



Green Gold Label

Summary of results from
November 2025 stakeholder consultation

13 March 2026

Executive summary

- After more than 1 year of preparations, GGL published 20 new documents on **7 November 2025 (Publication date)** that make the GGL scheme modular, harmonise document structure and include several updates.
- The most significant changes include:
 - Introduction of GGL Scopes to support different GGL Modules
 - Allocation criteria of raw material to GGL Categories of biomass
 - Adjustment of Participant fees
 - Harmonisation of Document structure, Glossaries, Change logs and Transitioning schedules
- During November 2025–February 2026 a total number of 117 feedback items were received:
 - 75% of the 117 items related to GGL Setup and Governance documents and the GGL Standards,
 - Most items suggested Technical content changes (38%), changes in Evidencing and justification requirements (27%) or changes to the Document structure (18%)
- GGL has evaluated all feedback items in detail and accepted the majority of these (62%). Some suggested changes were not accepted (28%), while a minority remains unclear after requests for clarification (9%).
- The new GGL Documentation has been adopted as of **2 March 2026 (Adoption date)**. Old versions of the documentation will continue to be valid until the Effective date of 1 March 2027, after which certification decisions against these old versions will lose their validity on 1 March 2028 (End of Transitioning period).

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- **November-2025 Stakeholder consultation**

- Major changes in GGL Documentation
- Stakeholder consultation input received
- GGL review process and outcomes
- Next steps

Stakeholder consultation: from 7 November 2025 through 2 March 2025



1. Finalize discussions with regulators

2. Prepare draft documentation and summarize changes

[Publication date: 7 November 2025]

3. Bring new changed documentation into force

[Adoption date: 2 March 2026]

4. Take old documentation out of scheme

[Effective date + Start of transition period: 2 March 2027]

5. End validity of certifications and audits under old scheme

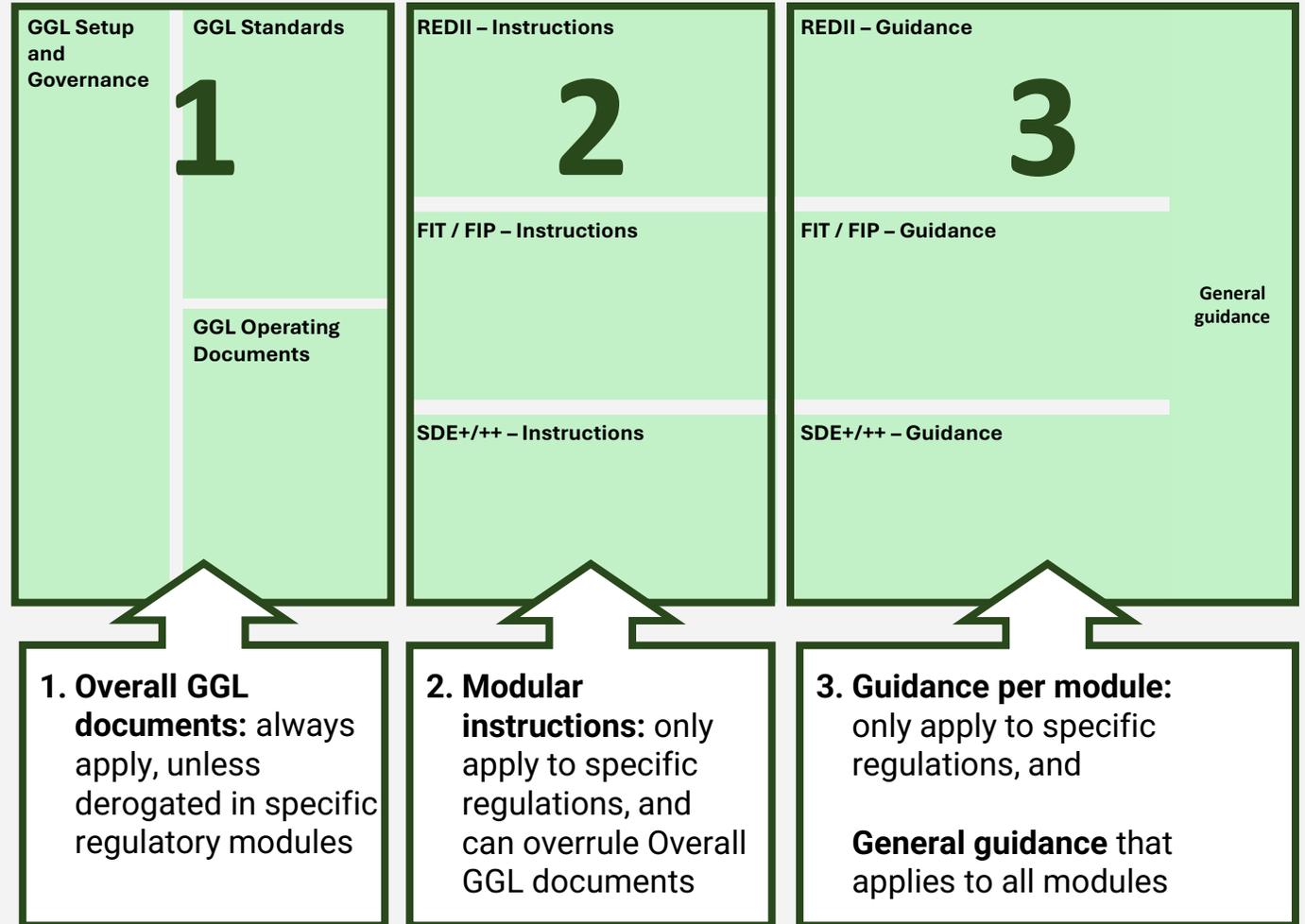
[End of transition period: 2 March 2028]

- Stakeholder Consultation – feedback from November 2025 through February 2026

New GGL Documentation with Modules

In general:

- The GGL scheme integrates multiple regulations
- GGL Documentation is structured in 3 types of documents:
 1. Overall GGL documents:
 - Setup and governance
 - Standards
 - Operating documents
 2. Modular Instructions
 3. Guidances



GGL Documentation of 40+ documents..



<p>GGL Setup and Governance</p> <ul style="list-style-type: none"> Articles of association GGL foundation GGL Document structure GGL Regulation GGL Scope definitions GGL CB agreements GGL Partner Code of Conduct GGL Operating Agreement 	<p>GGL Standards</p> <ul style="list-style-type: none"> GGLS1 – Chain of custody criteria GGLS2 – Agricultural source criteria GGLS4 – Transaction and Product Certificate GGLS5 – Forest management criteria GGLS6 – Power company criteria 	<p>RED – Instructions</p> <ul style="list-style-type: none"> Instruction A.0 – RED Module Instruction A.1 – RED Reporting duties Instruction A.2 – RED Internal monitoring Instruction A.3 – RED Auditor requirements Instruction A.4 – RED GHG emissions Instruction A.5 – RED Additional Agricultural source and Forest management criteria Instruction A.6 – RED Additional Biogenic residues and waste criteria 	<p>RED – Guidances</p> <ul style="list-style-type: none"> Guidance A.0.i – RED Raw materials statement template Guidance A.0.ii – RED Transaction certificate template Guidance A.0.iii – RED Audit template Guidance A.4.iv – RED GHG default values Guidance A.5.v – RED Level A Risk assessments Guidance A.6.vi – RED Supplier verification checklist for biogenic residues and waste 	<p>GHG Guidance</p> <ul style="list-style-type: none"> Guidance ABC.1 – GHG calculator
<p>GGL Operating documents</p> <ul style="list-style-type: none"> GGL Participant fees GGL Logo and tradename use GGL List of prohibited materials 	<p>FIT / FIP – Instructions</p> <ul style="list-style-type: none"> Instruction B.0 – FIT/FIP Module Instruction B.1 – FIT/FIP Endorsed schemes Instruction B.2 – FIT/FIP GHG emissions Instruction B.3 – FIT/FIP Additional power company criteria 	<p>FIT / FIP – Guidances</p> <ul style="list-style-type: none"> Guidance B.0.i – FIT/FIP Raw materials statement template Guidance B.0.ii – FIT/FIP Transaction certificate template Guidance B.0.iii – FIT/FIP Audit template Guidance B.0.iv – FIT/FIP Supplier verification checklist for biogenic residues and waste Guidance B.2.v – FIT/FIP LCGHG default values 		
<p>SDE++ – Instructions</p> <ul style="list-style-type: none"> Instruction C.1 – SDE++ Endorsed schemes Instruction C.2 – SDE++ GHG emissions 	<p>SDE++ – Guidances</p> <ul style="list-style-type: none"> Guidance C.0.i – SDE++ Raw materials statement template Guidance C.0.ii – SDE++ Transaction certificate template 			

