Supply Base Report:

Edenderry Power Ltd
Third Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 2.2 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

For further information on the SBP Framework and to view the full set of documentation see **www.sbp-cert.org**

Document history

Version 1.0	**Published 26 March 2015**
Version 2.0	Published 10 August 2023
Version 2.1	Published 15 April 2024
Version 2.2	Published 21 May 2025
Version 2.3	Published 14 August 2025

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1 Overview

Producer name:	Edenderry Power Ltd
Producer address:	Ballykilleen, Edenderry Co Offaly Edenderry, Ireland
SBP Certificate Code:	SBP-10-20
Geographic position:	53.290071, -7.085919
Primary contact:	Joseph Spollen, +353 879 654 645, joseph.spollen@bnm.ie
Company website:	https://www.bordnamona.ie
Date report finalised:	29 Aug 2026
SBR reporting period from:	01 Jul 2025
SBR reporting period to:	30 Jun 2026
Name of the Certification Body:	Preferred by Nature OÜ
Certification Body Approval date:	12 Nov 2026
SBP Standard(s) used:	SBP Standard 1: Feedstock Compliance v2.0, SBP Standard 2: Feedstock Verification v2.0, SBP Standard 4: Chain of Custody v2.0, SBP Standard 5: Collection and Communication of Data v2.0, Instruction Document 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413
Feedstock origin (countries)	Ireland (0.73), United Kingdom (0.12)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

Edenderry Power Limited (EPL) operates the 128MWe Edenderry Power Plant at Ballykilleen, Edenderry, Co. Offaly, Ireland. The plant commenced operation in the year 2000 and was originally a 100% peat fired power plant, since 2008 however the plant has co-fired peat with biomass, with the volumes of biomass being consumed at the plant increasing year on year since then.
January 2024 saw the plant become 100% Biomass fired. The biomass material used at the plant is made up of primarily indigenously sourced residual materials from the Indigenous Sawmilling, Forestry , Tree Surgery and Agri residue sectors. EPL is part of the wider BnM group which is involved in the area's of Renewable Energy Development, Peatland Rehabilitation and Recycling

Products included in the scope of SBP Certification: *WB 2.1 Wood chips, WB 2.2 Sawdust*

Number of employees: *95*

Annual maximum production capacity (metric tonnes): *530000*

Number of direct feedstock suppliers: *140*

Approximate number of feedstock sub-suppliers: *40*

Description of the chain-of-custody and upstream supply chain:

In the case of Edenderry Power, January 2024 saw the plant move to being 100% Biomass fired. The biomass material used at the plant is made up of primarily indigenously sourced residual materials from the Sawmilling, Forestry and Tree Surgery sectors, in the form of FSC 100%, FSC CW and controlled material supplies. These are supplemented with imported FSC 100% Woodchips and Wood pellets. The plant provides dispatchable renewable power to the Irish electricity grid.
All Biomass purchased is used for the sole purpose of combustion in the power plant, no material is sold on to third parties and on such basis no claims are made. Verification of usage via consumption figures can be reviewed from the Biomass Inventory Management system (BIMS) when requested.

2.2 Detailed description of the Supply Base

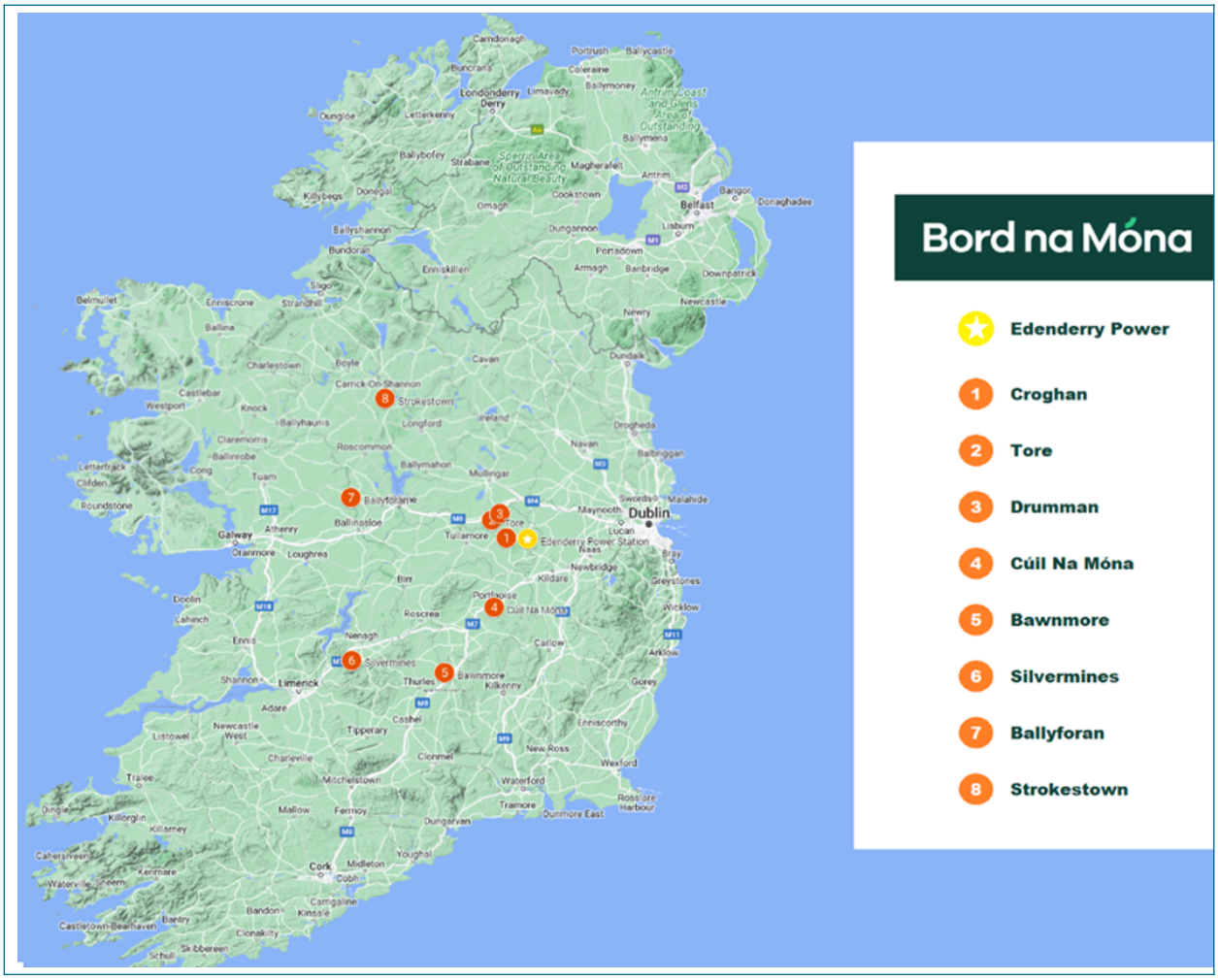
Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

Annex 2 is generated if EU RED SBE is in the scope for each country separately.

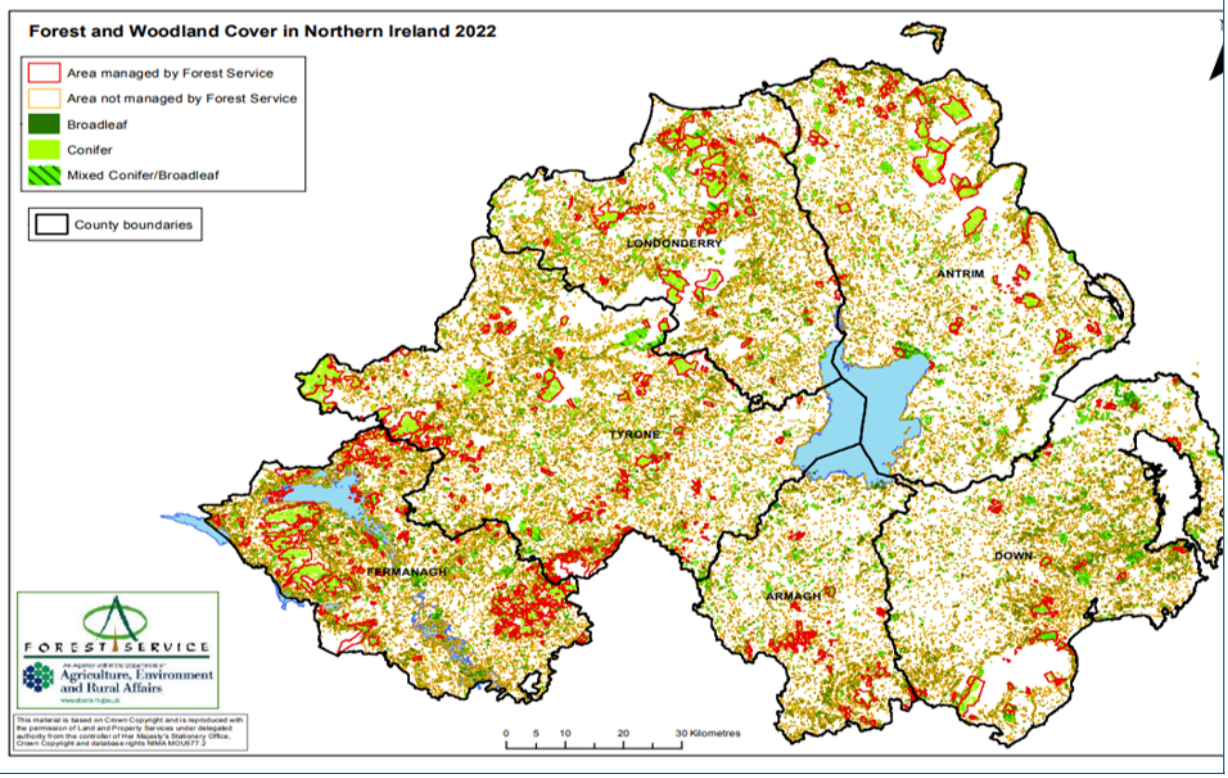
Country	Ireland
Area/Region	0.73
Exclusions	
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Trees outside forest (TOF) - Agricultural land feedstock (3A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock

Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Biomass Producer's own risk assessment used (SBE) , N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme
Provide a concise summary of why a SBE was determined to be required or not required here:	
An SBE was deemed to be required as whilst a large volume of the material supplied comes from certified suppliers there are volumes supplied from non certified suppliers this is primarily in the form of TOF which have to be reviewed which involves on site review of sources and completion of checklist	
Feedstock types included in SBE:	Primary feedstock, Processing residues
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	0.7300
Map(s) of the Supply Base area:	



Country	United Kingdom
Area/Region	0.12
Exclusions	
Feedstock types	Primary feedstock, Processing residues
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Trees outside forest (TOF) - Agricultural land feedstock (3A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Biomass Producer's own risk assessment used (SBE) , N/A – Primary and/or Processing residues certified to an SBP- recognised controlled scheme

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Feedstock types included in SBE:	Primary feedstock, Processing residues
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	0.1200
Map(s) of the Supply Base area:	



2.3 Feedstock information

a. **Total volume of Feedstock:** 400,000-600,000 tonnes

b. **Volume of primary feedstock:** 200,000-400,000 tonnes

c. **List of all the species in primary feedstock, including scientific name:**

Picea sitchensis	Sitka Spruce
Picea abies	Norway Spruce
Pinus sylvestris	Scots Pine
Fraxinus excelsior	Ash
Betula pendula	Birch
Cupressus gigantea	Leylandi
Salix spp	Willow
Pseudotsuga menziesii	Douglas Fir
Larix kaempferi	Japanese Larch
Fagus sylvatica	Beech
Acer pseudoplatanus	Sycamore
Thuja plicata	Red Cedar
Larix decidua	European Larch
Crataegus monogyna	Whitethorn
Prunus spinosa	Blackthorn
Pinus contorta	Lodge Pole Pine

d. **Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** Yes - Minority

Explanation: Volume of Material received from Plantations affected with Ash Die Back which is a serious disease of ash trees caused by the invasive fungal pathogen Hymenoscyphus fraxineus (previously known as Chalara fraxinea), Ash dieback was first detected in the Republic of Ireland in October 2012 on plants imported from continental Europe. The disease is now prevalent throughout most of the island of Ireland and is likely to cause the death of the majority of the ash trees over the next two decade. In addition significant volumes received from Storm Damaged Plantations following Storm Eowyn

e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%)**: 10.00

f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 90.00

g. **Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00

h. **Indicate how you determine the proportion of saw log:** Specification used by the sawmill closest to where the wood was grown.

i. **Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 0.00

j. **Select forest type(s) where the primary feedstock was sourced from:** Planted Forest

k. **Select the main harvesting system(s) used for the sourced primary feedstock:** Mix of the above

l. **Volume of primary feedstock from primary forest:** 0

m. **Volume of processing residues feedstock:** 1-200,000 tonnes
Physical form of the feedstock: Chips, Sawdust, Clean chips or dust

n. **Share of SBP-recognised system claim for processing residues:**

20.00 % FSC controlled

o. **Volume of post-consumer feedstock:** 0
Physical form of the feedstock: Chips, Sawdust, Clean chips or dust

p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 600000 tonnes

q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 1500000.00 tonnes

Explanation: There was 4.25 million m3 of material harvested in the Supply Base in 2023 with this output to increase in the coming years, At the beginning of 2025 following Storm Eowyn significant windblow has occurred with supply projections for Biomass Feedstock increase above estimate bases circa 25% of that material will be available as Residue, The evaluation assessed each of the indicators within SBP Framework Instruction Document REDII : Feedstock Compliance to determine the level of risk associated with each indicator. This assessment reviewed applicable laws and regulations and forestry best management practices, analysed high conservation areas within the supply base for their rareness and level of protection and assessed the economic impact of the company's presence in the supply base. Forestland ownership in the supply area is is a mix of public and private. The forest industry is well established with training and forestry best management practices required by all large wood consuming mills. This review and analysis was completed using stated laws and regulations, published forestry best management practices, Department of Agriculture guidance, research from Teagasc and other noted experts and web resources.

3 Supply Base Risk Assessments and Risk Management Measures

Guidance: Biomass Producers shall demonstrate that any specified risks of sourcing feedstock not in compliance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements. Following section applies to Biomass Producer's implementing SBP Supply Base Evaluation (SBP RRA or company own risk assessment). EU RED Supply Base Evaluation details are reported in Annex 2.

☐ **Not Applicable – Supply Base Evaluation not implemented**

3.1 Summary of the Supply Base Evaluation

Edenderry Power employs a documented process for converting the FSC Controlled Wood Due Diligence System (DDS) into a system capable of demonstrating that eligible feedstock meets the requirements for an SBP-controlled claim.

