

Biomass Feedstock Accounting v1.3 Module

Public Consultation Summary

Published on 16 October 2025

Context

Isometric held a public consultation on its Biomass Feedstock Accounting v1.3 Module to receive stakeholder input on this Module.

The public consultation was announced on the 25th of July, 2025. The period of consultation lasted 30 days, with the final day as the 25th of August 2025.

After the initial public consultation, the feedback received was considered for incorporation into the Module. All stakeholders have received responses to the submitted feedback. This document summarizes the feedback received during the public consultation and the revisions included as a result of the comments.

We thank all participants for their time.

Summary of feedback received

Section	Comment	Resolution
Overall Clarity	The majority of comments were regarding clarity. Given the large restructuring and rewording of the module between v1.2 and v1.3.	[Changed]: We have addressed every comment, improving the clarity of this module.
Forestry Certification	Comments from partners, buyers and suppliers highlighted that the need for certification programs truncates a large amount of forestry biomass available for use by Project Proponents.	[Changed]: In consultation with our partners, we have suggested an alternative path to establish sustainable forestry biomass sourcing. This includes a risk assessment that fundamentally addresses the same criteria as a certification program while allowing Project Proponents to source from uncertified regions/forests.
Scope of Feedstocks	Comments suggested the definition of eligible residues to be used within the municipal waste category.	[Changed]: We have added a footnote as suggested feedstocks to meet this criteria, other feedstocks may be considered on a case-by-case basis.
Retrofits	Comments questioned the applicability of the retrofit-specific criteria to edge cases outside of the scope of CCS.	[Changed]: We have expanded the scope of these criteria while clarifying our definition of retrofits and accounting for parasitic load.
Counterfactual Storage	Comments highlighted that counterfactual storage is a new concept to many suppliers and buyers and requested increased guidance.	[Changed]: We have increased guidance around the calculation of counterfactual storage, including a more explicit passage on why it is necessary and how it is assessed. Example calculations have been provided in an appendix. Isometric endeavors to provide more guidance in upcoming workstreams.
MRV	Comments suggested clear guidelines for data collection, reporting and auditing.	[Changed]: We have included some guidance where applicable for suggestions/requirements of data. A lot of these documentation requirements are left open due to different data availability in different jurisdictions.

Non-Marketable Residues	Comments highlighted the difficulties in distinguishing between economic and environmental benefits of a residue.	[Changed]: We have now grouped these definitions and defined them in a footnote.
Market Leakage	Comments highlighted some confusion regarding the terms “Maximum Biogenic Carbon Utilization Rate” and “Baseline Emission Rate”	[Changed]: We have now included more detail within both the relevant criteria and the baseline appendix to be more descriptive of what these terms define and how they are used by a Project Proponent
Market Leakage	Comments suggested that our current demand for upfront revenue contribution analysis of payments made to feedstock suppliers are often unavailable to the Project.	[Changed]: While we have kept this criteria, we have defined other approaches that may be used by a Project Proponent. These are more conservative in scope but often more accessible by a Project Proponent. These have been put in place to ensure payments made to upstream feedstock suppliers to not incentivise the production of more residues.