...of which 20 Adopted on 2 March 2026



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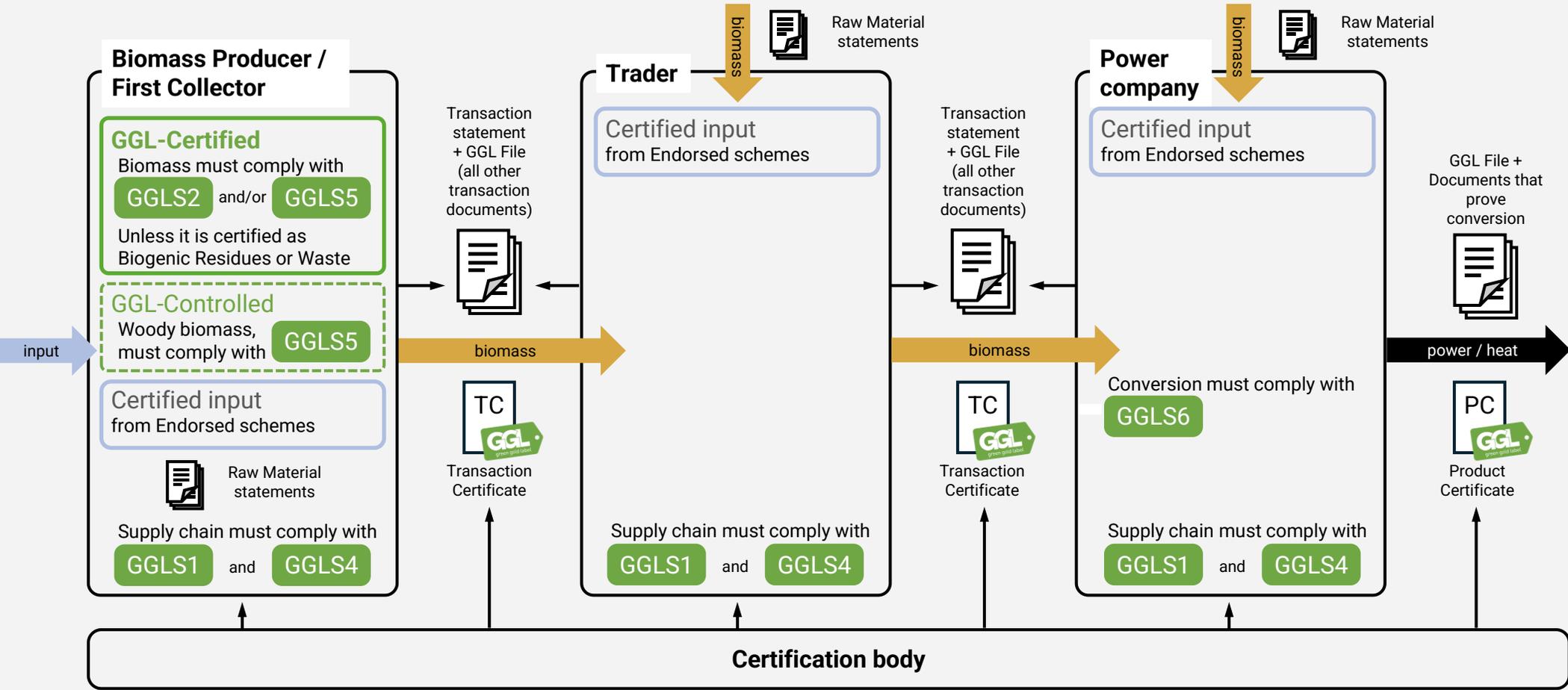
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Not new: which GGL Standards apply



New: GGL Scopes make Modules work together with GGL Standards

- 1 All GGL Participants and GGL Biomass shall, at all times, comply with the following GGL Standards:
 - GGLS1
 - GGLS4

- 2 For each specific regulation (e.g., RED, FIT/FIP) a GGL module with additional documents apply to all GGL Participants and GGL Biomass

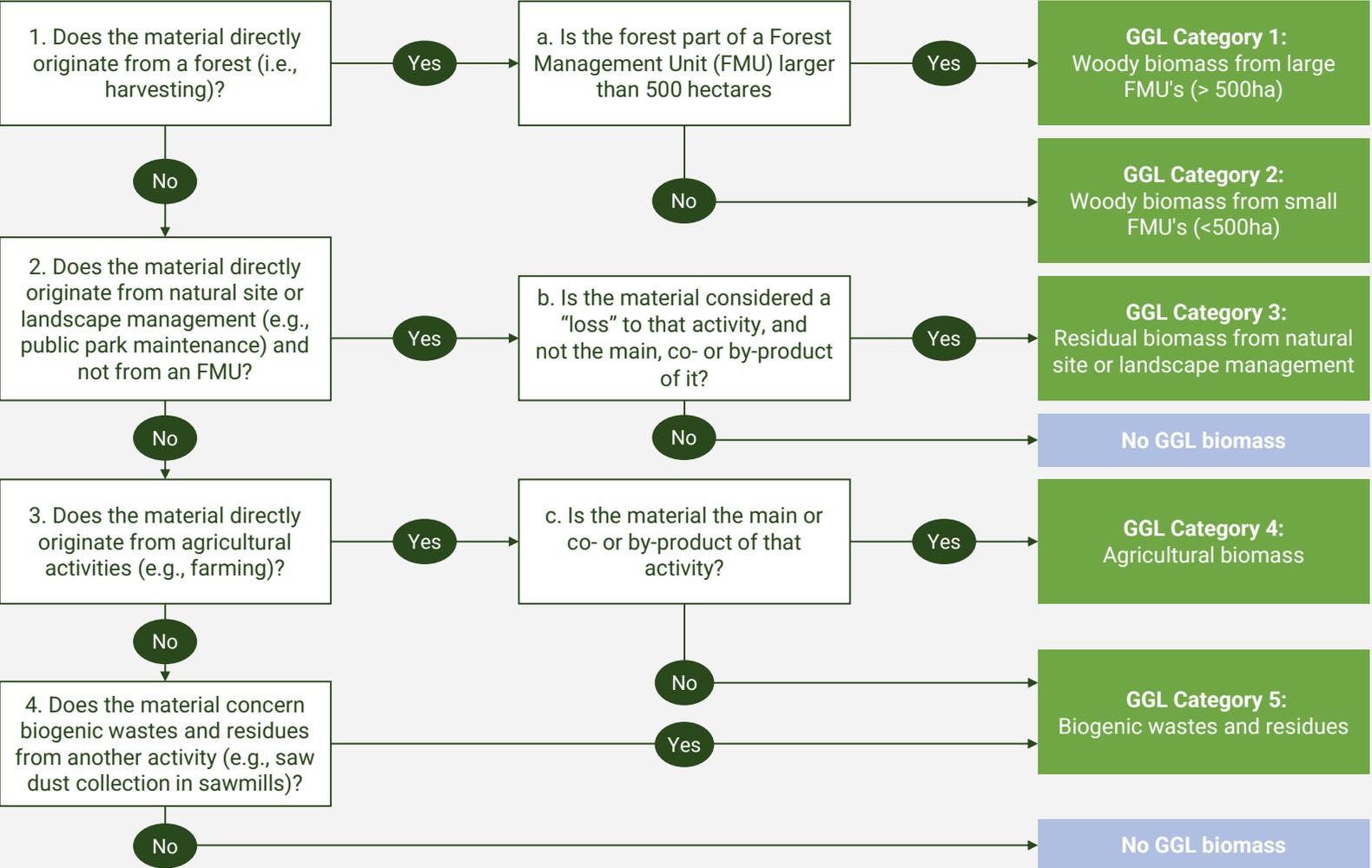
- 3 Depending on the GGL Category of biomass and the type of GGL Participant, the following additional GGL Standards apply:

	GGL Category 1: Woody biomass from large FMU's (>500ha)	GGL Category 2: Woody biomass from small FMU's (<500ha)	GGL Category 3: Woody biomass from nature or landscape management	GGL Category 4: Agricultural biomass	GGL Category 5: Biogenic wastes and residues
Biomass Producer / First Collector	<u>GGLS5</u>	<u>GGLS5</u>	<u>GGLS5</u>	<u>GGLS2</u>	-
Trader	-	-	-	-	-
End-user	<u>GGLS6</u>	<u>GGLS6</u>	<u>GGLS6</u>	<u>GGLS6</u>	<u>GGLS6</u>

GGL Modules:

- RED: Module A
- FIT/FIP: Module B
- SDE+: Module C

New: allocating biomass to GGL Category 1-5



New: Participant fees valid from 1/1/2026

- No increases, but clarifications of current fee structure.
- For input from Endorsed scheme the Variable fee is due.
- Basis of volumes for calculating Variable and Fixed fees is GGLedger data.
- New rates apply as of **1-January 2026**.

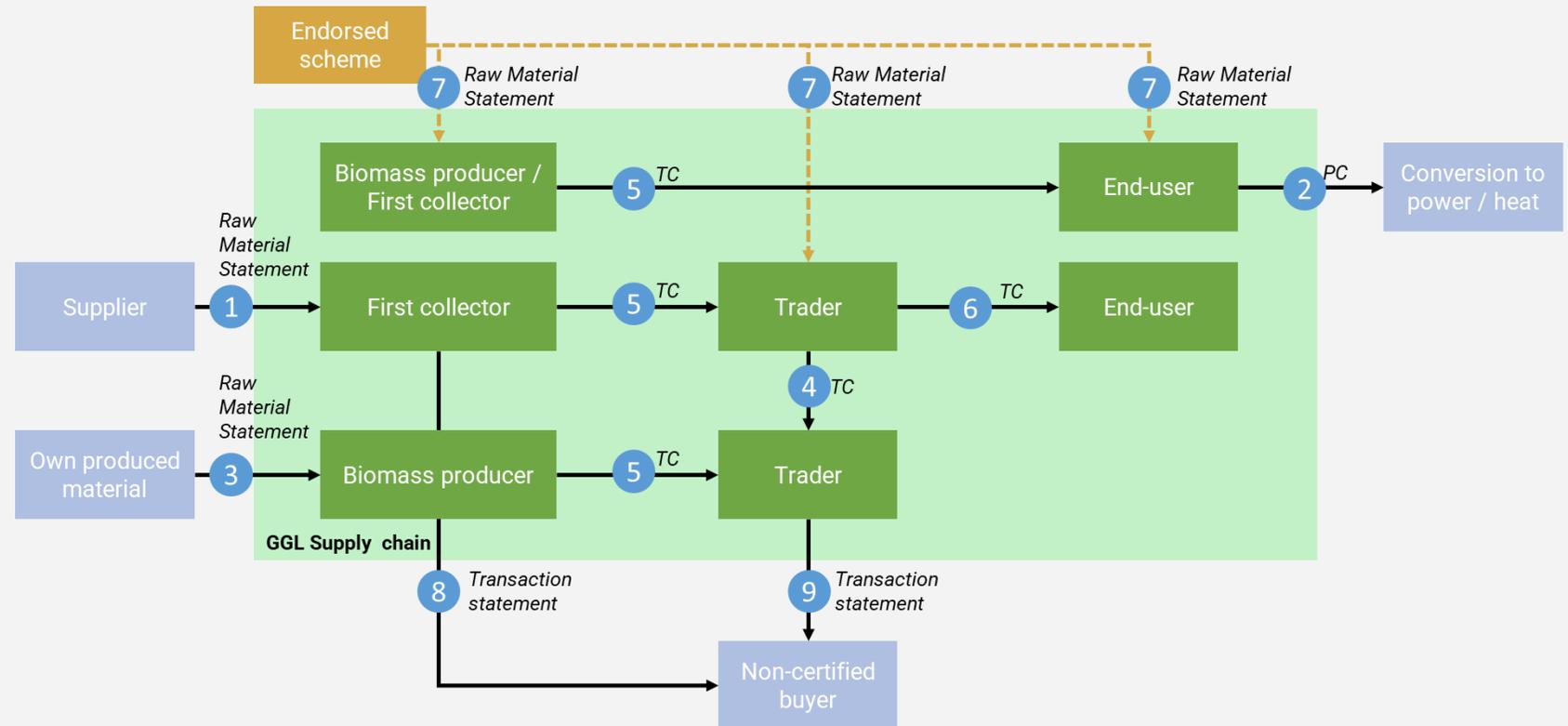


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Consultation process for external stakeholders



7 November 2025	<ul style="list-style-type: none">• Publication date of new GGL documentation	<ul style="list-style-type: none">• GGL website redeveloped for clearer and more accessible document management.• 826 stakeholders invited by email to give input: 300+ existing and 20 prospective Participants, 10 existing and 2 prospective Certification Bodies, 9 NGO's, 4 other certification schemes.
13 November 2025	<ul style="list-style-type: none">• Harmonisation webinar for Certification Bodies	<ul style="list-style-type: none">• Obligatory webinar for all 10 Certification Bodies for a detailed assessment of changes.• Suggestion received to grant 2 extra months of feedback for Adoption by 2 March 2026 (instead of 31 December 2025 as originally planned)
5 February 2026	<ul style="list-style-type: none">• Participant webinar	<ul style="list-style-type: none">• Voluntary webinar for all Participants and stakeholders detailing relevant changes and Q&A.• Attendance of 439 callers during 2 hour webinar in which 30 questions were answered.• Video recording and transcript available on request (info@greengoldlabel.com)
2 March 2026	<ul style="list-style-type: none">• Adoption date of new GGL documentation	<ul style="list-style-type: none">• 117 feedback items reworked into final versions of 20 new GGL documents• Effective date 1 March 2027 and End of Transition period 1 March 2028



117 feedback items received. Majority on GGL Setup & governance and GGL Standards