The supply base is located primarily in the Republic of Ireland which covers 731,650 ha of 99% Plantation Forest and 1% semi natural Forest, Species extracted from the supply base are conifer species (Spruce 56%, Pine 11%, also including some native species such as Yew and Scots Pine). 17.5% of the forests are classified as broadleaf and 13.9% to be categorised as mixed forest. 97.9% of the total conifer forest area is classified as non-native while 80.2% of the total broadleaf area classified as native (Oak, Ash, Birch, Hazel, Alder etc.) The Supply in addition covers Trees' Outside the Forest including sources from Short Rotation Coppiced Willow Plantations

Ireland currently sites at 11% Forestry cover with efforts to increase these figures ongoing.

Legal and Regulatory Framework relevant to Irish Forestry

Forestry in Ireland operates within a legal and regulatory framework – from 24th May 2017 the Forest Act 2014 and the Forestry Regulations 2017 (SI No 191 of 2017) will come into force. This is necessary in order to protect forests and also to ensure that forestry operations and activities are carried out in compliance with the principles of sustainable forest management. It is important that those involved in forestry sector are familiar with the various legal and regulatory obligations governing forestry.
• Tree felling – a Felling License is required to uproot or to cut down any tree (subject to certain exemptions);
• Aerial fertilisation – an Aerial Fertilisation Licence must be obtained before a person can use an aircraft to apply fertiliser to a forest;
• Afforestation – an Afforestation Licence is required for all afforestation projects where the area involved is greater than 0.10 hectares (approximately 0.25 acres);
• Forest road construction – a licence is required to construct a forest road. (If a forest road construction project includes the provision of access to a public road, planning permission for the access may also be required.)

The following lists relevant Irish and EU legislation, together with the various international protocols which have a bearing on forest practice in Ireland.
Primary legislation is outlined below
• Forestry Act, 2014
• Environmental Protection Agency Act 1992
• Forestry Act 1946 (Revoked and replaced by Forestry Act, 2014)
• Forestry Act 1988
• Litter Pollution Acts 1997 to 2009
• Local Government (Water Pollution) Acts 1977-1990
• National Monuments Acts 1930-2004

• Occupiers Liability Act 1995
• Planning and Development Acts 2000 to 2011
• Roads Act 1993 to 2007
• Waste Management Acts 1996 to 2011
• Wildlife Acts 1976 and 2000

Tree's outside the Forest

The following are common scenarios where trees can be felled without the need to submit a felling licence application:

A tree in an urban area. (An urban area is an area that is comprised of a city, town or borough specified in Part 2 of Schedule 5 and in Schedule 6 of the Local Government Act 2001, before the enactment of the Local Government Reform Act 2014. This act dissolved Town Councils, however, the old boundaries of these areas are still considered urban for the purpose of the Forestry Act 2014.

A tree within 30 metres of a building (other than a wall or temporary structure) but excluding any building built after the trees were planted.

A tree less than 5 years of age that grew through natural regeneration and was removed from a field as part of the normal maintenance of agricultural land (but not where the tree is standing in a hedgerow).

A tree uprooted in a nursery for the purpose of transplantation.

A tree of the willow or poplar species planted and maintained solely for fuel under a short rotation coppice.

A tree outside a forest within 10 metres of a public road and which, in the opinion of the owner (being an opinion formed on reasonable grounds), is dangerous to persons using the public road on account of its age or condition.

A tree outside a forest, the removal of which is specified in a grant of planning permission, providing it was indicated on the lodged plans as being planned for removal as part of the application.

A tree outside a forest of the hawthorn or blackthorn species growing in a hedge.

A tree outside a forest in a hedgerow and felled for the purposes of its trimming the hedge providing that the tree does not exceed 20 centimetres diameter at 1.3 metres above ground level.

Agricultural holdings can fell a limited small number of trees however the Forestry Act 2014, s.19(1)(m)(iii), which limits the exemption to a tree whose volume does not exceed 3 cubic metres, up to a total not exceeding 15 cubic metres per holding in any 12-month period, and only where the tree is removed by the owner for use on that holding not exceeding 3 cubic metres.

Outside a forest, apple, pear, plum, or damson species are exempt from the need for a felling license.

Management of CITES or IUCN Species

The National Parks and Wildlife service (NPWS) provides checklists of the plant and animal species that are afforded legal protection in Ireland. Felling Operations are to be managed within the constrains of these requirements e.g. there are special requirements for sites where species such as Hen Harrier are present, evidence of adherence to such requirements has been provided at supplier audits.

Primary and Secondary Suppliers

Of the Indigenous supply base of 126 suppliers 22 suppliers are classed as Secondary Suppliers with 104 primary suppliers.

3.2 Conflicts with applicable national and sub-national legislation

The use of Biomass Feedstock to generate Electricity at Edenderry Power Plant is aligned with National and EU Legislation on increasing the volume of Renewable Electricity Generation within the mix. Biomass Feedstock sourcing supports sustainable forest management (SFM) with EPL advocating for Brash recovery in particular being a key part of this, In addition the ability of the plant to utilise materials from diseased plantations is supported by the Department of Agriculture as a means of assisting with handling such plantations. The SBE is clearly aligned with local legislation in particular the Timber Felling Licence (TFL) which is a key requirement for processing material from managed plantations

3.3 Risk Management Measures

Guidance: Please provide more details about specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 06 Jul 2026

Biomass Producer's stakeholder engagement end date: 07 Aug 2026

Total number of stakeholders contacted: 20

Give a general description of the process of Stakeholders Engagement, including stakeholders contacted, method of communication and a summary of the comments received:

Documentation compiled and emailed to the below Stakeholders

Forestry Harvesting Contractors
Forestry Consultants
Industry Associations (NGO's)
Woodchipping Contractors
Private Forestry Sector
Public Forestry
Certification Consultants
Sawmills

4.2 Response to stakeholder comments

5 Report updates and approval

This document is: Updated SBR (surveillance audits/scope-change audits)

The document has been updated to reflect the Risk Assessment and protocols associated with the management of material derived from Tree's Outside the Forest, it outlines the legal landscape and the associated actions being undertaken to ensure compliance

Name	Joseph Spollen
Title	Report author
Date of report approval	29 Aug 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Ireland 0.73	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations
Risk Rating	Low Risk

United Kingdom 0.12	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
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Risk Rating	Low Risk

United Kingdom 0.12	Indicator

1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
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Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations
Risk Rating	Low Risk

Ireland 0.73	**Indicator**
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination.

	Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations
Risk Rating	Low Risk

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Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
1.1.4	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	

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Ireland 0.73	**Indicator**
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Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
1.1.5	There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations
Risk Rating	Low Risk

United Kingdom 0.12	Indicator
2.1.1	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations. Whilst it was identified some plantations were in place on peat based soils there was no evidence of these being drained or developed since 2008 with any sites were peat was evident it was clear these had been in grassland or other crops (Wheat/Barley) prior to planting of the SRC Willow
Risk Rating	Low Risk

Ireland 0.73	Indicator
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Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations
Risk Rating	Low Risk

Ireland 0.73	Indicator

2.1.2	Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
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Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**

2.1.3	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
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Risk Rating	Low Risk

Ireland 0.73	**Indicator**
2.1.3	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations
Risk Rating	Low Risk

Ireland 0.73	**Indicator**
2.2.1	Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b.

	Wetlands c. Peatlands d. Highly biodiverse grasslands.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations. Whilst it was identified some plantations were in place on peat based soils there was no evidence of these being drained or developed since 2008 with any sites were peat was evident it was clear these had been in grassland or other crops (Wheat/Barley) prior to planting of the SRC Willow
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
2.2.1	Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations. Whilst it was identified some plantations were in place on peat based soils there was no evidence of these being drained or developed since 2008 with any sites were peat was evident it was clear these had been in grassland or other crops (Wheat/Barley) prior to planting of the SRC Willow
Risk Rating	Low Risk

United Kingdom 0.12	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations. Whilst it was identified some plantations were in place on peat based soils there was no evidence of these being drained or developed since 2008 with any sites were peat was evident it was clear these had been in grassland or other crops (Wheat/Barley) prior to planting of the SRC Willow
Risk Rating	Low Risk

Ireland 0.73	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations including environmental requirements which are directly linked to the Departments supports schemes

	(BISS) Basic Income Support Scheme
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations, as SRC Willow regrows following harvesting using the same root profile, this isn't relevant, where crops are removed completely which we visited the root is mulched just below the ground level and the majority of the shall root system remaining in the soils with studies showing positive soil fertility rates following crop removals
Risk Rating	Low Risk

Ireland 0.73	**Indicator**
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations including environmental requirements which are directly linked to the Departments supports schemes (BISS) Basic Income Support Scheme
Risk Rating	Low Risk

United Kingdom 0.12	Indicator
2.2.4	Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations, as SRC Willow regrows following harvesting using the same root profile, this isn't relevant, where crops are removed completely which we visited the root is mulched just below the ground level and the majority of the shall root system remaining in the soils with studies showing positive soil fertility rates following crop removals
Risk Rating	Low Risk

Ireland 0.73	Indicator
2.2.4	Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations, as SRC Willow regrows following harvesting using the same root profile, this isn't relevant, where crops are removed completely which we visited the root is mulched just below

	the ground level and the majority of the shall root system remaining in the soils with studies showing positive soil fertility rates following crop removals
Risk Rating	Low Risk

Ireland 0.73	**Indicator**
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations, as SRC Willow regrows following harvesting using the same root profile, it has quite a strong water requirement which makes it suitable for heavier soils promoting water management and benefit the soils
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations, as SRC Willow regrows following harvesting using the same root profile, this isn't relevant, where

	crops are removed completely which we visited the root is mulched just below the ground level and the majority of the shall root system remaining in the soils with studies showing positive soil fertility rates following crop removals
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations with no evidence of any negative affects to air emissions.
Risk Rating	Low Risk

Ireland 0.73	**Indicator**
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations with no evidence of any negative affects to air emissions.

Risk Rating	Low Risk

Ireland **0.73**	**Indicator**
2.2.7	Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations around pesticide management, the only evidence of pesticide usage was for basic weed control following harvesting, pesticide usage closely managed by Department of Agriculture with evidence of Bord Bia Audit of spraying equipment and volumes of pesticides purchased
Risk Rating	Low Risk

United Kingdom **0.12**	**Indicator**
2.2.7	Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of

	compliance with applicable laws and regulations around pesticide management, the only evidence of pesticide usage was for basic weed control following harvesting, pesticide usage closely managed by Department of Agriculture with evidence of RED Tractor Audit of spraying equipment and volumes of pesticides purchased
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	No evidence of mismanagement of waste on sites auditted
Risk Rating	Low Risk

Ireland 0.73	**Indicator**
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	No evidence of waste being mismanaged at sites visited during audit process of supply chains
Risk Rating	Low Risk

Ireland 0.73	**Indicator**

2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations around the species used - these followed best practiced guidelines for the most suitable crops to be used in particular lands following soil analysis
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	No evidence of Genetically modified plants used in plantations, significant research occurring in area in Rothamstad UK
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
3.1.1	LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the

	country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	UK is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use
Risk Rating	Low Risk

Ireland 0.73	**Indicator**
3.1.1	LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved

	willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	Ireland is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use
Risk Rating	Low Risk

Ireland **0.73**	**Indicator**
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	To ensure rights of the work force is ensured at all times There are several laws in Ireland that protect employees' rights, including: 1. The Organisation of Working Time Act 1997, which sets out rules on working hours, rest breaks, annual leave, and public holidays. 2. The National Minimum Wage Act 2000, which establishes the minimum wage rates and provides for the enforcement of minimum wage legislation. 3. The Unfair Dismissals Acts 1977-2015, which provides employees with protection against unfair dismissal and wrongful termination of their employment. 4. The Employment Equality Acts 1998-2015, which prohibit discrimination in employment on the grounds of age, gender, race, religion, disability, and sexual orientation. 5. The Protection of Employees (Part-Time Work) Act 2001, which ensures that part-time workers are not treated less favorably than full-time workers. There was no evidence from our site audits suggesting the applicable laws were being contravened
Risk Rating	Low Risk

United Kingdom 0.12	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	Edenderry Power as part of commercial semi state (BnM) organisation has clear policies in place to ensure the rights of all its staff are managed in a fair and equitable manner, these requirements are also referenced within the Terms & Conditions of supply of biomass materials to Edenderry Owing to a strong legality framework in place and strict terms of sales, audit review and interviews with staff there was no concerns around employee rights the supply base
Risk Rating justification	To ensure rights of the work force is ensured at all times
Risk Rating	Low Risk

United Kingdom 0.12	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	Edenderry Power as part of commercial semi state (BnM) organisation has clear policies in place to ensure the rights of all its staff are managed in a fair and equitable manner, these requirements are also referenced within the Terms & Conditions of supply of biomass materials to Edenderry Owing to a strong legality framework in place and strict terms of sales, audit review and interviews with staff there was no concerns around employee rights the supply base
Risk Rating justification	To ensure rights of the work force is ensured at all times
Risk Rating	Low Risk

Ireland 0.73	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	

	To ensure rights of the work force is ensured at all times There are several laws in Ireland that protect employees' rights, including: 1. The Organisation of Working Time Act 1997, which sets out rules on working hours, rest breaks, annual leave, and public holidays. 2. The National Minimum Wage Act 2000, which establishes the minimum wage rates and provides for the enforcement of minimum wage legislation. 3. The Unfair Dismissals Acts 1977-2015, which provides employees with protection against unfair dismissal and wrongful termination of their employment. 4. The Employment Equality Acts 1998-2015, which prohibit discrimination in employment on the grounds of age, gender, race, religion, disability, and sexual orientation. 5. The Protection of Employees (Part-Time Work) Act 2001, which ensures that part-time workers are not treated less favorably than full-time workers. There was no evidence from our site audits suggesting the applicable laws were being contravened
Risk Rating	Low Risk

Ireland **0.73**	**Indicator**
4.1.3	Child labour shall not be used.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	To ensure rights of the work force is ensured at all times There are several laws in Ireland that protect employees' rights, including: 1. The Organisation of Working Time Act 1997, which sets out rules on working hours, rest breaks, annual leave, and public holidays. 2. The National Minimum Wage Act 2000, which establishes the minimum wage rates and provides for the enforcement of minimum wage legislation. 3. The Unfair Dismissals Acts 1977-2015, which provides employees with protection against unfair dismissal and wrongful termination of

	their employment. 4. The Employment Equality Acts 1998-2015, which prohibit discrimination in employment on the grounds of age, gender, race, religion, disability, and sexual orientation. 5. The Protection of Employees (Part-Time Work) Act 2001, which ensures that part-time workers are not treated less favourably than full-time workers. 6. Labour Relations Commission and Workplace Relations Commissions There was no evidence from our site audits suggesting the applicable laws were being contravened
Risk Rating	Low Risk

