement (feces and urine) are prohibited for use on crops for human consumption. Exceptions may be made where detailed sanitation requirements are established by the standardsetting organization to prevent the transmission of pests, parasites and infectious agents and to ensure that manures are not mixed with other household or industrial wastes that may contain prohibited substances. 4.4.5 Mineral fertilizers shall only be used in a program addressing longterm fertility needs together with other techniques such as organic matter additions, green manures, rotations and nitrogen fixation by plants. 4.4.6 Mineral fertilizers shall be applied in the form in which they are naturally composed and extracted and shall not be rendered more soluble by chemical treatment, other than addition of water and mixing with other naturally occurring, permitted inputs. Under exceptional circumstances, and after consideration of all relevant information, and having regard to Appendix 1, the standardsetting organizations may grant exception to this requirement. These exceptions shall not apply to mineral fertilizers containing nitrogen. 4.4.7 Chilean nitrate and all synthetic nitrogenous fertilizers, including urea, are prohibited. 6.4.1 A handler or processor is required to manage pests and shall use the following methods according to these priorities: a . preventative methods such as disruption, elimination of habitat and access to facilities; b . mechanical, physical and biological methods; c . substances according to the Appendices of the IFOAM Basic Standards; d . substances (other than pesticides) used in traps. 6.4.2 Prohibited pest control practices include, but are not limited to, the following substances and methods: a . pesticides not contained in Appendix 3; b . fumigation with ethylene oxide, methyl bromide, aluminum phosphide or other substance not contained in Appendix 4; c . ionizing radiation. 6.4.3 The direct use or application of a prohibited method or material renders that product no longer organic. The operator shall take necessary precautions to prevent contamination, including the removal of organic product from the storage or processing facility, and measures to decontaminate the equipment or facilities. Application of prohibited substances to equipment or facilities shall not contaminate organic product handled or processed therein. Application of prohibited substances to equipment or facilities shall not compromise the organic	4.6: agrochemicals are used in a way that does not endanger health or the environment 4.6: no prophylactic use, and where agrochemicals are used that are categorised as World Health Organisation Type 1A or 1B, or are listed by the Stockholm or Rotterdam Conventions, growers are actively seeking to identify alternatives, and this is documented

	Green Gold Label Program	IFOAM	RSPO
		integrity of product handled or processed therein.	
Water	4.1: efficiency and productivity of agricultural water use for better utilization of limited water resources has to increase 4.2: monitoring of the irrigation performance 4.4: water quality has to be monitored on biological, physical and chemical quality 4.6: Irrigation has to be planned in a long term program 4.7: long term strategies and implementation program have to be developed on water use under scarce conditions 4.8: waste water re-use has to be part of the agriculture management system	2.2.4 Grazing management shall not degrade land or pollute water resources. 2.2.5 Relevant measures shall be taken to prevent or remedy soil and water salinization. 2.2.6 Operators shall not deplete nor excessively exploit water resources, and shall seek to preserve water quality. They shall where possible recycle rainwater and monitor water extraction. 2.4.5 Operators shall take measures to ensure that wild, sedentary aquatic species are collected only from areas where the water is not contaminated by substances prohibited in these standards.	4.4: practices maintain the quality and availability of surface and ground water
GHG			5.6: plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored
Air Pollution			5.3: waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner 5.6: plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored

	Green Gold Label Program	**IFOAM**	**RSPO**
GMO		2.3.1 The deliberate use or negligent introduction of genetically engineered organisms or their derivatives to organic farming systems or products is prohibited. This shall include animals, seed, propagation material, and farm inputs such as fertilizers, soil conditioners, vaccines or crop protection materials. 2.3.2 The use of genetically engineered organisms or their derivatives is prohibited. This shall include animals, seed and farm inputs such as fertilizers, soil conditioners, vaccines or crop protection materials. 2.3.3 The use of genetically engineered seeds, pollen, transgene plants or plant material is not allowed. 2.3.4 Organic processed products shall not use ingredients, additives or processing aids derived from GMOs. 2.3.5 Inputs, processing aids and ingredients shall be traced back one step in the biological chain to the direct source organism *(see definition) from which they are produced to verify that they are not derived from GMOs. 2.3.6 Contamination of organic product by GMOs that results from circumstances beyond the control of the operator may alter the organic status of the operation and/or product. 2.3.7 On farms with split (including parallel) production, the use of genetically engineered organisms is not permitted in any production activity on the farm.	Preamble: there is no genetically modified (GM) palm oil available in the market, and there will not be for many years to come: hence no criterion on GM oil palm is included