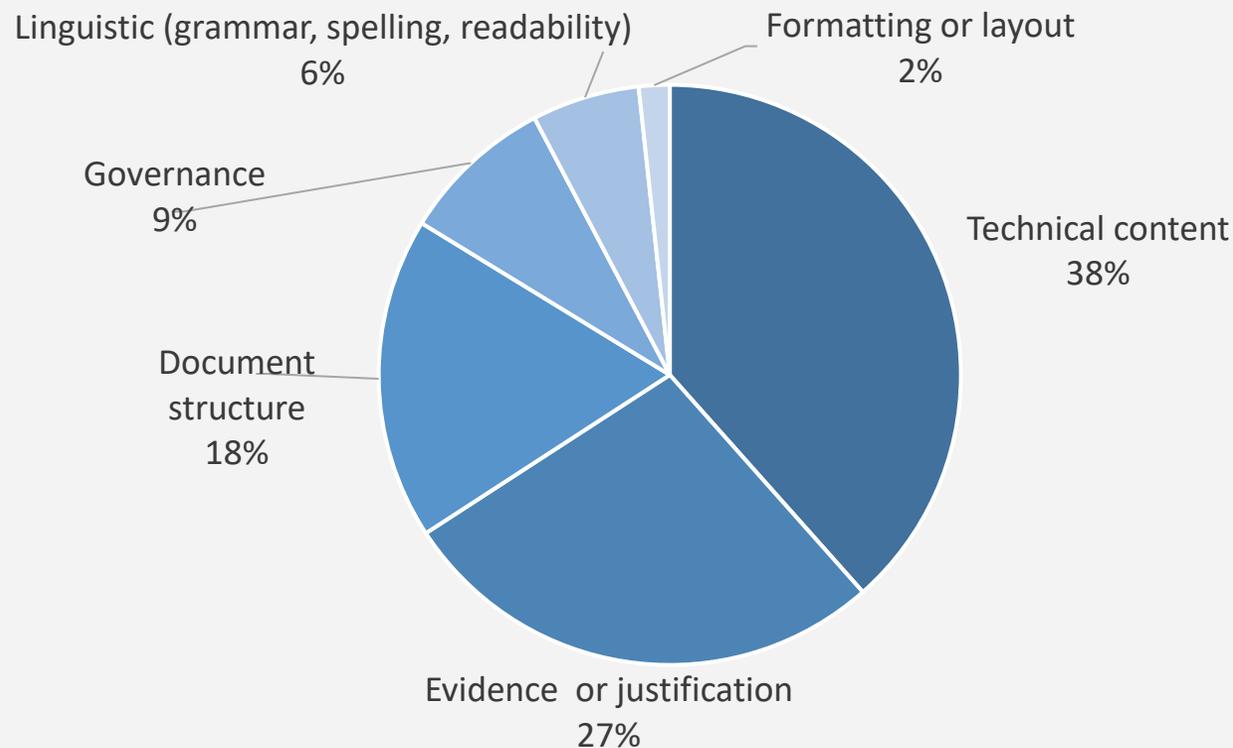
Source of feedback (number of entities)	General	GGL Setup and governance	GGL Standards	GGL Operating documents	FIT/FIP Module
Green Gold Label	9	29	41	1	4
Certification Bodies (4)	1	7		1	2
Participants (4)			7	1	1
Regulators (4)		2	1		6
Consultants (3)		3			1

Internal GGL review:

- Structured drafting and review process with “second pair of eyes”
- Multiple interactions amongst GGL Advisory Council (representing Academia and NGO’s), GGL Board and Programme office
- Duration: 8 months from July 2025 through February 2026
- Most feedback items were incorporated in **Published** documents on 7 November 2025

Most items relate to Technical content and Evidence or justification requirements.

Feedback items per type (100% = 117)

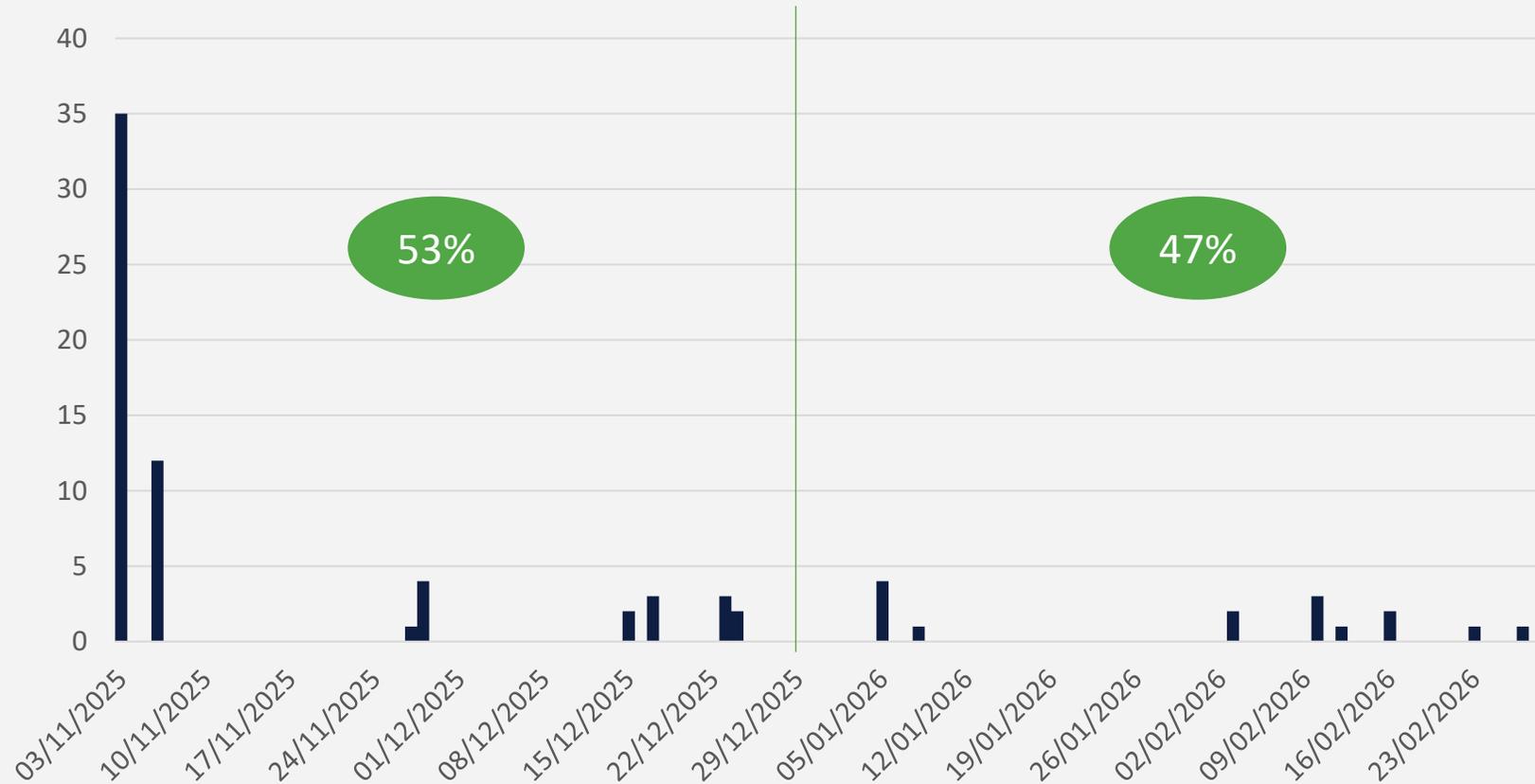


83% of feedback items relate to Technical content, Evidence or justification requirements or Document structure, e.g.:

- Strengthening of sustainability criteria
- Addressing displacement risks and the additionality of biomass
- Adding labour rights requirements
- Strengthening the consequences of non-conformities, including deforestation
- Refining evidencing, justification and sampling requirements

GGL decision to extend consultation period has yielded 47% of feedback items

Dates that 117 feedback items were received



GGL has extended the consultation period, at the request of stakeholders, by 2 months, continuing until 28 February 2026.