United Kingdom **0.12**	**Indicator**
4.1.3	Child labour shall not be used.
Supply Base Verifiers	Edenderry Power as part of commercial semi state (BnM) organisation has clear policies in place to ensure the rights of all its staff are managed in a fair and equitable manner, these requirements are also referenced within the Terms & Conditions of supply of biomass materials to Edenderry Owing to a strong legality framework in place and strict terms of sales, audit review and interviews with staff there was no concerns around employee rights the supply base
Risk Rating justification	To ensure rights of the work force is ensured at all times
Risk Rating	Low Risk

Ireland **0.73**	**Indicator**
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	To ensure rights of the work force is ensured at all times

	There are several laws in Ireland that protect employees' rights, including: 1. The Organisation of Working Time Act 1997, which sets out rules on working hours, rest breaks, annual leave, and public holidays. 2. The National Minimum Wage Act 2000, which establishes the minimum wage rates and provides for the enforcement of minimum wage legislation. 3. The Unfair Dismissals Acts 1977-2015, which provides employees with protection against unfair dismissal and wrongful termination of their employment. 4. The Employment Equality Acts 1998-2015, which prohibit discrimination in employment on the grounds of age, gender, race, religion, disability, and sexual orientation. 5. The Protection of Employees (Part-Time Work) Act 2001, which ensures that part-time workers are not treated less favourably than full-time workers. 6. Labour Relations Commission and Workplace Relations Commissions There was no evidence from our site audits suggesting the applicable laws were being contravened
Risk Rating	Low Risk

United Kingdom **0.12**	**Indicator**
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	Edenderry Power as part of commercial semi state (BnM) organisation has clear policies in place to ensure the rights of all its staff are managed in a fair and equitable manner, these requirements are also referenced within the Terms & Conditions of supply of biomass materials to Edenderry Owing to a strong legality framework in place and strict terms of sales, audit review and interviews with staff there was no concerns around employee rights the supply base
Risk Rating justification	To ensure rights of the work force is ensured at all times
Risk Rating	Low Risk

Ireland **0.73**	**Indicator**
4.1.5	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded

Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	To ensure rights of the work force is ensured at all times There are several laws in Ireland that protect employees' rights, including: 1. The Organisation of Working Time Act 1997, which sets out rules on working hours, rest breaks, annual leave, and public holidays. 2. The National Minimum Wage Act 2000, which establishes the minimum wage rates and provides for the enforcement of minimum wage legislation. 3. The Unfair Dismissals Acts 1977-2015, which provides employees with protection against unfair dismissal and wrongful termination of their employment. 4. The Employment Equality Acts 1998-2015, which prohibit discrimination in employment on the grounds of age, gender, race, religion, disability, and sexual orientation. 5. The Protection of Employees (Part-Time Work) Act 2001, which ensures that part-time workers are not treated less favourably than full-time workers. 6. Labour Relations Commission and Workplace Relations Commissions There was no evidence from our site audits suggesting the applicable laws were being contravened
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
4.1.5	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded
Supply Base Verifiers	Edenderry Power as part of commercial semi state (BnM) organisation has clear policies in place to ensure the rights of all its staff are managed in a fair and equitable manner, these requirements are also referenced within the Terms & Conditions of supply of biomass materials to Edenderry Owing to a strong legality framework in place and strict terms of sales, audit review and interviews with staff there was no concerns around employee

	rights the supply base
Risk Rating justification	To ensure rights of the work force is ensured at all times
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Risk Rating justification	To ensure rights of the work force is ensured at all times
Risk Rating	Low Risk

Ireland 0.73	**Indicator**
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	To ensure rights of the work force is ensured at all times There are several laws in Ireland that protect employees' rights, including: 1. The Organisation of Working Time Act 1997, which sets out rules on working hours, rest breaks, annual leave, and public holidays. 2. The National Minimum Wage Act 2000, which establishes the minimum wage rates and provides for the enforcement of minimum wage legislation. 3. The Unfair Dismissals Acts 1977-2015, which provides employees with protection against unfair dismissal and wrongful termination of their employment. 4. The Employment Equality Acts 1998-2015, which prohibit

	discrimination in employment on the grounds of age, gender, race, religion, disability, and sexual orientation. 5. The Protection of Employees (Part-Time Work) Act 2001, which ensures that part-time workers are not treated less favourably than full-time workers. 6. Labour Relations Commission and Workplace Relations Commissions There was no evidence from our site audits suggesting the applicable laws were being contravened
Risk Rating	Low Risk

Ireland 0.73	**Indicator**
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	To ensure rights of the work force is ensured at all times There are several laws in Ireland that protect employees' rights, including: 1. The Organisation of Working Time Act 1997, which sets out rules on working hours, rest breaks, annual leave, and public holidays. 2. The National Minimum Wage Act 2000, which establishes the minimum wage rates and provides for the enforcement of minimum wage legislation. 3. The Unfair Dismissals Acts 1977-2015, which provides employees with protection against unfair dismissal and wrongful termination of their employment. 4. The Employment Equality Acts 1998-2015, which prohibit discrimination in employment on the grounds of age, gender, race, religion, disability, and sexual orientation. 5. The Protection of Employees (Part-Time Work) Act 2001, which ensures that part-time workers are not treated less favourably than full-time workers. 6. Labour Relations Commission and Workplace Relations Commissions

	There was no evidence from our site audits suggesting the applicable laws were being contravened
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation
Supply Base Verifiers	Edenderry Power as part of commercial semi state (BnM) organisation has clear policies in place to ensure the rights of all its staff are managed in a fair and equitable manner, these requirements are also referenced within the Terms & Conditions of supply of biomass materials to Edenderry Owing to a strong legality framework in place and strict terms of sales, audit review and interviews with staff there was no concerns around employee rights the supply base
Risk Rating justification	To ensure rights of the work force is ensured at all times
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
4.1.8	Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.
Supply Base Verifiers	Edenderry Power as part of commercial semi state (BnM) organisation has clear policies in place to ensure the rights of all its staff are managed in a fair and equitable manner, these requirements are also referenced within the Terms & Conditions of supply of biomass materials to Edenderry Owing to a strong legality framework in place and strict terms of sales, audit review and interviews with staff there was no concerns around employee rights the supply base
Risk Rating justification	To ensure rights of the work force is ensured at all times
Risk Rating	Low Risk

Ireland 0.73	**Indicator**

4.1.8	Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	To ensure rights of the work force is ensured at all times There are several laws in Ireland that protect employees' rights, including: 1. The Organisation of Working Time Act 1997, which sets out rules on working hours, rest breaks, annual leave, and public holidays. 2. The National Minimum Wage Act 2000, which establishes the minimum wage rates and provides for the enforcement of minimum wage legislation. 3. The Unfair Dismissals Acts 1977-2015, which provides employees with protection against unfair dismissal and wrongful termination of their employment. 4. The Employment Equality Acts 1998-2015, which prohibit discrimination in employment on the grounds of age, gender, race, religion, disability, and sexual orientation. 5. The Protection of Employees (Part-Time Work) Act 2001, which ensures that part-time workers are not treated less favourably than full-time workers. 6. Labour Relations Commission and Workplace Relations Commissions There was no evidence from our site audits suggesting the applicable laws were being contravened
Risk Rating	Low Risk

Ireland **0.73**	**Indicator**
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot

Risk Rating justification	To ensure rights of the work force is ensured at all times There are several laws in Ireland that protect employees' rights, including: 1. The Organisation of Working Time Act 1997, which sets out rules on working hours, rest breaks, annual leave, and public holidays. 2. The National Minimum Wage Act 2000, which establishes the minimum wage rates and provides for the enforcement of minimum wage legislation. 3. The Unfair Dismissals Acts 1977-2015, which provides employees with protection against unfair dismissal and wrongful termination of their employment. 4. The Employment Equality Acts 1998-2015, which prohibit discrimination in employment on the grounds of age, gender, race, religion, disability, and sexual orientation. 5. The Protection of Employees (Part-Time Work) Act 2001, which ensures that part-time workers are not treated less favourably than full-time workers. 6. Labour Relations Commission and Workplace Relations Commissions There was no evidence from our site audits suggesting the applicable laws were being contravened
Risk Rating	Low Risk

United Kingdom **0.12**	**Indicator**
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	Edenderry Power as part of commercial semi state (BnM) organisation has clear policies in place to ensure the rights of all its staff are managed in a fair and equitable manner, these requirements are also referenced within the Terms & Conditions of supply of biomass materials to Edenderry Owing to a strong legality framework in place and strict terms of sales, audit review and interviews with staff there was no concerns around employee rights the supply base
Risk Rating justification	To ensure rights of the work force is ensured at all times
Risk Rating	Low Risk

Ireland **0.73**	**Indicator**

4.1.10	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	The health and Safety at Work Act 2005 is the key piece of legislation in this area, key elements from a supply chain point of view is the harvesting of the crops, are the operators trained on the use of the equipment and is the equipment fit for purpose, of the audits carried out, the harvesting contractors operated with a high level of Health & Safety with operators suitably trained and machines holding the relevant certificates and maintenance up to date
Risk Rating	Low Risk

United Kingdom **0.12**	**Indicator**
4.1.10	Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Supply Base Verifiers	Edenderry Power as part of commercial semi state (BnM) organisation has clear policies in place to ensure the rights of all its staff are managed in a fair and equitable manner, these requirements are also referenced within the Terms & Conditions of supply of biomass materials to Edenderry Owing to a strong legality framework in place and strict terms of sales, audit review and interviews with staff there was no concerns around employee rights the supply base
Risk Rating justification	To ensure rights of the work force is ensured at all times
Risk Rating	Low Risk

Ireland **0.73**	**Indicator**
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot

Risk Rating justification	There was no evidence to suggest that SRC Willow Plantations cultivation or Harvesting had a negative social or community impacts, operations at sites were managed to ensure vehicle movements didn't adversely affect the localities and there was evidence of positive socio economic outcomes
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	Site visits and audits illustrated that the operators and suppliers of Willow chips used local operators and were active members of the communities they lived in and ultimately where the products originated from
Risk Rating justification	Avoidance of negative social impacts To ensure that operators are aware of the requirements of the communities they operate in and support local providers thereby giving back to the communities they are working in .
Risk Rating	Low Risk

Ireland 0.73	**Indicator**
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	There was no evidence to suggest that SRC Willow Plantations cultivation or Harvesting had a negative social or community impacts, operations at sites were managed to ensure vehicle movements didn't adversely affect the localities and there was evidence of positive socio economic outcomes through employment of equipment operators and support services.
Risk Rating	Low Risk

United Kingdom 0.12	**Indicator**
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	

	Site visits and audits illustrated that the operators and suppliers of Willow chips used local operators and were active members of the communities they lived in and ultimately where the products originated from
Risk Rating justification	Avoidance of negative social impacts To ensure that operators are aware of the requirements of the communities they operate in and support local providers thereby giving back to the communities they are working in .
Risk Rating	Low Risk

Ireland **0.73**	**Indicator**
4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	Strong Legislatory framework in place to ensure that Agricultural Energy Crops do not harm or affect area's with High Conservation Value's such as peatlands or waterways, farmers/growers as part of the Basic Income Support Scheme payments are obligated to ensure habitats are maintained with these monitored by DAFM
Risk Rating	Low Risk

United Kingdom **0.12**	**Indicator**
4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced
Supply Base Verifiers	Site visits and audits illustrated that the operators and suppliers of Willow chips used local operators and were active members of the communities they lived in and ultimately where the products originated from
Risk Rating justification	Avoidance of negative social impacts To ensure that operators are aware of the requirements of the communities they operate in and support local providers thereby giving back to the communities they are working in .
Risk Rating	Low Risk

Ireland 0.73	Indicator
4.2.4	Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	Strong Legislatory framework in place to ensure that Agricultural Energy Crops do not harm or affect area's with High Conservation Value's such as peatlands or waterways, the rights of local communities are respected and these are aligned with the local farmers/growers as part of the Basic Income Support Scheme payments are obligated to ensure habitats are maintained with these monitored by DAFM
Risk Rating	Low Risk

United Kingdom 0.12	Indicator
4.2.4	Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.
Supply Base Verifiers	Site visits and audits illustrated that the operators and suppliers of Willow chips used local operators and were active members of the communities they lived in and ultimately where the products originated from
Risk Rating justification	Avoidance of negative social impacts To ensure that operators are aware of the requirements of the communities they operate in and support local providers thereby giving back to the communities they are working in .
Risk Rating	Low Risk

United Kingdom 0.12	Indicator
4.2.5	Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.
Supply Base Verifiers	Site visits and audits illustrated that the operators and suppliers of Willow chips used local operators and were active members of the communities they lived in and ultimately where the products originated from
Risk Rating justification	

	Avoidance of negative social impacts To ensure that operators are aware of the requirements of the communities they operate in and support local providers thereby giving back to the communities they are working in .
Risk Rating	Low Risk

Ireland **0.73**	**Indicator**
4.2.5	Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	The legal framework that is in place relates to the *Land And Conveyancing Law Reform Act 2013*. It is prepared by the Law Reform Commission in accordance with its function under the *Law Reform Commission Act 1975* (3/1975) to keep the law under review and to undertake revision and consolidation of statute law.
Risk Rating	Low Risk

Ireland **0.73**	**Indicator**
4.2.6	Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	There is legislation in place within the jurisdiction to manage the rights of Indigenous peoples, within the supply base there was no evidence of indigenous peoples owning or occupying lands related to same with all lands in private ownerships
Risk Rating	Low Risk

United Kingdom **0.12**	**Indicator**

4.2.6	Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Supply Base Verifiers	Site visits and audits illustrated that the operators and suppliers of Willow chips used local operators and were active members of the communities they lived in and ultimately where the products originated from
Risk Rating justification	Avoidance of negative social impacts To ensure that operators are aware of the requirements of the communities they operate in and support local providers thereby giving back to the communities they are working in .
Risk Rating	Low Risk

Ireland **0.73**	**Indicator**
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot
Risk Rating justification	The **Historic and Archaeological Heritage and Miscellaneous Provisions A ct 2023** is a piece of legislation that modernizes the protection of Ireland's his toric and archaeological heritage. It repeals and replaces the previous Nation al Monuments Acts and introduces several innovative measures, including: A civil enforcement procedure as an alternative to or supplement to criminal p roceedings. No evidence of issues arisen relation to contravention of the above legislation for the SRC Willow Supply Base
Risk Rating	Low Risk