	Sustainable Agricultural Standards	SFIS	Utz Kapeh Codes of Conduct
Biodiversity	all existing natural ecosystems, both aquatic and terrestrial, must be identified, protected, conserved and restored through a conservation program; the program must include the restoration of natural ecosystems or the reforestation of areas within the farm that are unsuitable for agriculture, the program must include the establishment and maintenance of shade trees for those crops traditionally grown with shade, in areas where the agricultural, climatic and ecological conditions permit farm must maintain the integrity of aquatic or terrestrial ecosystems inside and outside of the farm, and must not permit their destruction or alteration as a result of management or production activities on the farm production areas must not be located in places that could provoke negative effects on national parks, wildlife refuges, biological corridors, forestry reserves, buffer zones or other public or private biological conservation areas cutting, extracting or harvesting trees, plants and other non-timber forest products is only allowed in instances when the farm implements a sustainable management plan that has been approved by the relevant authorities, and has the all the permits required by law; if no applicable laws exist, the plan must have been developed by a competent professional; harvesting of threatened or endangered plants or species is not permitted; certification of farms that have areas that have deforested within the two years prior to the first moment of contact regarding certification is not permitted minimum separation of production areas from natural ecosystems where chemical products are not used; vegetated protection zone must be established by planting or by natural regeneration between different permanent or semi-permanent crop production areas or systems; the farm must establish and maintain vegetation zones between the crop and areas of human activity, as wells as between production areas and on the edges of public or frequently traveled roads passing through or around the farm; these zones must consist of permanent native vegetation with trees, bushes or other types of plants, in order to promote biodiversity, minimize any negative visual impacts and reduce the drift of agrochemicals, dust and other substances coming from agricultural or processing activities inventory of wildlife and wildlife habitats found on the farm must be created and maintained; ecosystems that provide	4.1: Program Participants shall have programs to promote biological diversity at stand and landscape levels: 1. Program to promote the conservation of native biological diversity, including species, wildlife habitats, and ecological or natural community types, at stand and landscape levels. 2. Program to protect threatened and endangered species. 3. Plans to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities. Plans for protection may be developed independently or collaboratively and may include Program Participant management, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies. 4. Development and implementation of criteria, as guided by regionally appropriate science, for retention of stand-level wildlife habitat elements (e.g., snags, mast trees, down woody debris, den trees, nest trees). 5. Assessment, conducted individually or collaboratively, of forest cover types and habitats at the individual ownership level and, where credible data are available, across the landscape, and incorporation of findings into planning and management activities, where practical and when consistent with management objectives. 6. Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership. 7. Participation in programs and demonstration of activities as appropriate to limit the introduction, impact, and spread of invasive exotic plants and animals that directly threaten or are likely to threaten native plant and animal communities. 8. Program to incorporate the role of prescribed or natural fire where appropriate. 4.2: Program Participants shall apply knowledge gained through research, science, technology, and field experience to manage wildlife habitat and contribute to the conservation of biological diversity: 1. Collection of information on critically imperiled and imperiled species and communities and other biodiversity-related data through forest inventory processes, mapping, or participation in external programs, such as NatureServe, state or provincial heritage programs, or other credible systems. Such participation may include providing nonproprietary scientific information, time, and assistance by staff, or in-kind or direct financial support. 2. A methodology to incorporate research results and field	11.B.1: deforestation is prohibited 11.B.2: comply with the relevant local and national regulations with respect to land use and bio-diversity conservation for all new plantings 11.B.5: conserve all the forest patches that are not used for coffee plantings 11.B.7: shade trees should preferably be native tree species 11.B.10: allow native vegetation to grow along water streams to control erosion, filter out agrochemicals and protect the wildlife habitat 11.B.11: protect threatened and endangered species and habitats, and take adequate measures to restrict hunting or commercial collection of flora and fauna on the farm

	Sustainable Agricultural Standards	**SFIS**	**Utz Kapeh Codes of Conduct**
	habitats for wildlife living on the farm, or that pass through the farm during migration, must be protected and restored; farm takes special measures to protect threatened or endangered species hunting, capturing, extracting and trafficking wild animals must be prohibited on the farm. Cultural or ethnic groups can hunt or collect fauna in a controlled manner and in areas designated for those purposes under the special conditions farmer must keep an inventory of the wild animals held in captivity on the farm, and implement policies and procedures to regulate and reduce their tenancy endangered or threatened species must not be held in captivity farm is allowed to breed wild animals in captivity when the farm has the required conditions and the permits stipulated law farms that reintroduce wildlife into natural habitats must have the appropriate permit from the relevant authorities and comply with the conditions established by law, or reintroduce the animals via duly authorized and established programs exotic wildlife must not be introduced into the farm.	applications of biodiversity and ecosystem research into forest management decisions.	
Soil	9.1: farm must execute a soil erosion prevention and control program that minimizes the risk of erosion and reduces existing erosion; program activities must be based on the identification of soils affected by or susceptible to erosion, as well as soil properties and characteristics, climatic conditions, topography and agricultural practices for the crop 9.2: farm must have a soil or crop fertilization program based on soil characteristics and properties, periodic soil or foliage sampling and analysis, and advice from a competent and impartial professional or authority; number of soil or foliage samples must correspond with the size of the production area, types of soil, and variations in its properties, as well as results of previous analyses; producer must keep analyses results on the farm for a two-year period; organic and non-organic fertilizers must be applied so as to avoid any potential negative impacts on the environment; farm must give priority to organic fertilization using residues generated by the farm 9.3: farm must use and expand its use of vegetative ground cover to reduce erosion and improve soil fertility, structure and organic material content, as well as minimize the use of herbicides; there must be a vegetative ground cover establishment and expansion plan that indicates the areas with existing cover, as well as areas	2.3: Program Participants shall implement management practices to protect and maintain forest and soil productivity: 1. Use of soils maps where available. 2. Process to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance. 3. Use of erosion control measures to minimize the loss of soil and site productivity. 4. Post-harvest conditions conducive to maintaining site productivity (e.g., limited rutting, retained down woody debris, minimized skid trails). 5. Retention of vigorous trees during partial harvesting, consistent with silvicultural norms for the area. 6. Criteria that address harvesting and site preparation to protect soil productivity. 7. Minimize road construction to meet management objectives efficiently.	4.A.2: use of techniques to maintain, improve and prevent the loss of soil structure and fertility, using e.g. shade trees, compost, cover crops, nitrogen fixing plants, mulching, etc. 4.A.2: compost made of coffee by-products should be completely decomposed before use to prevent mould formation and loss of nitrogen in the soil 4.A.3: use of techniques to prevent soil erosion, e.g. cross line planting on slopes, drains, sowing grass, trees and bushes on borders of sites, mulching etc.