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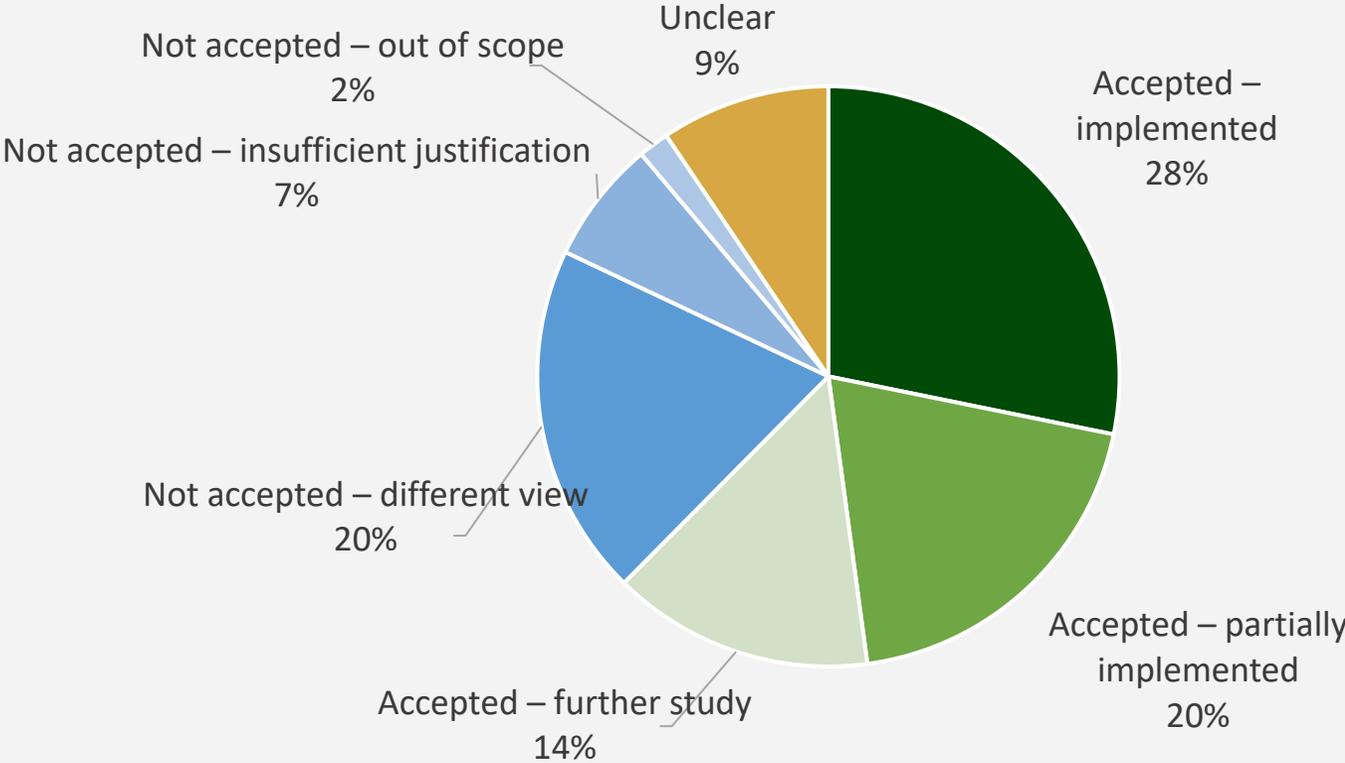
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- **GGL review process and outcomes**

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Most items (62%) are accepted and have resulted in documentation changes.

Feedback items per type (100% = 117)





All feedback evaluated by the GGL Board; over 30% required multiple team discussions.

Resolution and approval process followed	General	GGL Setup and governance	GGL Standards	GGL Operating documents	FIT/FIP Module
Individual review of proposal by all GGL Board members	9	32	27	2	11
Quick GGL Board discussion for joint resolution (~0,5 hour per item)		9	16	1	1
Full GGL Board discussion for joint resolution (1-2 hours per item, with experts as needed)	1		6		2

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Check documentation.greengoldlabel.com



- Newly PUBLISHED documents can be recognised by their status showing a pen icon!



- ADOPTED documents are in force and labelled with a green tickmark



- All documents contain a Change log, for easy referencing to previous versions.
- A document with version v1-0 that has Major changes receives a new version **v2-0**, while a document with only Minor changes receives the new version v1-1.

Changes and transitioning

This section lists the major changes in this version 1-9 from version *GGL-1d. Instruction for supplying Japanese market FIT/FIP v1-0 (March 2024)*

No.	Change type	Section reference	Details of change
1	Content	Glossary	Clarified difference between GGL-Certified and GGL-Controlled biomass
2	Content	A.6	Updated illustrations for GGL Categories' allocation to Japanese FIT/FIP categories
3	Content	D	Removed exception for Traders in Eligible fuels as GGL biomass: these have to be certified at all times
4	Content	D.3	Included specific sampling frequency and sampling size requirements, previously located in <i>GGL Regulation</i> .
5	Content	D.6	Clarified difference between Biomass Producers and First Collectors as certified GGL Participants

To navigate across and interpret all GGL Documentation easily, it is recommended to read the [GGL Document structure](#) first!

Next steps

Thanks to all contributors!



- All input from stakeholders is always welcome
- GGL continues to improve and strengthen its certification scheme
- Contact us at: info@greengoldlabel.com

Annex: 117 stakeholder feedback items as received

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117 feedback items as received (1/21)

Nr	Stakeholder group GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
1	Internal GGL review process	General	<p>Overall, the documents provide a rigorous description and framework of the Green Gold Label. It is specifically clear on offering structure (the division in different documents and modular character that also offers flexibility when standard and policies change), procedures (e.g. the roles of different players) and the governance (e.g. around non-compliance, board structure, etc). From this perspective, the bulk of the edits (in track change) are clear and often improve clarity. Compliments for that.</p> <p>However, it remains puzzling why GGL is positioned exclusively as standard for producers of electricity and heat from biomass. Argumentation for this is missing and it constrains GGL for the future. I would recommend to position GGL in general as a standard to secure the sustainability of biomass resources and supply chain for use as energy carrier or feedstock for chemicals and materials.</p>	Technical content	Accepted – needs further study	Yes	09-Feb
2	Internal GGL review process	General	<p>There are overall many points in the text where reference is made to underlying specifications (annexes, ISO standards, policies, etc.). This leaves the reader often with a sense of vagueness on what is actually secured by the regulations. It would be better to attempt to illustrate the text with what is actually covered by the underlying information to make matters concrete.</p> <p>Connected to this is the very frequent use of words that point to important parts of the regulations and standards (such as: “quality”, “expertise”.....) that come without specification. Although it is usually obvious from the text that these are important qualifications, the lack of specification what is meant or intended (e.g. with quantitative examples) keeps the standard vague. It is recommended to check the texts on where such concrete formulations and values can be included.</p>	Evidence or justification	Not accepted – different view	Yes	09-Feb