United Kingdom **0.12**	**Indicator**
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Site visits and audits illustrated that the operators and suppliers of Willow chips used local operators and were active members of the communities they lived in and ultimately where the products originated from
Risk Rating justification	Avoidance of negative social impacts To ensure that operators are aware of the requirements of the communities

	they operate in and support local providers thereby giving back to the communities they are working in .
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Ireland
Area	0.73
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	*The supply base is located primarily in the Republic of Ireland which covers 731,650 ha of 99% Plantation Forest and 1% semi natural Forest, Species extracted from the supply base are* conifer species (Spruce 56%, Pine 11%, also including some native species such as Yew and Scots Pine). 17.5% of the forests are classified as broadleaf and 13.9% to be categorised as mixed forest. 97.9% of the total conifer forest area is classified as non-native while 80.2% of the total broadleaf area classified as native (Oak, Ash, Birch, Hazel, Alder etc. Climatic, geographical, and political conditions are more or less the same throughout Ireland and there is no need to divide the country is sub-regions because of the HCV risk assessment. At the start of the 20th century, forest cover in Ireland was very low and estimated at just over 1% (125.200 hectares) in 1908. It fell even lower during the period 1914 -1918. Much of the forests were planted by estate landlords during the late 1700s and early 1800s. A state led programme of planting raised the level of forestry to circa 7% by the 1980s. Since 1981, EU and state grant aided schemes have helped increase the forested area to the present levels. As State planting wound down (not much more abandoned lands available), there was a corresponding increase in private planting, which gathered momentum through the 1980s and 1990s, with a peak reached in 2001 when more than 15,000 hectares were planted; the private afforestation rate has since fallen, amounting to around 6.000-7.000 hectares annually over the past 5 years. Forestry in Ireland operates within a legal and regulatory framework – from 24th May 2017 the Forest Act 2014 and the Forestry Regulations 2017 (SI No 191 of 2017) will come into force. This is necessary in order to protect forests and also to ensure that forestry operations and activities are carried out in compliance with the principles of sustainable forest management. It is important that those involved in forestry sector are familiar with the various legal and regulatory obligations governing

	forestry. While most forestry operations are exempt from the requirement to obtain planning permission, some forestry activities require, under the above legislation, consent by way of licence, from the Department of Agriculture, Food and the Marine. It is an offence to undertake the following forestry activities unless you first obtain a license from the Department: • Tree felling – a Felling License is required to uproot or to cut down any tree (subject to certain exemptions); • Aerial fertilisation – an Aerial Fertilisation Licence must be obtained before a person can use an aircraft to apply fertiliser to a forest; • Afforestation – an Afforestation Licence is required for all afforestation projects where the area involved is greater than 0.10 hectares (approximately 0.25 acres); • Forest road construction – a licence is required to construct a forest road. (If a forest road construction project includes the provision of access to a public road, planning permission for the access may also be required.) Legal and Regulatory Framework relevant to Irish Forestry The following lists relevant Irish and EU legislation, together with the various international protocols which have a bearing on forest practice in Ireland. Primary legislation no legislation on gov.ie – www.irishstatutebook.ie • Forestry Act, 2014 • Environmental Protection Agency Act 1992 • Forestry Act 1946 (Revoked and replaced by Forestry Act, 2014) • Forestry Act 1988 • Litter Pollution Acts 1997 to 2009 • Local Government (Water Pollution) Acts 1977-1990 • National Monuments Acts 1930-2004 • Occupiers Liability Act 1995 • Planning and Development Acts 2000 to 2011 • Roads Act 1993 to 2007 • Waste Management Acts 1996 to 2011 • Wildlife Acts 1976 and 2000 Secondary legislation • SI No 39 of 2020 – Forestry Amdmt No 2 Regs - Single Consent System (pdf 121Kb) • SI 31 of 2020 - Forestry (Amdmt) Regs 2020 re reg 19AA procedures (pdf 99Kb) • Forestry Regulations 2017 (SI No 191 of 2017) (pdf 247Kb) • Forestry Act 1946 (Part IV) Regulations 1949 (S.I. No. 67 of 1949) (Revoked) • European Communities Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272 of 2009) • European Communities (Forest Consent and Assessment) Regulations 2010 (S.I. No 558 of 2010) o (Revoked and replaced by Forestry Regulations, 2017 (S.I. No 191 of

	2017) • European Communities (Aerial Fertilisation) (Forestry) Regulations 2012 (S.I. No 125 of 2012) o (Revoked and replaced by Forestry Regulations, 2017 (S.I. No 191 of 2017) • Safety, Health and Welfare at Work (Construction) Regulations 2006 (S.I. No. 504 of 2006) • Safety, Health and Welfare at Work (General Application) Regulations 2007 (S.I. No. 299 of 2007) • Planning and Development Regulations 2001 (S.I. No. 600 of 2001) EU Legislation no legislation on gov.ie https://eur-lex.europa.eu/homepage.html?locale=en • Council Directive 66/404/EEC on the marketing of forest reproductive material. • Council Directive 71/161/EEC on external quality standards for forest reproductive material marketed within the Community. • Council Directive 77/93/EEC on protective measures against the introduction into the Community of organisms harmful to plants or plant products and against their spread within the Community. • Council Directive 79/409/EEC on the conservation of wild birds. • Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora. • Council Directive 1999/105/EC on the marketing of forest reproductive material. • Directive 2000/60/EC establishing a framework for Community action in the field of water policy. • Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. • Directive 2006/11/EC on pollution caused by certain dangerous substances discharged into the aquatic environment of the Community. • Community Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment. **Tree's outside the Forest** The following are common scenarios where trees can be felled without the need to submit a felling licence application: A tree in an urban area. (An urban area is an area that is comprised of a city, town or borough specified in Part 2 of Schedule 5 and in Schedule 6 of the Local Government Act 2001, before the enactment of the Local Government Reform Act 2014. This act dissolved Town Councils, however, the old boundaries of these areas are still considered urban for the purpose of the Forestry Act 2014. A tree within 30 metres of a building (other than a wall or temporary structure) but excluding any building built after the trees were planted. A tree less than 5 years of age that grew through natural regeneration and was removed from a field as part of the normal maintenance of agricultural land (but not where the tree is standing in a hedgerow). A tree uprooted in a nursery for the purpose of transplantation. A tree of the willow or poplar species planted and maintained solely for

	fuel under a short rotation coppice. A tree outside a forest within 10 metres of a public road and which, in the opinion of the owner (being an opinion formed on reasonable grounds), is dangerous to persons using the public road on account of its age or condition. A tree outside a forest, the removal of which is specified in a grant of planning permission, providing it was indicated on the lodged plans as being planned for removal as part of the application. A tree outside a forest of the hawthorn or blackthorn species growing in a hedge. A tree outside a forest in a hedgerow and felled for the purposes of its trimming the hedge providing that the tree does not exceed 20 centimetres diameter at 1.3 metres above ground level.Agricultural holdings can fell a limited small number of trees not exceeding 3 cubic metres.The maximum number of trees permitted to be felled under that exemption per year is 4 trees (12 cubic metres) Outside a forest, apple, pear, plum, or damson species are exempt from the need for a felling license.
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	**LOW Risk** A felling licence granted by the Minister for Agriculture, Food & the Marine provides authority under the Forestry Act 2014 to fell or otherwise remove a tree or trees and to thin a forest for silvicultural reasons. This Act prescribes the functions of the Minister and details the requirements, these sections describe offences under the Act and the penalties that can be imposed by the Courts. Penalties for illegal tree felling, breach of felling licence conditions or failure to reforest in accordance with a replanting order can be severe. These are set out below. Illegal felling or removal of trees: Date released by the Department of Agriculture Food & Marine (DAFM) in January 2022 note the Forest Service had investigated over 75 cases of alleged felling of Trees in 2021. The majority of these are small scale e.g., removal of Trees from a housing development however in one instance related to felling of over 30 ha of trees discovered by DAFM's Forest Service in Oct 2020. In 2013, there were 100 reports of illegal felling. All the reports are investigated by the Forestry Inspectorate (FI) and a decision is made following completion. of the investigation whether to proceed with a legal prosecution. It is Forest Service policy to initiate legal proceedings provided there is sufficient evidence for a successful prosecution and both State and private foresters can be prosecuted. Roughly 10% of reported cases end in prosecution. Many the reports usually relate to a small number or isolated trees being felled

	on (non- forestry) land, numbering only a few hectares in total. The felling of larger areas of forestry without a FL is less common although it has happened (typical 2ha - 4 ha). Larger areas 10ha + have occurred in the past mainly on State lands were usually due to error (a) on summary conviction, to a fine not exceeding €200 for every tree in respect of which the offence was committed (but which total penalty shall not exceed €5,000) or imprisonment for a term not exceeding 6 months or both, or (b) on conviction on indictment, to a fine not exceeding €1,000,000 or imprisonment for a term not exceeding 5 years or both. Breach of a felling licence condition: (a) on summary conviction, to a class A fine [i.e. a maximum fine of €5,000] or imprisonment for a term not exceeding 6 months or both, or (b) on conviction on indictment, to a fine not exceeding €25,000 or imprisonment for a term not exceeding 2 years or both. Failing to comply with a replanting order made by the Minister: (a) on summary conviction, to a class D fine [i.e. a maximum fine of €1,000] or (b) on conviction on indictment, to a fine not exceeding €5,000, for every period of 30 days during which such failure continues. rights and obligations in relation to felling licences. The principal set of regulations giving further effect to the Forestry Act 2014 are the Forestry Regulations 2017 (S.I. No. 191 of 2017). A forest owner wishing to apply for a felling licence is required to specify on the felling licence application and accompanying map the reforestation objective(s) s/he is proposing to pursue for the next rotation. The objective(s) must be indicated on the application, and not sought retrospectively Edenderry Power capture the supplier certification claim and or Felling Licence Details at the point of the delivery. Random checks are performed on Felling Licence Locations to ascertain ownership details via Forestry Licence Viewer. On site spot checks are performed on the sites with Interviews with the Forestry owner. These are captured within the Checklist as found in Annex 4 Forestry Licence Viewer (agriculture.gov.ie)
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	*In the Irish context EU designation (Natura 2000 sites, named SPA and SACs in Ireland) and national protection designations (NHA) will be used to denote areas with significant concentrations of biodiversity values. The steps required to provide legal protection to Ireland's terrestrial network of SACs and SPAs were largely completed between 2011 and 2016. A final formal designation of sites is underway,*

	although legal protection is already in place. That means that Natura 2000 is almost completely in place. *: SPAs and SACs collectively are known as Natura 2000 sites.* Natura 2000 in Ireland counts for 14% of the land. All Natura 2000 sites are covered by SAC, SPA or both designations. There are 6 **National Parks** (as per IUCN definition) under the control of the National Parks and Wildlife Service. In addition, Coillte operates 10 Parks and 150 recreational sites across the country. The basic designation for wildlife is the **Natural Heritage Area** (NHA). This is an area considered important for the habitats present or which holds species of plants and animals whose habitat needs protection. To date, 75 raised bogs have been given legal protection, covering some 23,000 hectares. These raised bogs are located mainly in the midlands. A further 73 blanket bogs, covering 37,000ha, mostly in western areas are also designated as NHAs. In addition, there are 630 proposed NHAs (pNHAs), which were published on a non-statutory basis in 1995 but have not since been statutorily proposed or designated. These sites are of significance for wildlife and habitats. The pNHAs cover approximately 65,000ha and designation will proceed on a phased basis over the coming years. Prior to statutory designation, pNHAs are subject to limited protection. The areas chosen as **SACs** (Special Areas of Conservation) in Ireland cover an area of approximately 13,500 sq. km. Roughly 53% is land, the remainder being marine or large lakes. The legal basis on which SACs are selected and designated is the EU Habitats Directive, transposed into Irish law in the 1976 All protected species are included in the Nature 2000 network of protected areas, and Natura 2000 is converted in SPAs and SACs in Ireland. In addition to the NHAs, there are 630 proposed NHAs (pNHAs), which were published on a non-statutory basis in 1995, but have not since been statutorily proposed or designated. in. The regulations and actions currently in place seems to be enough to safeguard any HCVs (High Conservation Value) occurring in these 630 sites. And besides this many of them are not forest related. The possibility that any HCV is harmed because of forest activities or felling trees seems to be very small. All NHA, SAC or SPA sites are also easily accessible and identifiable by online map systems. **Daily practice in the field and felling licenses.** For any landowner willing to harvest trees the ‘code of Best Forest Practice’ is applicable. These guidelines are aiming for the implementation of SFM within Ireland. Compliance with these publications is mandatory for all forestry activities that require prior written approval, or a license, from the Forest Service . In all cases the Felling licenses tools are in

	place, for state as well as private owners. See the overview text for more details. Furthermore, the Natura Impact Statement (NIS) and Forest Service Appropriate Assessment Procedure (AAP) are designed to proof that any harvesting operation will have no possibility of an impact arising on the identified conservation values of the forest (). Thus, it seems that all systems are in place to safeguard HCVs. Edenderry Power capture the supplier certification claim and or Felling Licence Details at the point of the delivery. Random checks are performed on Felling Licence Locations to ascertain ownership details via Forestry Licence Viewer Law enforcement and governance Following the granting of a Felling License, the Forestry Inspectorate Section of the Forest Service is responsible for monitoring that timber harvesting is following the conditions of the Felling License. Based on reports it seems that the number of cases with regards to illegal harvesting are minimal. On site spot checks are performed on the sites with Interviews with the Forestry owner. These are captured within the Checklist as found in Annex 4
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Conditions of a Felling Licence include the following: The licensee shall ensure that all felling and planting operation are carried out in accordance with Forestry and Water Quality, Forestry Biodiversity, Forest Harvesting and the Environment, Forestry and Archaeology, Forestry and the Landscape and Forestry and Aerial Fertilisation guidelines and the Code of Best Forest Practice – Ireland and the Irish National Forest Standard published by the Department, except as may otherwise be required in order to comply with the following conditions. Reason: In the interest of protection of the environment during harvesting and restocking of the felled area. 2) The licensee shall treat all conifer stumps with urea immediately upon tree felling where the soil type is mineral soil or where a peat soil is less that 25cm (excluding the litter layer). Treatment is not required where a conifer stand is being replanted with broadleaves, where the conifer is in a broadleaf stand is being removed or where broadleaves make up

	greater than 85% of the stand. Machine slippage and rutting during thinning and Clearfell operations also occur, adversely impacting on soil stability and tree growth (1). Soil displacement can occur at harvesting, with a consequent loss of organic matter and fertility). Further loss can occur from the burning of slash or its removal from poor soils. Damage can be reduced by carefully planning and supervising forest operations and by using low ground pressure vehicles or wide tyres, tracks and chains. Controlling loads and distributing slash along extraction routes and at rack headlands also contribute to ground protection (3). Limiting Clearfell coupe size and tight control on burning also maintain soil stability. Edenderry Power as part of the Supplier Audit Checklist review operations together with the conditions of the Felling Licence to ensure compliance with same in particular
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Irish felling safeguards support the maintenance of a forest's long-term productive capacity by requiring site-based harvest planning, controls on extraction and sediment loss, and provision for appropriate reforestation. Together, these measures help protect the site during harvesting and support the establishment of the next forest crop, rather than focusing solely on the immediate timber yield. Supporting reference: DAFM, Standards for Felling & Reforestation (October 2019) **In Ireland, the relevant safeguards are the felling licence's specific conditions together with DAFM's *Standards for Felling & Reforestation*.** The standards apply to licensed thinning, clearfelling and reforestation, with additional measures possible for sensitive sites.assets The provisions most relevant to maintaining the forest's **long-term productive capacity** are: **Provision** — **Relevance to future production** **Site-based Harvest Plan** — Plans extraction routes, machinery, landings and exclusion zones before harvesting.assets **Managing extraction and timing** — These are the key sections to examine for safeguards governing machinery use and