	Sustainable Agricultural Standards	SFIS	Utz Kapeh Codes of Conduct
	where cover will be established in the future 9.4: farm must promote the use of fallow areas with natural or planted vegetation in order to recover natural fertility and interrupt pest life cycles; farm must have a plan that indicates the fallow techniques or practices and their timing; these areas must be identified in the fields and on the farm map; burning is not allowed to prepare land 9.5: new production areas must only be located on land with the climatic, soil and topographic conditions suitable for intensity level of the agricultural production planned; establishment of new production areas must be based on land use capacity studies that demonstrate long-term production capacity; cutting of natural forest cover or burning to prepare new production areas is not permitted		
Agrochemical	8.1: integrated pest-management program based on ecological principles for the control of harmful pests (insects, plants, animals and microbes). The program must give priority to the use of physical, mechanical, cultural and biological control methods, and the least possible use of agrochemicals, program must include activities for monitoring pest populations, training personnel that monitor these populations, and integrated pest management techniques; farm must collect and record the detailed information about pest infestations 8.2: farm must demonstrate by agrochemical inventories and use records that it rotates chemical products and reduces their use for crop production 8.3: farm must implement the procedures and have the necessary equipment for mixing and applying agrochemicals, as well as maintain, calibrate and repair application equipment, in order to reduce to a minimum waste and excessive applications; farm must designate and train personnel who will be responsible for the implementation of these procedures 8.4: following chemical or biological substances cannot be used on certified farms: a. Agrochemicals or biological or organic substances that are not legally registered in the country for use on that particular crop. b. Agrochemicals that are prohibited by the United States Environmental Protection Agency (EPA) or by the European Union. c. Substances that have been identified as Persistent Organic Pollutants (POP) in the Stockholm agreement (www.chem.unep.ch/pops/default.html). d. Agrochemicals included in Annex III of the Rotterdam	2.2: minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public, and the forest environment minimized chemical use required to achieve management objectives: use of least-toxic and narrowest-spectrum pesticides necessary to achieve management objectives, use of pesticides registered for the intended use and applied in accordance with label requirements, use of integrated pest management where feasible, supervision of forest chemical applications by state-trained or certified applicators use of best management practices (BMPs), appropriate to the situation; for example: a. Notification of adjoining landowners or nearby residents concerning applications and chemicals used; b. appropriate multilingual signs or oral warnings; c. control of public road access during and immediately after applications; d. designation of streamside and other needed buffer strips; e. use of positive shutoff and minimal-drift spray valves; f. aerial application of forest chemicals parallel to buffer zones to minimize drift; g. monitoring of water quality or safeguards to ensure proper equipment use and protection of streams, lakes, and other water bodies; i. appropriate storage of chemicals; j. filing of required state reports; or k. use of methods to ensure protection of threatened and endangered species.	very detailed requirements for fertilizers and pesticides (see Utz Kapeh Codes of Conduct / Version 2006, nb. 5 and 7), only some important points: estimates of the quantity and type of fertilizer fertilizers are applied judiciously up to date and complete list of all the soil and foliar fertilizers inorganic fertilizer application equipment to ensure accurate fertilizer delivery storage of all inorganic and organic fertilizers in a manner that reduces the risk of contamination of water streams and sources, using a spillage retention system to catch leaking liquid fertilizers, separate from crop protection products to prevent cross contamination and in a secure area no crop protection products that are banned in the European Union, the USA and/or Japan; producer must only use and store crop protection products that are officially registered and permitted in his country for use on coffee; If there is no official registration scheme for crop protection => FAO International Code of Conduct on the Distribution and Use of Pesticides protection of coffee against pests, diseases and weeds must be done with the appropriate minimum input of crop protection product up to date and complete list of all the crop protection products detailed list of requirements for the storage of pesticides, the mixing, the transport of pesticides and the disposal of the empty pesticide containers

	Sustainable Agricultural Standards	**SFIS**	**Utz Kapeh Codes of Conduct**
	agreement that are prohibited or severely restricted by the United Nation Environmental Program's Prior Informed Consent (PIC) program (www.pic.int). e. All Pesticide Action Network Dirty Dozen products. 8.5: farm must have a plan for reducing the use of World Health Organization Category I and II products, and for eliminating the use of Category 1 products within three years from the time of certification; farms that use these products must demonstrate the following: 1) no technically or economically viable alternatives exist for that type of infestation; 2) the infestation has had, or would have had, significant economic consequences (that surpass the economic threshold for damage) and, 3) steps are being taken to substitute Category I and II products.		
Water	2.6: natural water channels must be protected by establishing protected zones on the banks of rivers, streams, creeks, lakes, wetlands and around the edges of other natural water bodies; farms must not alter natural water channels to create new drainage or irrigation canals; previously converted water channels must maintain their natural vegetative cover or, in its absence, this cover must be restored 4.1: farm must have a water conservation program that ensures the rational use of water resources 4.1: farm must keep an inventory and indicate on a map the surface and underground water sources found on the property; record of the annual water volume provided by these sources and the amount of water consumed by the farm 4.2: all surface or underground water exploited by the farm for agricultural, domestic or processing purposes must have the respective concessions and permits from the corresponding legal or environmental authorities 4.3: farms that use irrigation must employ mechanisms to precisely determine and demonstrate that the volume of water applied and the duration of the application are not excessive or wasteful; farm must demonstrate that the water quantity and the duration of the application are based on climatic information, available soil moisture, and soil properties and characteristics 4.4: farm must have appropriate treatment systems for all of wastewaters it generates 4.5: farm must not discharge or deposit industrial or domestic wastewater into natural water bodies without demonstrating that the discharged water compiles with the respective legal requirements, and that the wastewater's	see agrochemicals Objective 3: Program Participants shall meet or exceed all applicable federal, provincial, state, and local water quality laws and meet or exceed best management practices developed under U.S. Environmental Protection Agency–approved state water quality programs or other federal, provincial, state, or local programs: 1. Program to implement state or provincial BMPs during all phases of management activities. 2. Contract provisions that specify BMP compliance. 3. Plans that address wet-weather events (e.g.,inventory systems, wet-weather tracts, definitions of acceptable operating conditions). 4. Monitoring of overall BMP implementation. Program Participants shall have or develop, implement, and document riparian protection measures based on soil type, terrain, vegetation, and other applicable factors: 1. Program addressing management and protection of streams, lakes, and other water bodies and riparian zones. 2. Mapping of streams, lakes, and other water bodies as specified in state or provincial BMPs and, where appropriate, identification on the ground. 3. Implementation of plans to manage or protect streams, lakes, and other water bodies. 4. Identification and protection of nonforested wetlands, including bogs, fens, vernal pools, and marshes of significant size. 5. Where regulations or BMPs do not currently exist to protect riparian areas, use of experts to identify appropriate protection measures.	6.A.1: producer should have rainfall records and systematic rainfall forecast methods available to decide on the application of irrigation water 6.B.1: producer uses the most efficient and commercially practical water delivery system to ensure the best utilization of water resources, the producer should show the efficiency of his irrigation system in terms of the amount of water used per MT of coffee produced 6.B.2: producer has records that indicate the date of irrigation, the quantity of water used and where the irrigation water was used 6.C.1: producer should each year assess the risks of phytosanitary, chemical or physical pollution or contamination of irrigation water sources; focus should be on mould prevention, the producer should undertake preventive or corrective actions in case of contamination or pollution, these should be documented 6.D.1: irrigation water is extracted from sustainable sources 9.B.1: water management plan with the objective of (re-)using water efficiently and minimizing the amount of water used in the process 9.B.3: treat the contaminated water coming out of the wet processing unit to minimize the impact on water streams and sources