117 feedback items as received (2/21)

Nr	Stakeholder group GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
3	Internal GGL review process	General	Very important is that the foundation of the actual sustainability requirements follow directly from policy regulations (such as the RED). So, in terms of what needs to be measured/verified, reported, met (in terms of thresholds) etc., by the parties in the chain and the auditing, those underlying regulations are essential. Furthermore, these regulations can differ per country and see regular updates. This is why the GGL regulations and the organization of the standard has this modular character. I think it is worthwhile, also for communication purposes, to make and keep this very clear. It can also be a very good thing to include such information (much more simple to read, and illustrated with graphics/schemes) on the GGL website. Subsequently, making reference to the underlying sustainability requirements (and summarizing how they result in aspects (parameters, measurements, reporting) that need to be monitored and audited and how such requirements indeed secure that good impacts and performance of the total supply chain and resource is secured.	Evidence or justification	Accepted – needs further study	Yes	09-Feb
4	Internal GGL review process	General	A key content matter for the standards on agricultural biomass as well as forest biomass is the avoidance of displacement, for example indirect land use change (iLUC) and indirect wood use change (iWUC). Displacement implies that using (more) biomass for energy results in vegetation cover lost elsewhere or biomass taken from other markets where they have a (positive) GHG mitigation effect. Avoiding displacement is a core matter and can be done by increasing availability of biomass (new plantings on idle, marginal or degraded lands), increasing productivity) e.g. by improving forest management or agricultural management, by securing that utilized biomass has no other (sometimes very low quality) uses and by monitoring impacts in the market to avoid points are reached that competition with other useful applications is increased significantly. These are typical different dimensions and parameters to monitor and reach well beyond the supply chain only.	Technical content	Accepted – needs further study	Yes	09-Feb

117 feedback items as received (3/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
5	Internal GGL review process	General		<p>A key content matter for the standards on agricultural biomass as well as forest biomass is the avoidance of displacement, for example indirect land use change (iLUC) and indirect wood use change (iWUC). Displacement implies that using (more) biomass for energy results in vegetation cover lost elsewhere or biomass taken from other markets where they have a (positive) GHG mitigation effect. Avoiding displacement is a core matter and can be done by increasing availability of biomass (new plantings on idle, marginal or degraded lands), increasing productivity) e.g. by improving forest management or agricultural management, by securing that utilized biomass has no other (sometimes very low quality) uses and by monitoring impacts in the market to avoid points are reached that competition with other useful applications is increased significantly. These are typical different dimensions and parameters to monitor and reach well beyond the supply chain only.</p> <p>Other standards (on socio-economic side, safety, pollution/emissions) are general about very concrete rules/ regulations and threshold values that need to be safeguarded. This is also true for the very important GHG balance of the value & supply chain.</p> <p>"Use of water and impacts on biodiversity are generally to be monitored and managed on landscape level. This can lead to fairly complex parameters and preconditions that need to be met and monitored.</p> <p>Making those distinctions and what GGL actually secures (referring to the actual applicable sustainability frameworks in the laws and regulations set by governing bodies) has added value I think. Furthermore, it makes much more clear WHAT is to be audited, reported and verified and thus gives the desired specification throughout large components of the documentation."</p>	Evidence or justification	Accepted – needs further study	yes	09-Feb

117 feedback items as received (4/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
6	Internal GGL review process	General	Compliance vs. Impact	<p>Consequence: Overall standard geared to allow compliance with existing legislations (which are required by low) the additionality of the standard in terms of impact remains limited</p> <p>Risk level: No Material risk but limited explored opportunity</p> <p>Recommendation/mitigation: This is a large topic – that would need to define the standard desired vision and mission (and linked strategy). Based on which the next draft of the standard can be more geared towards raising gradually the bar (while securing a market share – also needed for the business and for impact).</p>	Technical content	Accepted – needs further study	Yes	09-Feb
7	Certification Body	General	All	Transition period for Participant certification and CB accreditation updates should end 12 months after Effective date, i.e., 1 March 2028	Technical content	Unclear	Yes	09-Feb
8	Internal GGL review process	General	All	Adoption date to be delayed to 2 March 2026 adding 2 months to documentation updates	Document structure	Not accepted – different view	Yes	09-Feb
9	Internal GGL review process	GGL Guidance B.0.i - FIT FIP - Raw materials statement template v1-4.pdf	Glossary	Post-consumer material: “Material that is reclaimed from a consumer or commercial product that has been used for its intended purpose by individuals, households or by commercial, industrial and institutional facilities in their role as end-users of the product and is not economically nor practically suitable for any further production processes as input material.”. Material reclaimed from consumers aligns with the waste definitions previously outlined in the standards. However, the claim that reclaimed material is neither economically nor practically suitable for use as input in further production processes is incorrect or a contradiction. Such material can, for example, be utilized in the particle board industry or processed into specification-grade fuel. Application and utilization depends on the market conditions, (chemical) composition, and local processing alternatives.	Technical content	Accepted – implemented	Yes	11-Feb
10	Internal GGL review process	GGL Guidance B.0.i - FIT FIP - Raw materials statement template v1-4.pdf	Raw material statement / 3	The material has the following characteristics: Ideally one would state the FMU and applicable FME number, together with the geolocation. Then Legal and Location match.	Document structure	Unclear	Yes	11-Feb

117 feedback items as received (5/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
11	Regulator	GGL Guidance B.0.i - FIT FIP - Raw materials statement template v1-4.pdf	Section 6	Remove reference to post-consumer wood in "When GGL Categories 1, 2 or 3 Woody biomass is concerned this material does not contain any post-consumer material"	Technical content	Accepted – implemented	Yes	11-Feb
12	Internal GGL review process	GGL Guidance B.0.i - FIT FIP - Raw materials statement template v1-4.pdf	Section 1	Implement net amount for RMS, tracing back to gross amount of supply per type of loss gain	Technical content	Accepted – implemented	Yes	11-Feb
13	Regulator	GGL Guidance B.0.iii - FIT FIP - Audit template v1-0.pdf	G.6	Remove reference to post-consumer wood in "GGL Biomass in GGL Categories 1, 2 or 3 shall not contain any post-consumer material"	Technical content	Accepted – implemented	Yes	11-Feb
14	Certification Body	GGL Instruction B.0 - FIT FIP - Module v1-9.pdf	New Principle 4	Supplier verification does not recognize PKS from deforested new plantations. Should be cut-off date for that like MSPO (31 December 2019) and laws in Indonesia (2019)	Technical content	Unclear	Yes	23-Feb
15	Regulator	GGL Instruction B.1 - FIT FIP - Endorsed schemes v2-0.pdf	B.2.1	<p>From our last discussion, our understanding was that for GGL Categories 1, 2, or 3:</p> <ul style="list-style-type: none"> - FSC Mix 100% would be treated as GGL-Certified, and; - FSC Mix<100% as GGL-Controlled. <p>However, in the current version of Instruction B.1 - FIT/FIP Endorsed schemes (p.10, B.2.1), FSC Mix≤100% is treated as GGL-Controlled, which we believe needs be amended.</p>	Document structure	Not accepted – different view	Yes	11-Feb
16	Participant	GGL Instruction B.1 - FIT FIP - Endorsed schemes v2-0.pdf	Transition	<p>We would still like to refer to the GGL-1c Endorsed Schemes v1-6 document, as any changes to this document may affect audit sampling calculations, the addition of audit days, and other related implications.</p> <p>In addition, Palm Oil Mills (PKS) that already hold RSPO certification are considered to have met all the principles applicable under both RSPO and Green Gold Label. Therefore, they object to being categorized as Non-Endorsed, re-verified, and included as audit visit samples in the future.</p>	Technical content	Not accepted – different view	Yes	11-Feb
17	Certification Body	GGL Participant fees v1-4.pdf	Variable fees	Variable fees should not be applicable for wasted raw material, ie., current basis for volumes	Technical content	Not accepted – different view	Yes	09-Jan