	operations	harvesting conditions.assets
	Silt, sediment and water protection	The standards address sediment control, water crossings and environmental setbacks.assets
	Planned reforestation	The Harvest Plan covers reforestation objectives, species selection and distribution, windrowing, drainage and cultivation.teagasc
	Monitoring and post-operation works	These are explicit parts of the standards and relevant to checking the site after harvesting.assets
(vi)[1] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(a)* ***primary forest*** *and other wooded land and* ***old growth forest,*** *namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of* ***old growth forest*** *at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.*		
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level	
Level A risk assessment description	N/A	
Level B management system at the level of the forest sourcing area	*\Ireland has several layers of control that help protect biodiverse forests, * **Controls in place** | **Control** | **How it helps protect biodiverse forest** | | --- | --- | | **Felling licensing** | DAFM's licensing framework regulates tree felling under the Forestry Act 2014 and supports sustainable forest management.gov | | **Protection of designated habitats** | Forestry applications undergo screening for effects on Special Areas of Conservation and Special Protection Areas. Where Appropriate Assessment is required, DAFM must establish that the project will not adversely affect the integrity of the relevant European sites before approving it through that process.teagasc | | **Site-specific harvesting safeguards** | The Harvest Plan identifies biodiversity features, habitats and machine-exclusion zones, allowing protective measures to be incorporated into harvesting operations.assets | | **Public scrutiny and appeals** | Forestry applications and assessment documents are subject to public consultation, with licence decisions open to appeal.gov |	
(vi)[2] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses		

referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	| **Control** | **How it operates** | | --- | --- | | **Identification of designated areas** | NPWS publishes protected-site boundaries, site documents and conservation objectives. These enable harvesting locations to be checked against Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Natural Heritage Areas (NHAs). (NPWS designated-site data; NPWS protected sites) | | **Felling licensing** | DAFM regulates felling under the Forestry Act 2014, providing a formal approval framework for harvesting operations. (DAFM, Tree Felling Licences) | | **Appropriate Assessment** | Forestry applications are screened for effects on SACs and SPAs. Where Appropriate Assessment is required, DAFM must establish that the proposal will not adversely affect the relevant sites' integrity before approval through that process. (Teagasc, Appropriate assessment procedures) | | **Site-specific consent requirements** | Where assigned to a European site, Activity Requiring Consent ARC-28 covers "Felling of trees or removing timber, including dead wood". Prior consent is required from the relevant competent authority; carrying out an applicable activity without consent is an offence. (NPWS, Activities Requiring Consent; NPWS, Approved ARC List (ARC-28)) | | **NHA protection** | Certain works listed in an NHA's designation require prior ministerial consent, enabling assessment and the attachment of protective conditions. (NPWS, Activities Requiring Consent) |
(vi)[3] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.*	

Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	**For highly biodiverse grassland, the important control is preventing inappropriate conversion to forest—not just checking the eventual felling licence.** Ireland's afforestation approval process assesses environmental suitability before planting, including biodiversity considerations.<button type="button" class="fai-BebopCitation rju2gik ___1r5iikm f16gbxbe f1fflrab f1taa2r1 fbyavb5 fz5stix fmrv4ls f18h1x8q f1g61d47" tabindex="0" data-tabster="{"restorer":{"type":1}}">teagasc</button> ### Relevant controls in Ireland | Control | How it helps protect highly biodiverse grassland | | --- | --- | | **Prior approval for afforestation** | DAFM requires prior written technical approval for afforestation. This assesses compliance with environmental and silvicultural requirements before planting proceeds.<button type="button" class="fai-BebopCitation rju2gik ___1r5iikm f16gbxbe f1fflrab f1taa2r1 fbyavb5 fz5stix fmrv4ls f18h1x8q f1g61d47" tabindex="0" data-tabster="{"restorer":{"type":1}}">teagasc</button> | | --- | --- | | **High Nature Value Farmland procedure** | DAFM's *Environmental Requirements for Afforestation* includes a dedicated High Nature Value Farmland procedure, providing a mechanism for examining sensitive farmland at the application stage.<button type="button" class="fai-BebopCitation rju2gik ___1r5iikm f16gbxbe f1fflrab f1taa2r1 fbyavb5 fz5stix fmrv4ls f18h1x8q f1g61d47" tabindex="0" data-tabster="{"restorer":{"type":1}}">irishriverproject</button> | | --- | --- | | **Habitat identification and mapping** | DAFM procedures include habitat mapping and identification of grasslands with differing species composition and richness. This helps distinguish sensitive grassland from other proposed planting land.<button type="button" class="fai-BebopCitation rju2gik ___1r5iikm f16gbxbe f1fflrab f1taa2r1 fbyavb5 fz5stix fmrv4ls f18h1x8q f1g61d47" tabindex="0" data-tabster="{"restorer":{"type":1}}">assets</button> | | --- | --- | | **Assessment of protected habitats** | The environmental requirements include criteria references for identifying Annex I habitats. Afforestation applications also undergo screening for effects on SACs and SPAs, with Appropriate Assessment where required.<button type="button" class="fai-BebopCitation rju2gik ___1r5iikm f16gbxbe f1fflrab f1taa2r1 fbyavb5 fz5stix fmrv4ls f18h1x8q f1g61d47" tabindex="0" data-tabster="{"restorer":{"type":1}}">irishriverproject+1</button> | | --- | --- | | **Consultation and appeals** | Afforestation applications are publicly available for consultation, and decisions can be appealed, allowing ecological concerns to be raised before planting.<button type="button" class="fai-BebopCitation rju2gik ___1r5iikm f16gbxbe f1fflrab f1taa2r1 fbyavb5 fz5stix fmrv4ls f18h1x8q f1g61d47" tabindex="0" data-tabster="{"restorer":{"type":1}}">teagasc</button> | | --- | --- |

(vi)[4] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:
*(e) **heathland** - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*

Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	**For heathland, the key issue is whether the forest was established through conversion of heathland—not simply whether harvesting is licensed today.** Ireland's relevant safeguards operate principally through afforestation approval, habitat assessment and protected-site controls. teagasc+1 ### Controls in place in Ireland | Control | How it helps protect heathland | | --- | --- | | **Prior afforestation approval** | DAFM requires prior written technical approval for afforestation, assessing environmental and silvicultural suitability before planting. teagasc | | --- | --- | | **Habitat assessment** | DAFM's environmental requirements address biodiversity sensitivities and include references for identifying Annex I habitats. NPWS publishes habitat information for wet heath, dry heath and alpine/subalpine heath, supporting their identification during assessment. irishriverproject+1 | | --- | --- | | **Protection of designated heathland** | Afforestation applications undergo screening for effects on SACs and SPAs. Where Appropriate Assessment is required, approval through that process depends on establishing no adverse effect on site integrity. teagasc | | --- | --- | | **Consent for potentially damaging activities** | Activities assigned to a European site require prior consent. Relevant activities can include planting trees, soil disturbance and drainage, enabling assessment before works proceed. npws+1 | | --- | --- | | **Soil and fertility eligibility** | The Afforestation Scheme excludes land that fails its soil-type or fertility requirements. These are additional eligibility filters, **not a substitute for assessing whether the habitat is heathland**. assets | | --- | --- | | **Hen harrier safeguards** | DAFM operates afforestation assessment procedures addressing hen harrier habitat, including heather-dominated breeding habitat and heathland used for foraging or roosting. assets | | --- | --- |
(vi)[5] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under	

the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a)* ***wetlands,*** *namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	**Ireland's controls help prevent inappropriate wetland conversion and damaging drainage, but they do not prove that every forest supplying biomass was never wetland.** The relevant safeguards begin with approval and assessment before afforestation.<button type="button" class="fai-BebopCitation rju2gik ___1r5iikm f16gbxbe f1fflrab f1taa2r1 fbyavb5 fz5stix fmrv4ls f18h1x8q f1g61d47" tabindex="0" data-tabster="{"restorer":{"type":1}}">teagasc</button> ### Controls relevant to wetland protection | Control | How it operates | | --- | --- | | **Prior afforestation approval** | DAFM assesses environmental suitability before granting technical approval to plant, providing a checkpoint before land-use change.<button type="button" class="fai-BebopCitation rju2gik ___1r5iikm f16gbxbe f1fflrab f1taa2r1 fbyavb5 fz5stix fmrv4ls f18h1x8q f1g61d47" tabindex="0" data-tabster="{"restorer":{"type":1}}">teagasc</button> | | --- | --- | | **Soil-type eligibility restrictions** | Under the Afforestation Scheme, soil types outside the specified eligible categories must be excluded. Modified fens and modified cutaway raised bogs are eligible only for specified native woodland creation, where the woodland can establish **without further drainage**.<button type="button" class="fai-BebopCitation rju2gik ___1r5iikm f16gbxbe f1fflrab f1taa2r1 fbyavb5 fz5stix fmrv4ls f18h1x8q f1g61d47" tabindex="0" data-tabster="{"restorer":{"type":1}}">assets</button> | | --- | --- | | **Habitat and water assessment** | DAFM's environmental requirements address biodiversity sensitivities, water setbacks, drainage, cultivation and water crossings during design and site works.<button type="button" class="fai-BebopCitation rju2gik ___1r5iikm f16gbxbe f1fflrab f1taa2r1 fbyavb5 fz5stix fmrv4ls f18h1x8q f1g61d47" tabindex="0" data-tabster="{"restorer":{"type":1}}">irishriverproject</button> | | --- | --- | | **Protection of designated wetlands** | Forestry applications are screened for effects on SACs and SPAs. Where Appropriate Assessment is required, approval through that process depends on establishing no adverse effect on site integrity.<button type="button" class="fai-BebopCitation rju2gik ___1r5iikm f16gbxbe f1fflrab f1taa2r1 fbyavb5 fz5stix fmrv4ls f18h1x8q f1g61d47" tabindex="0" data-tabster="{"restorer":{"type":1}}">teagasc</button> | | --- | --- | | **Consent for drainage and other works** | Where assigned to a European site, activities including drainage, watercourse alteration and tree planting require prior consent. Certain works in NHAs also require permission under the relevant designation.<button type="button" class="fai-BebopCitation rju2gik ___1r5iikm f16gbxbe f1fflrab f1taa2r1 fbyavb5 fz5stix fmrv4ls f18h1x8q f1g61d47" tabindex="0" data-tabster="{"restorer":{"type":1}}">npws+1</button> | | --- | --- |
(vi)[6] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under	

the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was **peatland** in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	| Control | How it protects peatlands | | --- | --- | | **Prior afforestation approval** | DAFM assesses environmental suitability before granting technical approval to plant, providing a checkpoint before land-use change. teagasc | | --- | --- | | **Soil eligibility and peat-depth assessment** | DAFM's *Land Types for Afforestation* specifies eligible soil categories and soil-survey methods. Land outside those categories must be excluded from applications under the Afforestation Scheme. assets | | --- | --- | | **Restricted planting on modified peatland** | Modified fens and modified cutaway raised bogs are eligible only for specified native woodland creation where the woodland can establish **without further drainage**. assets | | --- | --- | | **Protection of designated bogs and associated habitats** | Forestry applications undergo screening for effects on SACs and SPAs. Where Appropriate Assessment is required, approval through that process depends on establishing no adverse effect on site integrity. teagasc | | --- | --- | | **Consent for drainage and other works** | Where assigned to a European site, drainage, soil disturbance and tree planting require prior consent. Certain works within NHAs also require permission under the relevant designation. npws+1 | | --- | --- | | **Biomass sustainability verification** | SEAI's published procedure requires supporting sustainability information and verification/auditing for participants within its scope. seai | | --- | --- | | Check | Evidence and decision | | --- | --- | | **Identify the source land** | Obtain mapped harvesting-compartment boundaries and link deliveries to those compartments. | | --- | --- | | **Establish January 2008 status** | Review historical peat/soil maps, aerial imagery, planting records and ecological surveys. Current tree cover alone should not be accepted as proof that the land was not peatland. | | --- | --- | | **Establish drainage history** | Record when drainage was installed, its extent and the areas it affected, supported by dated plans, imagery or other reliable records. | | -

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(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	*Not applicable, requirement only applies to Level A*

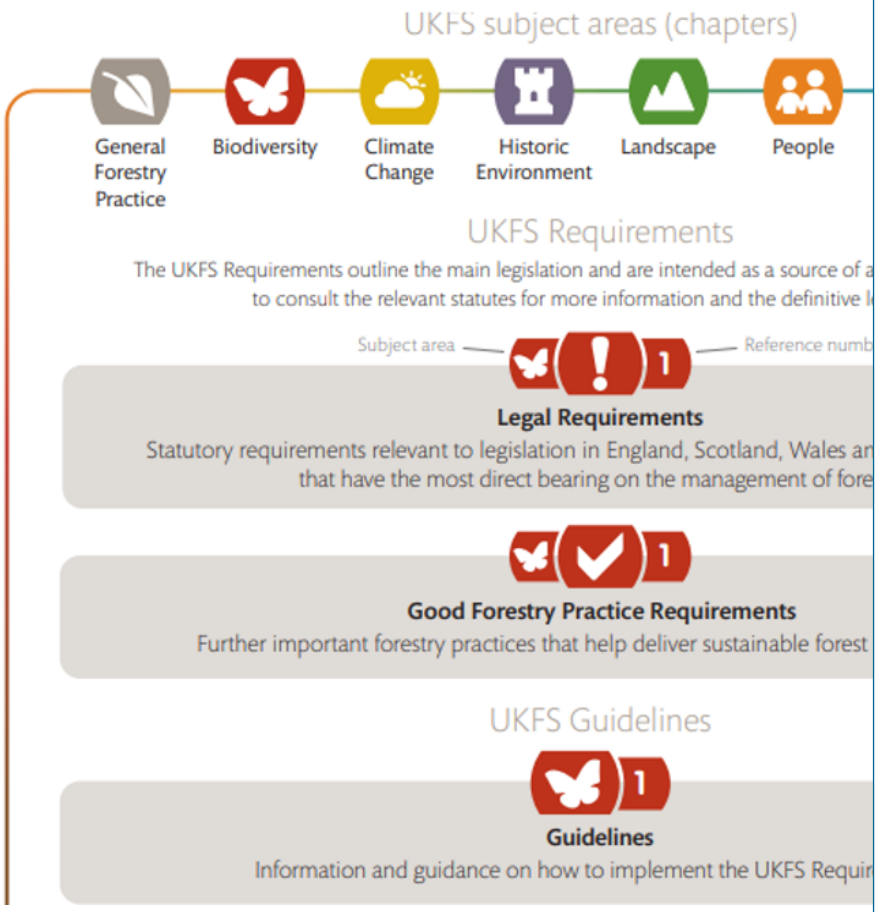
LULUCF criteria 29(7)	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-endorsed EU RED Level A risk assessment for Article 29(7) LULUCF_v1.4
Level B management system at the level of the forest sourcing area	N/A