	Sustainable Agricultural Standards	SFIS	Utz Kapeh Codes of Conduct
	physical and biochemical characteristics do not degrade the receiving water body; if legal requirements do not exist, the discharged wastewater must comply special minimum parameters 4.6: farms that discharge wastewater into the environment must establish a water-quality monitoring and analysis program that takes into account potential contaminants and applicable laws; program must indicate the wastewater sampling points and frequency and the analyses to be carried out; a legally accredited laboratory must conduct all analyses for at least three years 4.7: no deposit into natural water bodies any organic or inorganic solids 4.8: restriction of the use of septic tanks to the treatment of domestic wastewater (gray water and sewage) and non-industrial wastewater to prevent negative impacts on underground or surface water; tanks and their drainage systems must be located in soils suitable for this purpose; wastewater from the washing of machinery used for agrochemical applications must be collected and mus not be mixed with domestic wastewater or discharged to the environment without previous treatment 4.9: if total or partial compliance with the requirements of this standard that relate directly or indirectly to the contamination of natural water bodies cannot be proven, the farm must conduct a surface-water quality monitoring and analysis program; program must indicate the sampling points and frequency, and must be continued until it can be proven that farm activities are not contributing to the degradation of the quality of the receiving water bodies		
GHG			
Air Pollution			11.A.2: management plan with the objective of reducing and/or recycling waste and pollution
GMO	8.6: farm must take steps to avoid introducing, cultivating or processing transgenic crops 8.6: when nearby transgenic materials are accidentally introduced into a certified farm's crop, the farm must develop and execute a plan to isolate the crops and provide follow-up in order to comply with the requirements of this criterion	2.5: Program Participants that utilize improved planting stock, including trees derived through biotechnology, shall use sound scientific methods and follow all applicable laws and international protocols program for appropriate research, testing, evaluation, and deployment of improved planting stock, including trees derived through biotechnology	3.C.1+2: although GMO coffee is currently not commercially available and will probably not be so in the foreseeable future, the producer must comply with all the relevant regulations in the country of production once he is involved in (trial) plantings of GMO coffee and inform his client once he is involved in (trial) plantings of GMO coffee

A-3 Synopsis of Social Standards for Biomass

	FLO (for small farmers and workers)	FSC	FLP
labour conditions	4.3.2.2: legally binding labour contracts 4.3.2.3: all permanent workers having the benefits of a provident fund or pension scheme 4.3.2.4: adequate sick leave regulation 4.3.2.5: working hours and overtime regulation 4.3.2.1: conditions of employment like maternity leave, social security provisions non-monetary benefits, etc. at least the provisions as laid out in the Collective Bargaining Agreement or the Agreement signed between the workers' committee must be fulfilled	compliance with ILO norms	7: not seasonal or temporary work shall be done by workers on permanent contracts; provisions for non-permanent and seasonal workers, including freedom of association, should be not less favourable than for permanent workers; every worker shall get a copy of their contract 4: hours of work shall comply with applicable law and industry standards; no excess of 48 hours work per week, one day off every week, overtime is voluntary and shall not exceed 12 hours per week 10: no forced labour, included bonded or involuntary prison labour (ILO Conventions 29 and 105); workers are not required to lodge „deposits“ or their identity papers with their employer
wages	4.3: wages in line with or exceeding national laws and agreements on minimum wages or the regional average 4.3.1.1: salaries are in line with or exceeding regional average and official minimum wages for similar occupations 4.3.1.2: regularly payment in legal tender and properly documented	compliance with ILO norms	3: wages and benefits meet at least legal or industry minimum standards, sufficient to meet basic needs of workers and their families and to provide some discretionary income; pay should be in cash, direct to the workers, promptly and in full
health	4.4: FLO follows ILO Convention 155 4.4.1.1: Workplaces, machinery and equipment are safe and without risk to health. if reqired: inspections by independent inspection agency 4.4.1.2: not allowed to work with the application of pesticides: persons younger than 18 years, pregnant or nursing women, persons with incapacitated mental conditions; persons with special diseases 4.4.2.2: training in handling agrochemicals: storage, application and disposal, relevant health protection and first aid; information of all relevant information on the products in the local language 4.4.2.3: adequate personal protective equipment 4.4.2.4: Workers' capability and awareness of the chemicals they are using, relevant health protection and first aid are improved through training. 4.4.2.5: occupational health and safety committee with the participation of workers	4.2: Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families	5: comply with internationally recognised health and safety standards (ILO Convention 170); free and appropriate protective clothing and equipment; safe and hygienic working environment; workers and their organisations must be consulted, trained and allowed to investigate safety issues; supply with drinking water, clean toilets and showers and washing facilities; housing should comply at least with the minimum standards for size, ventilation, cooking facilities, water supply and sanitary facilities. (ILO Convention 110, Articles 85-88) 6: assessment of the risks of the chemicals used, measures to prevent any damage to the health of workers; companies shall record and reduce pesticide and fertilizer; no banned, highly toxic (WHO I) or carcinogenic pesticide and chemical; safety instructions and re-entry intervals must be strictly observed and monitored, spraying, handling and storing pesticides and chemicals should be done by specially trained people with suitable equipment