117 feedback items as received (6/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
18	Participant	GGL Participant fees v1-4.pdf	Adoption	<p>The participant fee quantity billed should be based to the newly defined adoption date stated in the updated GGL Participant Fee Regulation (V4-1), which is January 1, 2026. For the year 2025, the calculation of the billed quantity for participant fees should still follow the currently applicable regulation (V1-3). We have not received any information or official statement from either the Certification Body or the GGL Foundation indicating that the revised participant fee billing mechanism has been implemented since Q2 2025. The latest GGL document regarding participant fees was only published by the GGL Foundation in November 2025, stating that the adoption date would take effect starting January 1, 2026. Therefore, it is unreasonable to apply this new requirement retroactively to Q2 2025.</p> <p>Additionally, if the participant fee calculation will be based on the stock request quantity going forward, we would like to emphasize that any stock request that is declined by the Certification Body (CB), or approved but later declined during the TC issuance process—resulting in the necessity to resubmit the stock request—should not be billed by the GGL Foundation. This is because the declined stock quantity is ultimately not used in any TC.</p>	Technical content	Not accepted – different view	Yes	09-Jan
19	Internal process	GGL Participant fees v1-4.pdf	Variable fees	Base variable fee on net RMS amount	Technical content	Accepted – implemented	Yes	09-Jan
20	Internal process	GGL Regulation v8-0.pdf	E.1.1	<p>“Under this current version the GGL Scheme can only be used for certified end-use by Power companies producing power and/or heat. Application of GGL biomass in other end-uses takes place outside GGL certification.” An economic operator that is a consumer/final-user of a certified product, is not required to be certified itself under ISCC. Such operator can be a power plant, marine vessel etc. However, European legislation requires such operators to consume certified products. Under these conditions, the integrity of the CoC is maintained up to the non-certified operator. If GGL were to follow this line of reasoning, a potential conflict with E1.2 could arise.</p>	Technical content	Accepted – implemented	Yes	19-Jan

117 feedback items as received (7/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
21	Internal GGL review process	GGL Regulation v8-0.pdf	E.1.2	<p>“An economic operator that is not certified as GGL Participant can buy and receive GGL Biomass and then does so outside the GGL chain of custody upon which the biomass loses any certification status under the GGL Scheme”</p> <p>Suggestion: “An economic operator that is not certified as a GGL Participant is not part of the GGL Chain of Custody (CoC). Consequently, any GGL Biomass received or transferred by such a non-certified operator loses its certification status under the GGL Scheme.”</p>	Document structure	Accepted – implemented	Yes	09-Jan
22	Internal GGL review process	GGL Regulation v8-0.pdf	E.3.1 & 3.2iii	<p>Non-conformity. Suggestion: “In the event that an insurmountable major non-conformity is identified during the audit, the certifying body shall report findings immediately to the Foundation</p>	Linguistic (grammar, spelling, readability)	Accepted – partially implemented	Yes	09-Jan
23	Internal GGL review process	GGL Regulation v8-0.pdf	E.4	Consequences: Immediate suspension.	Technical content	Accepted – partially implemented	Yes	19-Jan
24	Internal GGL review process	GGL Regulation v8-0.pdf	E.5	Termination of certificates. Suggestion: Add “...shall be terminated not later than 6 months after.”	Document structure	Accepted – implemented	Yes	19-Jan
25	Internal GGL review process	GGL Regulation v8-0.pdf	Page 1	Introduction: the “overruling principle” is a very important one. The formulation is a bit awkward (please check again) and I think is best illustrated with a graphic to make (very) clear there are general standards and a merit order with specific (e.g. national ones). In case these national standard are more lenient then the general standards it should be clearly state how GGL certification deals with that.	Document structure	Accepted – implemented	Yes	19-Jan
26	Internal GGL review process	GGL Regulation v8-0.pdf	Section C1	: “transparent and structured way”; one of many examples that does not come with any specification; possibly clear examples (e.g. on the website) can be referred what qualifies as “transparent and structured”.	Evidence or justification	Accepted – partially implemented	Yes	19-Jan

117 feedback items as received (8/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
27	Internal GGL review process	GGL Regulation v8-0.pdf	Section C3	the stakeholder consultation is an important instrument for GGL to secure quality (when changes are implemented); it will be good to clarify somewhere in good detail what this should encompass (and why that is a good way to secure quality). I think it is good to always engage the Advisory Board when such a step is taken.	Governance	Accepted – partially implemented	Yes	19-Jan
28	Internal GGL review process	GGL Regulation v8-0.pdf	Section D3.1	I think advice of the Advisory Board on CONTENT of the standards (KPI's, what is sustainable?, quality of validation, etc) is one of the most crucial activities.	Governance	Accepted – implemented	Yes	19-Jan
29	Internal GGL review process	GGL Regulation v8-0.pdf	Section D3.6	Define “timely and effective” and “specific responsibilities”.	Evidence or justification	Accepted – partially implemented	Yes	19-Jan
30	Internal GGL review process	GGL Regulation v8-0.pdf	Section D3.8	As I understood we strive for a frequency of 4x per year?	Governance	Not accepted – different view	Yes	19-Jan
31	Internal GGL review process	GGL Regulation v8-0.pdf	Section D4	Strategic Advisors: what are the qualifications and areas of expertise that these advisors contribute? How do they relate to the Advisory Board? It can be experienced as a rather arbitrary input in the GGL governance, so specifying further (tasks, content, quality, role, relations) is desirable.	Governance	Accepted – implemented	Yes	19-Jan
32	Internal GGL review process	GGL Regulation v8-0.pdf	Section E1.1	The constraint to “Power companies production power and/or heat” is puzzling; why is this set? Overall, given that GGL certifies biomass supplies and supply chains, the end-use is for less relevant (and easy to change).	Technical content	Not accepted – different view	Yes	19-Jan
33	Internal GGL review process	GGL Regulation v8-0.pdf	Section E.2	GHG; this is of course a core aspect of the certification of GGL; I would elaborate this section by referring to the calculator and the fact that many regulations (Dutch, RED, Japanese (...)) do build on scientifically based GHG calculation methods to determine the net emissions over entire value chains. This is to make clear that GGL checks those methods. You may also want to have limits for GGL that to simple methods (would they be proposed in future markets) with loopholes are not accepted; this can be an important principle for GGL in general: which regulatory frameworks do you want to adhere too (because poor ones could also emerge)...	Evidence or justification	Accepted – implemented	Yes	09-Jan