Countries where EU RED Supply Base Evaluation is used	
Country	United Kingdom
Area	0.12
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	In Northern Ireland, the department of Agriculture, Environment and Rural Afairs (dAERA) is responsible for setting and implementing environmental and land management policy. Forest Service delivers the department's policy and legislative responsibilities in relation to forestry and plant health, including the management of public forests, and regulates the sector in conjunction with its grant schemes and by issuing felling licences. Forest Policy is outlined in Northern Ireland Forestry: A

	Strategy for Sustainability and Growth. delivery against this strategy supports overarching and cross-cutting dAERA strategies including those for green growth, peatland and the environment. The UKFS is monitored via compliance with existing grant and regulatory approvals. Where non-compliance is identifed and breaches have occurred, corrective actions are identifed by the relevant authority. If corrective actions are not undertaken, then escalation is through regulatory mechanisms where funding can be reclaimed or permissions can be suspended or revoked. Edenderry Power as part of its auditing process completes a supplier declaration with delivery source data retained within the BIMs management system for review,
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The UK Forestry Standard (UKFS) is the technical standard for sustainable forest management in the UK. It sets out the approach of the four governments of the UK, and defines the requirements and provides guidance for foresters on how to practise sustainable forest management in the UK. In this way, it provides a basis for operating grant schemes and official controls and support for regulatory processes. It also provides the foundation for a number of voluntary certification and quality assurance schemes used in the UK, and for assessing compliance with environmental management standards. Edenderry Power as part of its auditing process completes a supplier declaration with delivery source data retained within the BIMs management system for review,
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Edenderry Power as part of its auditing process completes a supplier declaration with delivery source data retained within the BIMs management system for review, Habitat restoration and creation within a forest is not confined to the woody elements, as a range of other habitats and micro-sites contribute to the wider forest environment. Much can be made of sites that are inaccessible or wet and therefore unsuitable for timber production, and they can greatly extend the potential for biodiversity. The management of

	drainage offers many opportunities through the creation of ponds and wetlands in buffer areas for the seepage of water. Some forests have been established on what are now recognised as priority open-ground habitats, such as bogs and heaths. Although there is a general presumption against deforestation, some of these sites may have potential for restoration where this offers significant and demonstrable benefits for biodiversity and climate change mitigation. Any change from woodland to non-woodland habitat needs to be compliant with the country's policy on woodland removal and, where deforestation is proposed, an EIA is likely to be required. All the various implications, including the practicality of habitat restoration, will need to be considered in the context of policies at country level on woodland removal.
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Soil compaction is an increase in soil bulk density and a reduction in pore space due to compression. This affects the movement of water and air through the soil, reducing water infiltration and storage, and increasing the risk of water run-of and erosion. Compaction may also affect the growth and functioning of roots and soil organisms, which in turn can adversely affect tree stability and growth. natural processes such as freeze–thaw cycles, wetting–drying cycles and root penetration can mitigate compaction and, in some situations, these processes can restore soils to their original condition over time. However, on some soil types, compaction is virtually irreversible. The ground pressure of heavy machines used for harvesting or forwarding timber can compact the soil and cause rutting and puddling (peaty and clayey soils being the most vulnerable), particularly with frequent passes over a sustained period and when logs are skidded along the ground. Compaction to topsoil can usually be ameliorated, but damage to the subsoil (greater than 20 cm depth) is more difficult to rectify. Brownfield sites are often subject to repeated vehicle traffic during restoration, leading to severe compaction. Soils with a previous history of intensive grazing can be compacted and agricultural ploughing sometimes leads to a compacted layer just below the reach of the plough. Soil stacked temporarily, for example, for road construction and mineral extraction, can become compacted and degraded if it is stacked too high and for too long. Compaction, leading to rutting and erosion, can be

	minimised by good planning and management of forest operations, such as using extraction routes made from layers of fresh brash to spread the load. A well-designed road infrastructure, with stacking and turning areas, will help minimise skidder haul tracks and other incidental causes of compaction on forest soils. Machine choice and working method affects the ground pressure and the risk of damage. Wheeled vehicles pose the greatest risk, but the use of lower tyre pressures and controls on the frequency and speed of vehicle movements can reduce this. Tracked vehicles exert less ground pressure, while cable extraction poses virtually no risk of compaction and is the least environmentally disruptive for particularly sensitive sites. dry soils have a greater UK FORESTRY STANDARD 104 bearing capacity than wet soils and so harvesting in dry periods reduces the risk of compaction. Compacted soils may require remedial treatment, such as subsoiling, carefully matched to the depth of compaction, to minimise the extent of disturbance. 6 Minimise compaction, rutting and erosion during forest operations by selecting the most appropriate working method for site conditions; monitor operations and modify, postpone or stop procedures if soil damage starts to occur. 7 on sites vulnerable to compaction and erosion, consider the weather and avoid working during periods of heavy or exceptional rainfall; plan ahead for changes in the weather that could affect site conditions, and suspend operations if necessary. 8 Maintain adequate brash mats throughout extraction where operations provide this material. if brash is not available, use other techniques to protect the soil. 9 Where compaction has occurred and will affect tree growth or lead to other detrimental effects, apply remedial treatment, but minimise the soil disturbance involved. Edenderry Power as part of the Supplier Audit Checklist review operations together with the conditions of the Felling Licence to ensure compliance with same in particular
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Edenderry Power as part of its auditing process completes a supplier declaration with delivery source data retained within the BIMs management system for review, Forest owners, managers and contractors are responsible for ensuring that forest operations and activities are delivered in accordance with the

	UKFS, and this is a prerequisite for the approval of forest plans, felling and replanting operations, woodland creation proposals and forestry grants. 
(vi)[1] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(a) **primary forest** and other wooded land and **old growth forest,** namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of **old growth forest** at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A

Level B management system at the level of the forest sourcing area	The UK Forestry Standard provides a sustainable forest management framework, while protected-site consent can allow forestry operations subject to safeguards. Neither UK origin nor a felling approval alone substantiates the claim “this biomass is not sourced from highly biodiverse forest”. [UK Forestry Standard](https://www.gov.uk/government/publications/the-uk-forestry-standard); [Woodland protected-site consent](https://www.gov.uk/guidance/sites-of-special-scientific-interest-on-or-near-woodland). Edenderry Power as part of its auditing process completes a supplier declaration with delivery source data retained within the BIMs management system for review, | **Control** | **Protection provided and evidential limit** | | --- | --- | | **UK-wide forestry framework** | **The UK Forestry Standard covers biodiversity and applies to woodland irrespective of ownership. The Forestry Commission, Scottish Forestry, Natural Resources Wales and Northern Ireland Forest Service assess forestry proposals against it and check regulatory compliance, with implementation differing between countries. This provides a common management framework, not a certificate that a forest is outside the “highly biodiverse” category. ** | | --- | --- | | **Harvest approval and enforceable environmental safeguards** | Country-specific felling controls provide a means of scrutinising harvesting proposals. For example, Northern Ireland permits environmental conditions on relevant felling licences and allows licences to be amended, suspended or revoked to address environmental harm or newly identified sensitivities. These powers protect biodiversity during operations; they do not establish that the source forest has low biodiversity. | | **Additional protection for designated forest habitats** | Where a forest is designated, site-specific consent adds safeguards. In Northern Ireland ASSI consent can accompany forestry approval and impose additional conditions. This illustrates why licensed timber may still originate in a protected forest. Use the country-specific designated-area controls in the preceding section where applicable; designation status and biodiversity classification must not be treated as interchangeable. | | --- | --- |
(vi)[2] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(b) **highly biodiverse forest** and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level

Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Edenderry Power as part of its auditing process completes a supplier declaration with delivery source data retained within the BIMs management system for review, UK designated-site controls regulate potentially damaging operations; they do not impose an automatic exclusion of all timber or biomass from designated areas. For example, forestry work within an English Site of Special Scientific Interest (SSSI) can proceed with the relevant consents and conditions. Consequently, a felling approval alone does not demonstrate that biomass originates outside a designated area. [Forestry Commission and Natural England: woodland SSSI controls](https://www.gov.uk/guidance/sites-of-special-scientific-interest-on-or-near-woodland). In Northern Ireland the categories are defined as Areas of Special Scientific Interest (ASSIs) in Northern Ireland | **Jurisdiction / control** | **How it protects designated areas** | | --- | --- | | **Northern Ireland — ASSI consent and mapped works** | **Each ASSI citation has a schedule of notifiable operations that require NIEA consent; these can include tree felling and ditch excavation. The consent process uses site-specific information and maps showing where operations will occur. It controls potentially damaging work but does not exclude all biomass originating in an ASSI. ** | | --- | --- |
(vi)[3] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(d) **highly biodiverse grassland** spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Edenderry Power as part of its auditing process completes a supplier declaration with delivery source data retained within the BIMs management system for review, The UK Forestry Standard (UKFS) provides the common sustainable forest management framework across

	England, Scotland, Wales and Northern Ireland. The respective forestry authorities assess proposals against it, although implementation arrangements differ between countries. Source: UK Forestry Standard. Northern Ireland — forestry EIA and public scrutiny DAERA Forest Service forms opinions on proposed projects under the Environmental Impact Assessment (Forestry) Regulations (Northern Ireland) 2006, as amended. Afforestation submissions include location maps, site plans and project descriptions; environmental effects are considered, public comments invited and opinions recorded in a public register. These records provide a route for checking how the original woodland creation proposal was assessed. Forestry environmental impact assessments.
(vi)[4] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:* *(e) **heathland** - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Edenderry Power as part of its auditing process completes a supplier declaration with delivery source data retained within the BIMs management system for review, | Control | How it helps protect heathland | | --- | --- | | **UK Forestry Standard (UKFS)** | Provides the common sustainable forestry framework. Forestry authorities in England, Scotland, Wales and Northern Ireland assess proposals against it and monitor compliance; implementation differs between countries. | | | | | **Northern Ireland: forestry environmental assessment** | Forest Service assesses proposals under its forestry EIA regulations, using mapped project information, environmental assessment and public consultation. | | | | | **Protected-site controls** | For example, in Northern Ireland, listed operations on heathland designated as an ASSI require consent or an applicable authorisation route, providing additional protection against damaging management changes. | | | |
(vi)[5] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under	

the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: (a) **wetlands,** namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).*	
Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Edenderry Power as part of its auditing process completes a supplier declaration with delivery source data retained within the BIMs management system for review, | Control | How it helps protect wetlands | | --- | --- | | **UK Forestry Standard (UKFS)** | Provides the common sustainable forestry framework across England, Scotland, Wales and Northern Ireland. Forestry authorities assess proposals against it and monitor compliance. | | | | | **Protection of wetland hydrology** | UKFS good forestry practice states that new forests should not be established where they would compromise the hydrology of adjacent bog or wetland habitats. | | | | | **Environmental assessment before land-use change** | Forestry EIA processes assess potentially significant environmental effects. Northern Ireland operates its own forestry EIA assessment process. | | | | | **Habitat, water and soil checks** | Northern Irelands afforestation assessment asks applicants to identify priority habitats, water features, sensitive sites and peaty soils, including features outside the planting boundary that could be affected. | | | | | **Protected-site consent** | In Northern Irelands controls can cover drainage, vegetation clearance and changes in management. | | | | | **Harvesting safeguards** | UKFS supporting guidance addresses operational planning, buffer areas, soil disturbance, water movement and pollution prevention to protect freshwater habitats, including wetlands. | | | |
(vi)[6] That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. *Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was **peatland** in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.*	

Type of Risk Assessment used	☐Level A – proof at national or sub-national level ☒Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Edenderry Power as part of its auditing process completes a supplier declaration with delivery source data retained within the BIMs management system for review, Controls in place in the UK Forestry is devolved. The UK Forestry Standard provides the common framework, implemented by the Northern Ireland Forest Service. | Control | How it protects peatlands | | --- | --- | | **Restrictions on new woodland creation** | UKFS good forestry practice states that new forests should not be established on peat exceeding **50 cm**, or the depth specified in country guidance, or where planting would compromise adjacent bog or wetland hydrology. | | | | | **Northern Ireland: environmental assessment** | Forest Service assesses forestry proposals under the Environmental Impact Assessment (Forestry) Regulations, with project information, environmental consideration and public consultation. | | | | | Check | Required evidence or action | | --- | --- | | **Identify the source** | Map each harvesting compartment and connect incoming biomass consignments to it. | | | | | **Determine January 2008 status** | Review historical soil/peat maps, aerial photographs, planting records and ecological surveys. Record uncertainty rather than treating missing information as proof of non-peatland status. | | | --- | | **Establish drainage history** | Obtain dated drainage plans, installation records and evidence of the extent of soil previously drained. | | | |
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒Level A – proof at national or sub-national level ☐Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	*Not applicable, requirement only applies to Level A*

LULUCF criteria 29(7)	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-endorsed EU RED Level A risk assessment for Article 29(7) LULUCF_v1.4
Level B management system at the level of the forest sourcing area	N/A

Annex 2a: EU RED II Supply Base Evaluation

Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements

☐ Not Applicable (Processing Residues and/or post-consumer feedstock not used)

Verification and monitoring of suppliers

Sawmill Residues in the form of Woodchip and Sawdust are provided from Local Sawmills, suppliers are monitored with completion of the Secondary Feedstock Checklist document (See below) during site visits which are carried on a periodic basis to ensure compliance. Edenderry Power maintains strong working relationships with the sawmilling sector and engages on policy initiatives and events advocating for the work of the sawmilling and forestry sectors.