	FLO (for small farmers and workers)	FSC	FLP
child labour	4.1: FLO follows ILO Conventions 29, 105, 138 and 182 on child labour and forced labour 4.1.1.1: Forced or bonded labour must not occur 4.1.1.2: children are not employed (contracted) below the age of 15 4.1.1.3: children may only work if their education is not jeopardised and they do not execute tasks, which are especially hazardous for them due to their age	compliance with ILO norms	9: no use of child labour; no workers under the age of 15 years or under the compulsory school-leaving age; children under 18 shall not work in hazardous conditions (ILO Convention 138); adequate transitional economic assistance and appropriate educational opportunities shall be provided to any replaced child workers
unions	4.2: FLO follows ILO Conventions 87 and 98 on freedom of association and collective bargaining workers and employers shall have the right to establish and to join organisations of their own choosing, and to draw up their constitutions and rules, to elect their representatives and to formulate their programmes workers shall enjoy adequate protection against acts of anti-union discrimination in respect of their employment 4.2.1.1: right to collective bargaining 4.2.2.1: FLO expects that the workers will be represented by trade unions and that the workers will be covered by a Collective Bargaining Agreement (CBA); if no independent and active union exists in the region and the sector, all the worker's will democratically elect a worker's committee	4.3: rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labour Organisation (ILO).	1: rights of all workers to form and join trade unions and to bargain collectively shall be recognised (ILO Conventions 87 and 98); workers representatives shall not be subject of discrimination and shall have access to all workplaces necessary to enable them to carry out their representation functions. (ILO Convention 135)
change of local communities way of life, economy and culture	1.1.1.1: promotion of social and economical development of small farmers 1.2.: members of the fairtrade organisations are small producers; of every Fairtrade-certified product sold by the organisation, more than 50% of the volume must be produced by small producers	4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities 4.1: communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services 4.4: Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations. 4.5: mechanisms for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples, measures shall be taken to avoid such loss or damage 5.4: forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	

	FLO (for small farmers and workers)	FSC	FLP
discrimination	1.4: FLO follows ILO Convention 111 on ending discrimination of workers 1.4.1: restriction of new members may not contribute to the discrimination of particular social groups	compliance with ILO norms	2: access to jobs and training on equal terms, irrespective of gender, age, ethnic origin, colour, marital status, sexual orientation, political opinion, religion or social origin (ILO Conventions 100 and 111); physical harassment or psychological oppression, particularly of women workers, must not be tolerated
land rights		2: long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established 2.2: communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies 2.3: mechanisms to resolve disputes over tenure claims and use rights 3: legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected 3.3: sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers 3.4: indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations	

	ETI	CCC	Basel Criteria for Responsible Soy Production
labour conditions	6.1: working hours comply with national laws and benchmark industry standards 6.2: no exeed of 48 hours per week, at least one day off for every 7 day period on average, overtime is voluntary and shall not exceed 12 hours per week 1.1: no forced, bonded or involuntary prison labour 1.2: workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice 8.1: work performed must be on the basis of recognised employment relationships established through national law and practice 9.1: physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited	no use of forced, including bonded or prison, labour (ILO Conventions 29 and 105) no requirement to lodge "deposits" or identity papers with their employer hours of work shall comply with applicable laws and industry standards no exeed of 48 hours per week, at least one day off for every 7 day period on average, overtime is voluntary and shall not exceed 12 hours per week obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment younger workers shall be given the opportunity to participate in education and training programmes	4.2.1: acceptable pay and conditions; pay and conditions in accordance with national laws and regulations or sector or trade union standards; labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment should be available in the languages understood by the workers or explained carefully to them by a senior company official; access to potable water and segregated sanitary and bathing facilities; if worker is required to live on the farm, then adequate, affordable housing, medical, educational and welfare amenities must be provided 4.3.1: forced labour, including slave labour, debt bondage and exploitation of prison inmates must be prohibited; workers must not be obliged to lodge a 'guarantee payment' or the originals of their identity papers with their employer
wages	5.1: wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards; wages meet basic needs and to provide some discretionary income 5.2: providing of written and understandable information about the workers employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid 5.3: deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned	living wages are paid wages and benefits meet at least legal or industry minimum standards and are sufficient to meet basic needs of workers and their families and to provide some discretionary income no deductions from wages as a disciplinary measure physical abuse, threats of physical abuse, unusual punishments or discipline, sexual and other harassment, and intimidation by the employer is strictly prohibited	4.2: acceptable pay in accordance with national laws and regulations or sector or trade union standards; pay meets or exceeds the national minimum wage or a regional average if no minimum wage exists and must enable an adequate standard of living, a minimum wage should be established and adjusted from time to time in consultation with relevant parties

	ETI	CCC	Basel Criteria for Responsible Soy Production
health	3.1: safe and hygienic working environment; prevent accidents and injury to health arising out of, associated with, or occurring in the course of work 3.2: regular and recorded health and safety training 3.3: access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided 3.4: accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers 3.5: company observing the code shall assign responsibility for health and safety to a senior management representative	safe and hygienic working environment best occupational health and safety practice shall be promoted	4.3.2: safe and healthy working environment; adequate protective equipment should be available to labourers at the place of work to cover all potentially hazardous operations; accident and emergency procedures should exist and instructions should be clearly understood by all workers, workers trained in First Aid should be present in both field and other farm operations and first aid equipment should be available at worksites; records should be kept of all accidents and sick days and periodically reviewed; accident insurance; 4.3.3: training must be given to all workers operating dangerous or complex equipment or substances, for smallholders training records should not be required but anyone working on the farm should be adequately trained for the job they are doing
child labour	4.1: there shall be no new recruitment of child labour 4.3: children and young persons under 18 shall not be employed at night or in hazardous conditions 4.4: conform to the provisions of the relevant ILO standards.	no child labour only workers above the age of 15 years or above the compulsory school-leaving age shall be engaged (ILO Convention 138) adequate transitional economic assistance and appropriate educational opportunities shall be provided to any replaced child workers	4.3.1. child labour [...] should not be used on the farm; only workers above the minimum school leaving age in the country or who are at least 15 years old may be employed; no workers under the age of 18 should conduct hazardous work; adequate transitional economic assistance and appropriate educational opportunities must be offered to any child workers who may have to be dismissed; in places where whole families work together on farms, children and other relatives may work on family-owned and run farms provided that they are not thereby prevented from attending school
unions	2.1: right to join or form trade unions of their own choosing and to bargain collectively 2.2: open attitude towards the activities of trade unions and their organisational activities, workers representatives are not discriminated against and have access to carry out their representative functions in the workplace 2.4: where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining	freedom of association and the right to collective bargaining right of all workers to form and join trade unions and to bargain collectively shall be recognised (ILO Conventions 87 and 98) workers' representatives shall not be the subject of discrimination and shall have access to all workplaces necessary to enable them to carry out their representation functions (ILO Convention 135 and Recommendation 143) employers shall adopt a positive approach towards the activities of trade unions and an open attitude towards their organisational activities.	4.2.2: freedom of association and bargaining; right of employees and contractors to form associations and bargain collectively with their employer, in accordance with Conventions 87 and 98 of the International Labour Organisation

	ETI	CCC	Basel Criteria for Responsible Soy Production
change of local communities way of life, economy and culture			4.1.2: communication and consultation with local communities and other affected or interested parties; should be designed or agreed with local communities and other affected or interested parties 4.1.3: system for dealing with complaints and grievances 4.3.4: growers should deal fairly with local businesses and make efforts to contribute to the local economy wherever possible; maximising local employment, using local goods and services wherever possible, paying for goods and services promptly, supporting, as far as is practical, any projects that improve local infrastructure or facilities; (*This criterion does not apply to individual smallholders)*
discrimination	7.1: no discrimination in hiring compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation	no discrimination in employment. Equality of opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or other distinguishing characteristic shall be provided (ILO conventions 100 and 111)	4.2.3: equality of opportunity for all employees and contractors; grower must ensure equality of opportunity and treatment for all employees and contractors, regardless of race, colour, sex, religion, political opinion, nationality, social origin or other distinguishing characteristics
land rights			4.4.1: right to use the land can be demonstrated and does not diminish the legal or customary rights of other users; proof of ownership or use rights; where there are other potential rights, the grower must demonstrate that these rights are understood and are not being threatened or reduced

	EUREPGAP	Sustainable Agricultural Standards	IFOAM
labour conditions	12f #1: employment conditions must comply with local and national regulations with regard to wages, workers age, working hours, working conditions, job security, unions, pensions and all other legal and health requirements 12f #2: growers and packers must consult with their customers to ensure compliance with specific company policies regarding worker welfare 12f #3: on site living quarters must be habitable and have the basic services and facilities	5.3: direct hire of workforce, except when a contractor is able to provide specialized or temporary services under the same environmental, social and labor conditions required by this standard 5.6: labor contract or collective agreement 5.10: forced labor is prohibited, including working under the regimen of involuntary imprisonment, in agreement with ILO Conventions 29 and 105 and national laws	8.1: operators shall have a policy on social justice; operators who hire fewer than ten (10) persons for labor and those who operate under a state system that enforces social laws may not be required to have such a policy 8.2: in cases where production is based on violation of basic human rights and clear cases of social injustice, that product cannot be declared as organic 8.3: operators not use forced or involuntary labor
wages	see labour conditions	5.4: payment policies and procedures that guarantee the complete payment of workers on the dates agreed upon in the labor contract; payment must take place at the workplace, or by another arrangement agreed upon by the worker; detailed and comprehensive explanation of the salary paid and of any deductions made, allowing the worker to appeal in the case of perceived discrepancies. 5.5: workers must receive pay in legal tender greater than or equal to the regional average or the legally established minimum wage; in cases where the salary is negotiated through collective bargaining or other pact, the worker must have access to a copy of this document during the hiring process; for production, quota or piecework, the established pay rate must allow workers to earn a minimum wage based on an eight-hour workday under average working conditions, or in cases where these conditions cannot be met	
health	8e #1: workers who handle and apply pesticides must be trained 8f #1: workers must be equipped with suitable protective clothing in accordance with label instructions and appropriate to the posed health and safety risks 8f #3: protective clothing and equipment must be stored separately from pesticides 12b #1: formal training must be given to all appropriate workers operating dangerous or complex equipment 12b #4: accident and emergency procedures must exist and instructions must be clearly understood by all workers 12c #1: first Aid boxes must be present at all permanent sites and in the vicinity of field work more details for handling of pesiticides in the EUREPGAP Protocol for Fresh Fruit and Vegetables point 8	5.15: all workers and their families must have access to medical services during working hours and in case of emergency; when legislation requires, farms must contract the services of a doctor or nurse with the necessary equipment to provide these services *very detailed standards on occupational health and safety (see Sustainable Agricultur Standards, point 6)*	

	EUREPGAP	Sustainable Agricultural Standards	IFOAM
child labour		5.8: it is prohibited to directly or indirectly employ full- or part-time workers under the age of 15; in countries where the ILO Conventions have been ratified: Convention 138, Recommendation 146 (minimum age); farms contracting minors between the ages of 15 and 17 must keep a record of the special information for each minor (for details see Sustainable Agricultur Standards); workers between 15 and 17 years old must not work more than eight hours per day or more than 48 hours per week; their work schedule must not interfere with educational opportunities; these workers must not be assigned activities that could put their health at risk 5.9: minors between 12 and 14 years old may work part-time on family farms if they are family members or neighbors in a community where minors have traditionally helped with agricultural work; schedule for these minors including school, transportation and work must not exceed ten hours on school days or eight hours on non-school days, and must not interfere with educational opportunities; special conditions must be fulfilled (for details see Sustainable Agricultur Standards).	8.6 operators shall not hire child labor; children are allowed to experience work on their family's farm or a neighboring farm provided that: a. such work is not dangerous or hazardous to their health and safety; b. it does not jeopardize the children's educational, moral, social, and physical development; c. children are supervised by adults or have authorization from a legal guardian
unions		5.12. right to freely organize and voluntarily negotiate their working conditions in a collective manner as established in ILO Conventions 87 and 98, not impede workers from forming or joining unions, collective bargaining or organizing for ideological, religious, political, economical, social, cultural or any other reasons; periodical opportunities for workers to make decisions regarding their rights and alternatives to form any type of organization for negotiating their working conditions	8.4: employees and contractors of organic perations have the freedom to associate, the right to organize and the right to bargain collectively