BnM Renewable Energy

Secondary Feedstock Site Visit

Form RF 10023 Rev 1

Site Identification:

Supplier Name:		Supplier Inventory System Number *(if existing)*	
Site Name:		Distance From Power Station (km)	
Address			
		History - New Source: ☐ or Existing: ☐ ✓*as applicable*	
		Notes:	

Include relevant documented type or explanation below

Source Type	Sawmill	☐	FSC Certificate Details	
(Choose one) ✓	Wood Processor	☐	FSC Claim	
	Other Source	☐	Felling Licence No. (TFL) Records of Raw Material Source	

Eircode (if known)	

General Observations:

Secondary Feedstock requirements are being met – if applicable? ✓	☐	*if no add detail below*
Has the supplier a Safety Statement or other safety documents for the site? ✓	☐	
Has the supplier completed the RED III Self Declaration Sheet ✓	☐	

General Notes and Observations: - may include references to FSC Search

Interview with Supplier and Comments

Notes: *Species, Product Suitability, Site Environmental Management, Site access and egress arrangements*

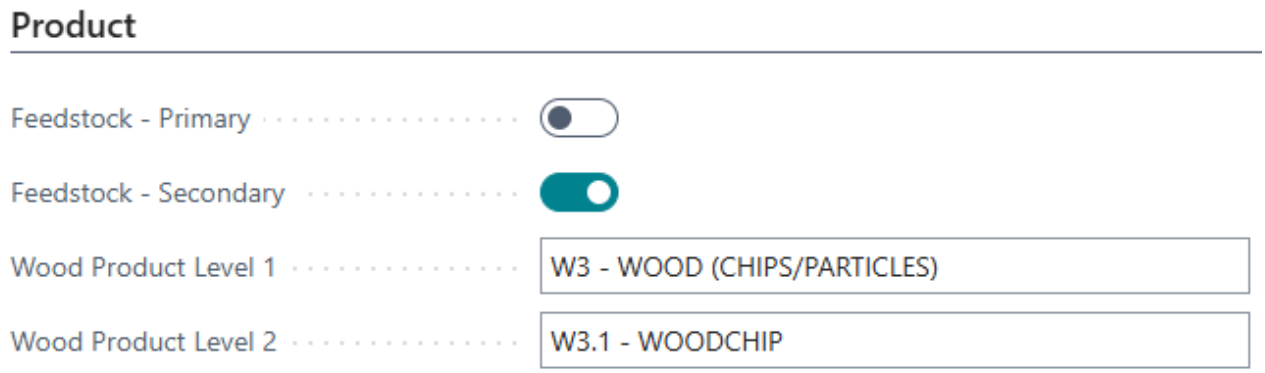
Signed on behalf of Edenderry Power ---------- **Date:** ----------

Signed on behalf of the Supplier ---------- **Date:** ----------

Retention 10 Years | Bord Na Mona Renewable Energy | Page 1 of 1

Feedstock inspection and classification upon receipt

Yes carried out on site by the Fuel Delivery Management Team, the delivery data is captured via the BIMs inventory system with feedstock type assigned to it upon delivery and inspection by on site team per screenshot



below

Supplier audit for processing residues and post-consumer feedstock

Secondary Feedstock Checklist document (see below) during site visits which are carried on a periodic basis and are available to view, analysis of products is carried out in on site ISO accredited laboratory. Supplier Self Declarations on the production of Residues in line with RED III is completed by suppliers.

BnM Renewable Energy

Secondary Feedstock Site Visit

Form RF 10023 Rev 1

Site Identification:

Supplier Name:		Supplier Inventory System Number *(if existing)*	
Site Name:		Distance From Power Station (km)	
Address			
		History - New Source: ☐ or Existing: ☐ ✓*as applicable*	
		Notes:	

Include relevant documented type or explanation below

Source Type	Sawmill	☐	FSC Certificate Details	
(Choose one) ✓	Wood Processor	☐	FSC Claim	
	Other Source	☐	Felling Licence No. (TFL) Records of Raw Material Source	

Eircode (if known)	

General Observations:

Secondary Feedstock requirements are being met – if applicable? ✓	☐	*if no add detail below*
Has the supplier a Safety Statement or other safety documents for the site? ✓	☐	
Has the supplier completed the RED III Self Declaration Sheet ✓	☐	

General Notes and Observations: - may include references to FSC Search

Interview with Supplier and Comments

Notes: *Species, Product Suitability, Site Environmental Management, Site access and egress arrangements*

Signed on behalf of Edenderry Power ---------- **Date:** ----------

Signed on behalf of the Supplier ---------- **Date:** ----------

Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For "Trees outside forests (TOF) – Urban and landscape feedstock" no EU RED sustainability requirements apply, only the GHG savings criteria apply (SBP EU RED Bridging ID v2.0 Section 1.1). The land use category in this case is neither forest land nor agricultural land. For "Trees outside forests (TOF) – Agricultural land feedstock" the applicable criteria are Article 29 paragraphs (2)-(5).

Country: Ireland - 0.73

Article 29 (2): Soil quality and soil carbon	
Biomass fuels produced from waste and residues derived not from forestry but from agricultural land shall be taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 only where operators or national authorities have monitoring or management plans in place in order to address the impacts on soil quality and soil carbon. Information about how those impacts are monitored and managed shall be reported pursuant to Article 30(3).	
(i) Impacts on soil quality	
Step 1: Identification of applicable laws	
Have the applicable law(s) been identified?	Yes
List of applicable law(s)	S.I. No. 31 of 2014 S.I. No. 588/2025,
Sources	2025 Regulations; DAFM: current nitrates legislation. . European Commission: conditionality and legal basis; DAFM: soil-related GAEC requirements.
Step 2: Description of enforcement and monitoring by competent authorities	
Description of the practical implementation and monitoring of the law(s)	Breaches may result in fines ranging from 1,000 to 6,000. Enforcement is carried out by the National Parks and Wildlife Service (NPWS) and An Garda Síochána.
Sources	To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track

	biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions:
Is the enforcement and monitoring ensured for the identified law(s)?	Yes
Step 3: Evaluation of the effectiveness of the legal framework	
Evaluation of the practical implementation of the law(s) and explanation for the evaluation	Strong Level of Adherence noted within supply base, refer to supplier review checklists for further details
Sources	https://www.midlands103.com/news/midlands-news/offaly-landowner-prosecuted-for-destruction-of-vegetation/
Is legal framework effective?	Yes
Step 4: Detailed description of a management plan and monitoring at economic operator level	As part of the supplier audit and subsequent TOF checklist completion, the economic operator should be able to illustrate: The maintenance of the soil's productive and ecological functions throughout establishment, crop growth, harvesting and eventual crop removal. Monitor chemical fertility, physical structure, water movement, organic matter and biological condition together. Repeated physical examination and chemical testing as complementary approaches to assessing soil health. soil-health physical examination. • Prevent avoidable erosion, compaction, rutting and pollution. • Maintain crop-appropriate pH and balanced nutrition within legal application allowances. • Detect deterioration early using repeatable measurements against a documented baseline. • Protect carbon-rich soils and sensitive habitats; do not assume that energy-crop production automatically improves soil carbon. • Demonstrate what was checked, what was found, what action followed and whether that action worked. Indicator When to monitor Responsibility and interpretation Fertility: pH, P and K Baseline; proposed repeat every 3 years, sooner after a material problem or on adviser instruction. Never exceed the applicable legal validity period. Soil-management lead and laboratory; compare with crop-specific targets and legal nutrient allowances. Update the nutrient plan before applications. Teagasc describes a 4-year validity period for nutrient tests, distinct from this proposed shorter management cycle. Sampling guidance. Organic matter / organic carbon Baseline; proposed repeat every 3–5 years using a consistent protocol, and review after major land-use change. Adviser and laboratory; investigate persistent decline after allowing for variability. Do not interpret one small change as a proven trend or carbon-stock change. Structure, roots and compaction Baseline; annually at comparable conditions, before harvest and after harvest where damage is suspected. Trained field inspector; compare permanent observation locations, headlands, wheelings and representative crop areas. Use the same visual scoring system and photographs. Soil cover, erosion and runoff Proposed monthly checks during establishment; before/after major operations and after severe rainfall when safe. Field operator; record bare patches, rills, sediment movement, buffer condition and standing water. Investigate new problems rather than waiting for the annual review. Trafficability and harvest damage Before every machinery operation; reassess when weather or field conditions change; post-operation inspection. Operator and manager; record go/no-go decision, field moisture, route and machinery. Stop and reassess if rutting, smearing or structural damage develops.
(ii) Impact on soil carbon	

Step 1: Identification of applicable laws	
Have the applicable law(s) been identified?	Yes
List of applicable law(s)	European Communities (Environmental Impact Assessment) (Agriculture) Regulations 2011 — S.I. No. 456/2011, as amended
Sources	Law or control Relevance to biomass production Implementation and enforcement European Communities (Environmental Impact Assessment) (Agriculture) Regulations 2011 — S.I. No. 456/2011, as amended Covers specified rural restructuring, bringing uncultivated or semi-natural land into intensive agriculture, and agricultural drainage. Screening can be required below normal thresholds where environmental sensitivities arise.gov DAFM determines screening and consent applications. Where consent is required, works must not proceed without it. The legislation provides for prohibition notices, reinstatement, authorised officers and prosecution.gov+1 Planning controls for wetland drainage or reclamation Wetland drainage/reclamation is excluded from the agricultural EIA route described above and is dealt with through planning provisions. It should not be treated as ordinary agricultural drainage.assets Establish the correct consent route with the planning authority before works; an agricultural screening decision should not be assumed to replace planning requirements.assets CAP conditionality — GAEC 2 Applies to relevant CAP beneficiaries and mapped parcels. Requirements include restrictions on deep ploughing and new drainage; maintaining existing drains must not become unapproved deepening or extension.gov+1 Implemented through DAFM's parcel mapping, conditionality controls and payment-penalty system. GAEC 2 does not replace separate planning or nature-conservation obligations.gov+1 European Union (Good Agricultural Practice for Protection of Waters) Regulations 2025 — S.I. No. 588/2025, as amended, including S.I. No. 119/2026 Applies to holdings and fertiliser applications, with requirements covering nutrient management, storage, spreading, cultivation and records. These are primarily water-protection controls—not proof of soil-carbon sequestration.irishstatutebook+1 Local authorities undertake risk-based farm inspections under the EPA-overseen National Agricultural Inspection Programme, with follow-up, enforcement and cross-reporting mechanisms.epa European Union (Renewable Energy) Regulations (2) 2022 — S.I. No. 350/2022 Establishes a biomass sustainability framework; SEAI's associated procedure addresses sustainability and greenhouse-gas evidence for relevant support-scheme or renewable-energy-obligation participants.irishstatutebook+1 SEAI's published procedure provides for annual information, independent verification/auditing and review. Confirm the applicable amendments, installation scope and current procedure before relying on the 2022 framework.seai
Step 2: Description of enforcement and monitoring by competent authorities	
Description of the practical implementation and monitoring of the law(s)	Protected sites require an additional check: DAFM guidance identifies SACs, SPAs, NHAs, proposed NHAs and nature reserves as potentially relevant to screening, consent and assessment requirements.
Sources	To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined

	below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions:
Is enforcement and monitoring ensured for the identified law(s)?	Yes
Step 3: Evaluation of the effectiveness of the legal framework	
Evaluation of the practical implementation of the law and explanation for the evaluation	1. Establish a baseline: map each plot; record previous land use, soil classification, peat presence, existing drains and protected-site constraints. 2. Create a consent register: retain screening decisions, permissions, relevant nature-conservation approvals and all operating conditions. 3. Control operations: document cultivation, drainage maintenance, fertiliser applications, harvesting and any soil damage. 4. Measure carbon separately: commission a competent soil scientist to design repeat sampling, including sampling depth, bulk density and a consistent stock-comparison method. Do not rely on carbon concentration alone. 5. Monitor higher-risk plots: prioritise peat soils, drainage changes and land-use conversion for inspection and specialist review. 6. Close out non-compliance: record corrective actions, responsible roles, completion evidence and verification before approving further sourcing.
Sources	Implemented through DAFM's parcel mapping, conditionality controls and payment-penalty system. GAEC 2 does not replace separate planning or nature-conservation obligations.gov+1
Is legal framework effective?	Yes
Step 4: Detailed description of a management plan and monitoring applied at economic operator level	The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Management stage Controls to implement Evidence to retain Site Assessment Identify each plot; record previous land use, mineral/organic soil, peat depth where relevant, drains, watercourses and designations. Plot maps, soil information, historical imagery, site photographs and landowner declaration. Risk Assessment & Mitigation Separately assess land-use-change, peat, drainage, erosion, compaction and nutrient risks. Refer uncertain or high-risk plots for specialist review. Signed risk assessment, specialist findings and mitigation plan. Legal Approval Maintain a plot-level legal register. Do not authorise relevant works until required decisions and consents are documented. Screening decisions, permissions, consents, conditions and regulator correspondence. Operational Controls Issue contractor instructions covering approved work areas, drainage restrictions, ground conditions, buffers and incident response. Work instructions, contractor briefings, cultivation and drainage logs, nutrient records and harvest records. Monitoring & Reporting Inspect before establishment, after material drainage/cultivation works, and following harvest. Commission a specialist-designed soil-carbon monitoring programme where carbon outcomes are claimed. Inspection reports, repeat photographs, laboratory results, sampling locations and corrective actions.

Article 29 (3a): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: *(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located.* *;*	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions:

Article 29 (3b): Protection of land with high biodiversity value	
Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: ***(b)*** *highly biodiverse forest and other wooded land which is species-rich and not degraded, or has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes;*	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management

	System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Article 29 (3c): Protection of land with high biodiversity value	
Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: *(c) areas designated:* *(i) by law or by the relevant competent authority for nature protection purposes; or* *(ii) for the protection of rare, threatened or endangered ecosystems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature, subject to their recognition in accordance with the first subparagraph of Article 30(4), unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.* ***(i)***	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: □ Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 □ Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, □ Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside

Article 29 (3d): Protection of land with high biodiversity value	
Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: *(c) highly biodiverse grassland spanning more than one hectare that is:* *(i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or* *(ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.*	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Article 29 (3e): Protection of land with high biodiversity value
Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:(e) heathland – Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum

etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Article 29 (4a): Protection of land with high carbon stock	
Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: *(a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year;* *This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.*	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. •

	Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Article 29 (4b): Protection of land with high carbon stock	
Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: *(b) continuously forested areas, namely land spanning more than one hectare with trees higher than five metres and a canopy cover of more than 30 %, or trees able to reach those thresholds in situ;* *This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.*	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Article 29 (4c): Protection of land with high carbon stock
Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

(c) land spanning more than one hectare with trees higher than five metres and a canopy cover of between 10 % and 30 %, or trees able to reach those thresholds in situ, unless evidence is provided that the carbon stock of the area before and after conversion is such that, when the methodology laid down in Part C of Annex V is applied, the conditions laid down in paragraph 10 of this Article would be fulfilled. *This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.*

Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Article 29 (5): Protection of peatland
Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.

Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. •

	Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Country: United Kingdom - 0.12

Article 29 (2): Soil quality and soil carbon	
Biomass fuels produced from waste and residues derived not from forestry but from agricultural land shall be taken into account for the purposes referred to in points (a), (b) and (c) of the first subparagraph of paragraph 1 only where operators or national authorities have monitoring or management plans in place in order to address the impacts on soil quality and soil carbon. Information about how those impacts are monitored and managed shall be reported pursuant to Article 30(3).	
(i) Impacts on soil quality	
Step 1: Identification of applicable laws	
Have the applicable law(s) been identified?	Yes
List of applicable law(s)	S.R. 2025 No. 165 Act 2011,2019, S.R. 2019 No. 81
Sources	Legislation / control Soil-management implications Nutrient Action Programme Regulations (Northern Ireland) 2019, S.R. 2019 No. 81, as amended Applies to agricultural land across Northern Ireland. Covers fertiliser application, nitrogen and phosphorus management, digestate, storage, winter cover, crop management and records. Match inputs to crop needs and soil evidence; energy use is not an automatic exemption. DAERA programme guidance; Regulatory provisions. Farm Sustainability Standards Regulations (Northern Ireland) 2025, S.R. 2025 No. 165, as amended Support-related requirements include FSS4 (soils), FSS1 (water) and FSS2 (habitats/biodiversity). Inspections and non-compliance can affect covered payments. Obtain the current underpinning requirements; do not substitute Republic of Ireland GAEC conditions. DAERA: standards and inspections. In Northern Ireland, hedge cutting is regulated under DAERA Cross-Compliance rules and the Wildlife and Natural Environment (NI) Act 2011 to protect nesting birds and biodiversity.
Step 2: Description of enforcement and monitoring by competent authorities	
Description of the practical implementation and monitoring of the	The reviews and ongoing audit of the Supply Chain showed that Operations related to feedstock sourcing and biomass production had a strong level of compliance with applicable laws and regulations. Whilst it was identified some plantations were in place on peat based soils there was no evidence of these being drained or developed since 2008 with any sites were peat was evident

law(s)	it was clear these had been in grassland or other crops (Wheat/Barley) prior to planting of the SRC Willow Landowner declaration confirming ownership or legal harvesting rights. Supplier audit reports, corrective-action records and annual supplier-review results. Harvest records identifying field, date, contractor, volume and destination. Delivery dockets and weighbridge records linking each load to an approved willow plot Department of Agriculture Willow Planting Best Practice Guidelines Mass-balance reconciliation linking harvested tonnes, delivered tonnes and SBP-controlled quantities.
Sources	Legislation / control Soil-management implications Nutrient Action Programme Regulations (Northern Ireland) 2019, S.R. 2019 No. 81, as amended Applies to agricultural land across Northern Ireland. Covers fertiliser application, nitrogen and phosphorus management, digestate, storage, winter cover, crop management and records. Match inputs to crop needs and soil evidence; energy use is not an automatic exemption. DAERA programme guidance; Regulatory provisions. Farm Sustainability Standards Regulations (Northern Ireland) 2025, S.R. 2025 No. 165, as amended Support-related requirements include FSS4 (soils), FSS1 (water) and FSS2 (habitats/biodiversity). Inspections and non-compliance can affect covered payments. Obtain the current underpinning requirements; do not substitute Republic of Ireland GAEC conditions. DAERA: standards and inspections.
Is the enforcement and monitoring ensured for the identified law(s)?	Yes
Step 3: Evaluation of the effectiveness of the legal framework	
Evaluation of the practical implementation of the law(s) and explanation for the evaluation	Legislation / control Soil-management implications Nutrient Action Programme Regulations (Northern Ireland) 2019, S.R. 2019 No. 81, as amended Applies to agricultural land across Northern Ireland. Covers fertiliser application, nitrogen and phosphorus management, digestate, storage, winter cover, crop management and records. Match inputs to crop needs and soil evidence; energy use is not an automatic exemption. DAERA programme guidance; Regulatory provisions. Farm Sustainability Standards Regulations (Northern Ireland) 2025, S.R. 2025 No. 165, as amended Support-related requirements include FSS4 (soils), FSS1 (water) and FSS2 (habitats/biodiversity). Inspections and non-compliance can affect covered payments. Obtain the current underpinning requirements; do not substitute Republic of Ireland GAEC conditions. DAERA: standards and inspections.
Sources	Legislation / control Soil-management implications Nutrient Action Programme Regulations (Northern Ireland) 2019, S.R. 2019 No. 81, as amended Applies to agricultural land across Northern Ireland. Covers fertiliser application, nitrogen and phosphorus management, digestate, storage, winter cover, crop management and records. Match inputs to crop needs and soil evidence; energy use is not an automatic exemption. DAERA programme guidance; Regulatory provisions. Farm Sustainability Standards Regulations (Northern Ireland) 2025, S.R. 2025 No. 165, as amended Support-related requirements include FSS4 (soils), FSS1 (water) and FSS2 (habitats/biodiversity). Inspections and non-compliance can affect covered payments. Obtain the current underpinning requirements; do not substitute Republic of Ireland GAEC conditions. DAERA: standards and inspections.
Is legal framework effective?	Yes
Step 4: Detailed description of a management plan and monitoring at economic operator level	As part of the supplier audit and subsequent TOF checklist completion, the economic operator should be able to illustrate: The maintenance of the soil's productive and ecological functions throughout establishment, crop growth, harvesting and eventual crop removal. Monitor chemical fertility, physical structure, water movement, organic matter and biological condition together. Repeated physical examination and chemical testing as complementary approaches to assessing soil health. soil-health physical examination. • Prevent avoidable erosion, compaction, rutting and pollution. • Maintain crop-appropriate pH and balanced nutrition within legal

	application allowances. • Detect deterioration early using repeatable measurements against a documented baseline. • Protect carbon-rich soils and sensitive habitats; do not assume that energy-crop production automatically improves soil carbon. • Demonstrate what was checked, what was found, what action followed and whether that action worked. Indicator When to monitor Responsibility and interpretation Fertility: pH, P and K Baseline; proposed repeat every 3 years, sooner after a material problem or on adviser instruction. Never exceed the applicable legal validity period. Soil-management lead and laboratory; compare with crop-specific targets and legal nutrient allowances. Update the nutrient plan before applications. The Nutrient Action Programme Regulations (Northern Ireland) 2019 describes a 4-year validity period for nutrient tests, distinct from this proposed shorter management cycle. Sampling guidance. Organic matter / organic carbon Baseline; proposed repeat every 3–5 years using a consistent protocol, and review after major land-use change. Adviser and laboratory; investigate persistent decline after allowing for variability. Do not interpret one small change as a proven trend or carbon-stock change. Structure, roots and compaction Baseline; annually at comparable conditions, before harvest and after harvest where damage is suspected.Trained field inspector; compare permanent observation locations, headlands, wheelings and representative crop areas. Use the same visual scoring system and photographs. Soil cover, erosion and runoff Proposed monthly checks during establishment; before/after major operations and after severe rainfall when safe. Field operator; record bare patches, rills, sediment movement, buffer condition and standing water. Investigate new problems rather than waiting for the annual review. Trafficability and harvest damage Before every machinery operation; reassess when weather or field conditions change; post-operation inspection. Operator and manager; record go/no-go decision, field moisture, route and machinery. Stop and reassess if rutting, smearing or structural damage develops.
(ii) Impact on soil carbon	
Step 1: Identification of applicable laws	
Have the applicable law(s) been identified?	Yes
List of applicable law(s)	Environmental Impact Assessment (Agriculture) Regulations (Northern Ireland) 2007 — S.R. 2007 No. 421, as amended
Sources	These regulations address relevant uncultivated-land, semi-natural-area and rural restructuring projects. DAERA advises that proposed alterations to the use or management of uncultivated or semi-natural land must be referred for prior approval; proposals likely to have significant environmental effects require environmental assessment before a decision
Step 2: Description of enforcement and monitoring by competent authorities	
Description of the practical implementation and monitoring of the law(s)	Implementation: Obtain the applicable screening decision and, where required, consent before clearance, cultivation, drainage or conversion. Retain the decision, approved maps and operating conditions.daera-ni Enforcement: DAERA can issue stop and reinstatement notices. Unauthorised works and failure to comply with notices can lead to prosecution and reinstatement costs.daera-ni B. Protection of soils through agricultural support Farm Sustainability Standards Regulations (Northern Ireland) 2025 — S.R. 2025 No. 165, as amended FSS applies to beneficiaries of the listed agricultural and forestry support schemes. Relevant standards include: • FSS1 — Protection of Waters from Pollution •FSS2 — Protection of Habitats and Biodiversity • FSS3 — Protection of Landscape, Archaeological and Heritage Features • FSS4 — Protection of Soils.daera-ni Implementation: Identify whether the supplier claims a covered payment and assess the applicable underpinning requirements. FSS applies throughout the calendar year to the land within the claimant's business, including rented land.daera-ni Monitoring and enforcement: DAERA inspections can involve visual examination of land and examination of records; findings can affect support payments.daera-ni Distinction: Payment conditions are not a substitute for separate statutory permissions. Nor does a satisfactory support-scheme inspection

	establish that soil-carbon stocks have increased.
Sources	To ensure protection of the environment, Farm Sustainability Standards Regulations (Northern Ireland) 2025 — S.R. 2025 No. 165, as amended
Is enforcement and monitoring ensured for the identified law(s)?	Yes
Step 3: Evaluation of the effectiveness of the legal framework	
Evaluation of the practical implementation of the law and explanation for the evaluation	The Management System for review of same For Areas of Special Scientific Interest (ASSIs), owners and occupiers must obtain NIEA consent for listed notifiable operations. Carrying out such operations without written consent is an offence; consent can include conditions protecting the designated features.daera-ni Implementation: Check site designations, the relevant ASSI operations list and potential effects on protected sites before approving planting, drainage or harvesting. An agricultural approval should not be assumed to resolve every conservation requirement.
Sources	Legislation / control Soil-management implications Nutrient Action Programme Regulations (Northern Ireland) 2019, S.R. 2019 No. 81, as amended Applies to agricultural land across Northern Ireland. Covers fertiliser application, nitrogen and phosphorus management, digestate, storage, winter cover, crop management and records. Match inputs to crop needs and soil evidence; energy use is not an automatic exemption. DAERA programme guidance; Regulatory provisions. Farm Sustainability Standards Regulations (Northern Ireland) 2025, S.R. 2025 No. 165, as amended Support-related requirements include FSS4 (soils), FSS1 (water) and FSS2 (habitats/biodiversity). Inspections and non-compliance can affect covered payments. Obtain the current underpinning requirements; do not substitute Republic of Ireland GAEC conditions. DAERA: standards and inspections.
Is legal framework effective?	Yes
Step 4: Detailed description of a management plan and monitoring applied at economic operator level	The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Management stage Controls to implement Evidence to retain Site Assessment Identify each plot; record previous land use, mineral/organic soil, peat depth where relevant, drains, watercourses and designations. Plot maps, soil information, historical imagery, site photographs and landowner declaration. Risk Assessment & Mitigation Separately assess land-use-change, peat, drainage, erosion, compaction and nutrient risks. Refer uncertain or high-risk plots for specialist review. Signed risk assessment, specialist findings and mitigation plan. Legal Approval Maintain a plot-level legal register. Do not authorise relevant works until required decisions and consents are documented. Screening decisions, permissions, consents, conditions and regulator correspondence. Operational Controls Issue contractor instructions covering approved work areas, drainage restrictions, ground conditions, buffers and incident response. Work instructions, contractor briefings, cultivation and drainage logs, nutrient records and harvest records. Monitoring & Reporting Inspect before establishment, after material drainage/cultivation works, and following harvest. Commission a specialist-designed soil-carbon monitoring programme where carbon outcomes are claimed. Inspection reports, repeat photographs, laboratory results, sampling locations and corrective actions.

Article 29 (3a): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: *(d) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located.* *;*	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Article 29 (3b): Protection of land with high biodiversity value	
Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: ***(e)*** *highly biodiverse forest and other wooded land which is species-rich and not degraded, or has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes;*	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the

	Minister for Environment, Heritage and Local Government, 8 □ Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, □ Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Article 29 (3c): Protection of land with high biodiversity value	
Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: *(c) areas designated:* *(i) by law or by the relevant competent authority for nature protection purposes; or* *(ii) for the protection of rare, threatened or endangered ecosystems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature, subject to their recognition in accordance with the first subparagraph of Article 30(4), unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.* ***(ii)***	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: □ Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 □ Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, □ Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and

	ensure compliance • Actions: 6. Training & Engagement • Objective: Build

Article 29 (3d): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

(f) highly biodiverse grassland spanning more than one hectare that is:

(iii) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or

(iv) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.

Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Article 29 (3e): Protection of land with high biodiversity value

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:(e) heathland – Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Article 29 (4a): Protection of land with high carbon stock	
Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: *(d) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year;* *This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.*	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive

	2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Article 29 (4b): Protection of land with high carbon stock	
Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: *(e) continuously forested areas, namely land spanning more than one hectare with trees higher than five metres and a canopy cover of more than 30 %, or trees able to reach those thresholds in situ;* *This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.*	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Article 29 (4c): Protection of land with high carbon stock

Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status: *(f) land spanning more than one hectare with trees higher than five metres and a canopy cover of between 10 % and 30 %, or trees able to reach those thresholds in situ, unless evidence is provided that the carbon stock of the area before and after conversion is such that, when the methodology laid down in Part C of Annex V is applied, the conditions laid down in paragraph 10 of this Article would be fulfilled.* *This paragraph shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008.*	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Article 29 (5): Protection of peatland	
Biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.	
Description of a management system process to meet the requirement.	Agricultural Biomass is Supplied to Edenderry Power in the form of Willow Chips derived from Short Rotation Coppiced Willow Plantations - As part of review of these supply chains which were planted under the 2015 Bio Energy Establishment Scheme - To ensure protection of the environment, applicants: (i.) Must adhere to all provisions of S.I. No. 31 of 2014, European Communities, (Good Agricultural Practice for Protection of Waters) Regulations 2010. (ii.) Must obtain approval from the Department in consultation with the National Parks and Wildlife Service to plant in the following protected areas: Natural Heritage Areas (NHAs) proposed or designated by the Minister for Environment, Heritage and Local Government, 8 Farmland-based Special Areas of Conservation (SACs) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats, Special Protection Areas (SPAs) designated under Council Directive 2009/147/EC on the Protection of Wild Birds The Management System for review of same in line with Primary Feedstock Checklist is outlined below. Site Assessment • Objective: Identify and

	classify areas of high biodiversity value. • Actions: Risk Assessment & Mitigation • Objective: Evaluate threats to biodiversity and implement controls. • Actions: Operational Controls • Objective: Ensure day-to-day activities support biodiversity goals. • Actions: Monitoring & Reporting • Objective: Track biodiversity outcomes and ensure compliance. • Actions: 6. Training & Engagement • Objective: Build awareness and capacity among stakeholders. • Actions: 7. Review & Continuous Improvement • Objective: Adapt and improve the system based on feedback and new data. • Actions: This Supply Base Evaluation (SBE) risk register supports the assessment of SBP Standard 1 indicators for primary feedstock from Trees Outside Forests (TOF) within an Irish biomass supply base. It is intended for use where woody biomass is sourced from non-forest origins including short rotation coppice willow, energy crops, hedgerows, field boundary trees, agricultural holdings, orchards, agroforestry systems and other trees on agricultural land.

Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For "Trees outside forests (TOF) – Urban and landscape feedstock" no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For "Trees outside forests (TOF) – Agricultural land feedstock" the applicable criteria are Article 29 paragraphs (2)-(5).