	EUREPGAP	Sustainable Agricultural Standards	IFOAM
change of local communities way of life, economy and culture		7.1: respect areas and activities that are important to the community socially, culturally, biologically, environmentally and religiously 7.2: policies and procedures for consulting and considering the interests of local populations and community interest groups regarding new works, production areas, or operational changes that could have a negative impact on their quality of life 7.3: policies and procedures for prioritizing the hiring and training of a local labor force and for contracting and acquiring local services and products 7.4: protection and conservation of community natural resources, collaborate with the development of the local economy, and contribute fairly towards the costs of the community infrastructure 7.5: help with environmental education efforts in the local school system and must support and collaborate with local research in areas related to this standard 5.17: mechanisms to guarantee access to education for the school-age children that live on the farm 5.18: educational program directed towards administrative and operative personnel (farm workers) and their families	
discrimination		5.2: farm must not discriminate in its labor and hiring policies and procedures along the lines of race, color, gender, age, religion, social class, political tendencies, nationality, syndicate membership, sexual orientation, marital status or any other motive as indicated by applicable laws, ILO Conventions 100 and 111, and this standard; farm must offer equal pay, training and promotion opportunities and benefits to all workers for the same type of work; farm must not influence the political, religious, social or cultural convictions of workers	8.5 operators shall provide their employees and contractors equal opportunity and treatment, and shall not act in a discriminatory way
land rights			

A-4 Biomass Criteria for Certification of Green Electricity

The following overview for sustainability criteria for biomass used in certification schemes for green electricity is based on Oehme (2006).

	Eugene	**Austrian Ecolabel UZ 46**	**Bra Miljöval**	**Ecoenergia**
Country	Europe	Austria	Sweden	Finnland
responsible body	Non-profit membership-based organisation of green energy labelling bodies in Europe	Federal Ministry of Agriculture and Forestry, Environment and Water Management	The Swedish Society for Nature Conservation	Suomen luonnonsuojeluliitto (Finnish Association for Nature Conservation)
energy crops	dedicated energy crops, where crops are grown for energy	primary biomass: plants or parts of plants directly used for electricity generation without chemical conversion (wooden, cellulosic or oil-containing biomass)	energy forest	
forestry	forestry and arboricultural material (wood from existing plantations, natural and semi-natural woodland and urban forestry)	forestry biomass, free of halogenated organic compounds: wood from forests, open fields and energy wood fields firewood, chips, residues from scantling production, wood or bark pellets, gas produced from wood, charcoal, chopped straw	wood fuel	chipped wood, wood residue from the mechanical forest industry, bark and sawdust from the forest processed fuels originationg from wood (pellets and briquettes)
agriculture and agricultural residues	residual straw from agriculture	agricultural biomass: agricultural plants, crop residues, untreated or processed by-products (e.g. straw, oil seeds, etc.)	straw fuel and other fuels from agricultural land	biomass grown on fields ('energy willows', straw, reed canary-grass)
wood residues, waste wood	urban waste wood collected separately (unpainted, untreated, or unpressurised wood, not containing plastics, or metals); residues of the wood industry (e.g. sawdust)	saw residues		clean wastewood

	Eugene	**Austrian Ecolabel UZ 46**	**Bra Miljöval**	**Ecoenergia**
(industrial) biomass residues	biomass residues from landscape and park management; vegetable processing biomass residues from food industry	secondary biomass: residues of utilization of organic matter; especially for human or animal nutrition; utilization in households or industry, where organic matter has undergone a chemical alteration (e.g. manure and liquide manure, garbage of canteens or kitchens)	the pulp industry's so-called 'lutar' are also approved	biofuels from the pulp and paper industry (black liquor and tree bark), natural vegetation harvested from shores and waterway areas / reed canary grass, common reed)
GMO			no biofuel from GMO	
biomass fuel	Dedicated energy crops used in new generating stations shall come from FSC (Forest Stewardship Council) certified sources. A generation station is “new” if it has entered operation after January 1, 2001. For existing generating stations using wood (from dedicated energy crops and forestry and arboricultural material), the plant will have to draw an action plan to ensure that the wood used will be purchased from FSC certified sources within a time of 4 years.	After burning biofuel, the nutrients in the ash must be returned to the type of ground from which it has originated. (Details of the criteria see report.)	Wood fuel should come from FSC-certified forestry operations or from forestry operations that do not fell in the following areas: key biotopes, according to the Regional Forestry Board or the equivalent according to the particular country’s definition and methodology cf. FSC 6.1.1b) · natural forests (FSC 6.1.1a); · waste land; · uncultivated meadow and pasture land (FSC 6.2.1a); · naturally leaf-dominated damp or wetlands (FSC 6.1.2b); · the mountainous zone above the nature conservation boundary as defined by the Swedish Society for Nature Conservation	The Finnish Association for Nature Conservation requires a chain of custody (verification of origin) and the type of raw material used (chips from a regeneration cut, chips from small-sized stemwood from silvicultural cuttings, etc.) to be known.
agriculture / soil	For biofuel such as straw, and their equivalent, which are cultivated on agriculture land, cultivation should be carried out with the goal to reduce water and pesticides use, and taking into consideration national best practices.			For 'energy forests', straw fuels, and their equivalent, which are cultivated on agricultural land good water protection practices must be adopted during cultivation.

	Gruener Strom Label	Ok-Power	Naturemade Basic	Naturemade Star (additional criteria)
Country	Germany	Germany	Switzerland	
responsible body	Gruener Strom Label e.V. (EUROSOLAR e.V., BUND, VERBRAUCHER INITIATIVE e.V., IPPNW, BdE e.V., NABU e.V., DNR et al.	EnergieVision e.V. (Öko-Institut, Verbraucher-Zentrale Nordrhein-Westfalen, WWF Germany)	VUE (association established to promote environment- friendly electricity) Its advisory board consists of representatives from NGO, renewable energy associations, association for water economy, electricity producers, distributors, suppliers, bulk power users.	
energy crops	Biomass in accordance with biomass regulation (Federal Law Gazette I 2001, 1234)	All plants according to the EEG		
wood residues, waste wood	biomass regulation excludes waste wood, if PCB or PCT > 0.005% (mass), mercury > 0.0001% (mass)			
GMO			No use of genetically modified plants for electricity production	
biomass fuel general or wood fuel	Biomass fuel need to be comply with criteria of organic farming (AGÖL or EEC Regulation 2092/91). These criteria do not apply for cultivated biomass for cofermentation in rural biogas plants (< 500 kWe) and thereby contributes to energy output by 50% at the maximum.	Biomass from dedicated cultivation (rapeseed oil, whole plant, short rotation wood) shall come from certified organic farming or FSC (Forest Stewardship Council) certified forestry.		Tropic timber shall come from FSC (Forest Stewardship Council) certified forestry. Untreated wood comply with a standard which is oriented towards the FSC (criteria for plants using wood fuel or waste wood).
agriculture / soil		Biomass from dedicated cultivation (rapeseed oil, whole plant, short rotation wood) shall come from certified organic farming.	The long-term fertility and productivity of the soil used to produce the fuel has to be ensured.	Biomass from dedicated cultivation need to comply with guidelines for integrated crop protection (criteria for fermentation of green biomass).

	Milieukeur	**Green Power**	**Green-e**	**Environmental Choice**
Country	Netherlands	Australia	USA (New England, NY, Mid Atlantic, OH, TX, IL, MI)	Canada
responsible body	Stichting Milieukeur	Australian Government, Dep. of Energy, Utilities & Sustainability	Non-Profit Center for Resource Solutions, CA. In each, Green-e works with Regional Advisory Committees	Environment Canada's ecolabelling program
energy crops	Biomass within the meaning of the Electricity Code 1998, 36a par.1 sub j. This law defines Biomass as "the biologically degradable fraction of products, waste matters and residues from agriculture, including plant and animal matter, forestry and related branches of industry, as well as industrial and household waste which is wholly biologically degradable.	The acceptability of various energy crops will depend upon the agricultural and harvesting practices used, and whether these are considered sustainable. Energy crops sourced from crop activities that clear, or have cleared after 1990, existing old growth or native forests, will not be accepted.	All energy crops	Dedicated energy crops (b)
agriculture and agricultural residues				Agricultural wastes that are solid residues arising from the harvesting and processing of agricultural crops that might otherwise be sent to landfill and/or incinerated
GMO				
biomass fuel	Utilisation of any materials (including wastes) derived from forests other than sustainably harvested plantation forests is excluded. Plantation-derived wastes should not be sourced from plantations that clear, or have cleared	Sustainably managed plantations, Utilisation of any materials (including wastes) from high conservation value forests, such as old growth forests, other native forests, and ecologically sensitive sites (for example, areas of	If generated from dedicated energy crops: i) use only dedicated energy crops that have been sourced from operations that have implemented a sound environmental management system and are adhering to sound	"Clean biomass" means organic materials that have, at no stage in their lifecycle, been treated with organic and/or inorganic substances to change, protect or supplement the physical properties of the materials (including inter alia synthetic chemical pest-control products, fungicides, wood preservatives, paints, varnishes or other surfaces coatings,

	Milieukeur	Green Power	Green-e	Environmental Choice
	after 1990, existing old growth or native forests.	remnant native vegetation) are not acceptable under Green Power.	environmental management practices, and ii) ensure the rate of harvest does not exceed levels that can be sustained.	halogenated compounds and/or compounds containing heavy metals).
agriculture / soil	Animal or animal-related biomass is permitted for the label only if the biomass applied has been gathered from processes in which the main product fulfils the criteria of Organic Farming (EKO) or Milieukeur criteria for farming.			i) Use only wood-wastes and/or agricultural wastes that have been sourced from operations that have implemented a sound environmental management system and are adhering to sound environmental management practices, ii) ensure the rate of harvest does not exceed levels that can be sustained, and iii) not use wastes from species that are listed in the CITES Appendices.

A-5 List of URL for relevant sources of criteria and standards

General Systems for Biomass Products

American Tree Farm System: www.treefarmsystem.org

Basel Criteria for Responsible Soy Production: http://assets.panda.org/downloads/05_02_16_basel_criteria_engl.pdf

Clean Clothes Campaign: http://www.cleanclothes.org/codes/ccccode.htm

EUREPGAP Protocol for Fresh Fruit and Vegetables: http://www.agribusinessonline.com/regulations/eurepprotocol.pdf

Fairtrade Labelling Organisations International FLO: http://www.fairtrade.net

Flower Label Programm (FLP): http://www.fairflowers.de

Forest Stewardship Council (FSC): http://www.fsc.org

Green Gold Label: www.controlunion.com/certification/program/Program.aspx?Program_ID=19

Pan-European Forest Council (PEFC): www.pefc.org

RSPO Principles and Criteria for Sustainable Palm Oil Production: www.rspo.org

Sustainable Agricultural Standards: www.rainforest-alliance.org/programs/agriculture/certified-crops/standards.html

Sustainable Forestry Initiative Standard (SFIS): www.aboutsfb.org

Utz Kapeh - Codes of Conduct: www.utzkapeh.org

Green Electricity

Austrian Ecolabel – Austria: www.umweltzeichen.at

Bra Miljöval – Sweden: www.snf.se/bmv/english.cfm

Ecoenergia – Finland: www.ekoenergia.info/english/

Environmental Choice – Canada: www.environmentalchoice.ca

Eugene Standard: www.eugenestandard.org

Green-e – USA: www.green-e.org

Green Power – Australia: www.greenpower.com.au

Gruener Strom Label – Germany: www.gruenerstromlabel.de

Milieukeur – Netherlands: www.milieukeur.nl

naturemade – Switzerland: www.naturemade.ch

ok-power – Germany: www.ok-power.de