117 feedback items as received (9/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
34	Internal GGL review process	GGL Regulation v8-0.pdf	Section E3	major and minor are difficult words without further specification.... Good to be more precise on this.	Evidence or justification	Not accepted – different view	Yes	19-Jan
35	Internal GGL review process	GGL Regulation v8-0.pdf	Section E3	The three month period feels uneasy, because it could also be used to get through large volumes of biomass that do not meet certain standards. Would you not want to be more explicit and say that when major non-conformities arise, the GGL certificate is immediately not valid. Validity will be restored at the moment the non-conformity is solved.	Technical content	Accepted – partially implemented	Yes	19-Jan
36	Internal GGL review process	GGL Regulation v8-0.pdf	Section E3.2	define “fundamental failure”; it will be very good to give strong illustrations of this at least.	Evidence or justification	Not accepted – different view	Yes	19-Jan
37	Internal GGL review process	GGL Regulation v8-0.pdf	Section E4	“major consequences” is vague	Evidence or justification	Not accepted – different view	Yes	19-Jan
38	Internal GGL review process	GGL Regulation v8-0.pdf	Section E4.2	the number of “4” seems arbitrary. I would be very careful with this and include safeguards for GGL; at the moment structural problems are discovered, the certificate can be withdrawn. In serious case may be also in retrospect.	Evidence or justification	Not accepted – insufficient justification	Yes	19-Jan
39	Internal GGL review process	GGL Regulation v8-0.pdf	F1.2	“detailed information” as well as “Data request” requires definition; this is a quality assurance, so good to define what is required.	Evidence or justification	Accepted – partially implemented	Yes	18-Feb
40	Internal GGL review process	GGL Regulation v8-0.pdf	F1.3	points to an ISO standard. This is thus an aspect where GGL builds on other quality standards (that may be dynamic over time). Good to explain what this encompasses (and what impacts can be if the ISO standard is updated).	Document structure	Accepted – partially implemented	Yes	19-Jan

117 feedback items as received (10/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
41	Internal process	GGL Regulation v8-0.pdf	F2.1	mentions 5 bullets, but this comes without definition of the content that is requested.	Evidence or justification	Not accepted – insufficient justification	Yes	19-Jan
42	Internal process	GGL Regulation v8-0.pdf	G2	required definition of “insufficient trading experience/history”; how do you qualify / measure this?	Evidence or justification	Accepted – partially implemented	Yes	19-Jan
43	Internal process	GGL Regulation v8-0.pdf	G5a	an auditable system, evidence and documentation is mentioned, but it’s required content is not defined. This is fairly meaningless without definition and specification.	Evidence or justification	Accepted – partially implemented	Yes	19-Jan
44	Internal process	GGL Regulation v8-0.pdf	K3	Training comes without specification on content, quality and examination.	Evidence or justification	Accepted – partially implemented	Yes	19-Jan
45	Internal process	GGL Regulation v8-0.pdf	Annex 1	on training the ISO standard is referred to (good to explain what it covers) and “experience” comes without specification.	Evidence or justification	Accepted – partially implemented	Yes	19-Jan
46	Internal process	GGL Regulation v8-0.pdf	Assurance	Consequence: Fraud/lower level of compliance Risk level: Medium Recommendation/mitigation: Review assurance protocol and audits accreditations & monitor in line with collected expert advice (balancing return and cost/capacity)	Evidence or justification	Accepted – needs further justification study	Yes	19-Jan
47	Internal process	GGLS1 - Chain of custody criteria v4-0.pdf	Glossary	GGL-Controlled: (e.g., EU for REDII, ..) that (instead of ‘to’?) holds the equivalent status.	Linguistic (grammar, spelling, readability)	Accepted – implemented	Yes	20-Jan

117 feedback items as received (11/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
48	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	1.02	"All input material shall be categorised according to their material origin and GHG composition based on the following material categories:" What is a 'GHG' composition? Should it just say 'composition'?	Linguistic (grammar, spelling, readability)	Accepted – implemented	Yes	20-Jan
49	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	Illustration ii	allocation of biomass to GGL Categories / Suggestion: Remove in Q2 "... and not from a FUM". The logic of Q1 dictates that material directly originating from a forest is always from an FMU <>500ha (thus only Category 1 or 2 material). I don't see any conflict with Principle 5. Products entering GGL supply chains.	Document structure	Not accepted – different view	Yes	20-Jan
50	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	B.3	Materials / GGL Regulation. Mention the definition of Material(s) in the glossary: "The scope of the Green Gold Label scheme includes the entire chain of biomass/ biofuel/ bioliquids for energy production and biobased products and biofuel conversion starting at the primary production. It concerns all products, by- or co-products, residues and derivatives of natural origin from agriculture, forestry and/or landscape and environment management that are eligible for the production of energy and biobased products (hereinafter: the "Materials")."	Linguistic (grammar, spelling, readability)	Accepted – needs further study	Yes	20-Jan
51	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	2.13(b)	have evidences that its import- and / or export-activities are validly administered in the Union Database (DB), as soon as the database is operational. Cris: My experience as an economic operator is that the DB is still not operational for bio-liquids.	Technical content	Not accepted – out of scope	Yes	20-Jan
52	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	5.04	Biogenic/recycled wastes and residues (GGL Category 5; see 5.06 below) received with a Raw Material Statement.	Document structure	Accepted – partially implemented	Yes	20-Jan
53	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	Principle 7	Raw material or GGL biomass : Having read the GGL definition and constraints on biomass and 'Waste', I would comfortably argue that the 'EU rules on the shipment of waste' do not apply to GGL. https://environment.ec.europa.eu/topics/waste-and-recycling/waste-shipments_en	Technical content	Not accepted – out of scope	Yes	20-Jan

117 feedback items as received (12/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
54	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	Principle 2	describes a lot of relevant elements, but lacks overall precision; “good quality” and what is tracked and audited could come with more precise formulations. For example 2.08 could be combined in a table where you also give parameters/units of what is to be collected and reported.	Evidence or justification	Not accepted – insufficient justification	Yes	20-Jan
55	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	Principle 2	Also, the modalities of 2.10 are general, while these can be very important in case of non-compliance.	Evidence or justification	Not accepted – insufficient justification	Yes	20-Jan
56	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	5.05	links to the Standard on Forest Biomass; comments, see below.	Document structure	Unclear	Yes	20-Jan
57	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	5.12	is clear in terms of general procedures, but also here, the more general qualifications leave room for interpretation; what is verified? What is an experienced stakeholder? What is adequate reporting? (this could come with a format in an appendix for example).	Evidence or justification	Not accepted – insufficient justification	Yes	20-Jan
58	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	5.12	The 2 months time window to solve a compliance window can be reasonable, but can also give space to “push through” non compliant batches of feedstock. I think this needs to be linked to sanctions in case the non-compliance is serious, such as invalidity of the certificate of a particular batch.	Technical content	Accepted – needs further study	Yes	20-Jan
59	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	Principle 7	has more generic formulations that deserve further specification’	Evidence or justification	Not accepted – insufficient justification	Yes	20-Jan

117 feedback items as received (13/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
60	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	Traceability/origination	<p>Consequence: Biomass used is not RESIDUAL / 'waste' – Negative impact on environment / food security/</p> <p>Risk level: Low for RED/FIT – link to compliance requirement to geolocation. High for agricultural sourcing</p> <p>Recommendation/mitigation: Review potential to align all standard with FIT (Step up) For agricultural sourcing ask for expert advice to lower risk (potentially specific regions or crops where geolocation could be feasible and therefore required).</p>	Technical content	Accepted – needs further study	Yes	20-Jan
61	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	Social/ Labor criteria	<p>Consequence: Current requirements very limited does not allow protection against exploitation</p> <p>Risk level: Low</p> <p>Recommendation/mitigation: The current criteria are already a step forward . More criteria and more specification would need to be incorporated to allow to be effective and more wholistics to cover social risks. This being said, in the current draft already what could be added is a reference to the exact ILO core principle / conventions.</p>	Technical content	Accepted – needs further study	Yes	18-Feb
62	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	General	What are the consequence in terms of auditing (effort/cost) to include compliance to EUDR ? If considerable costs, apply globally or only when applied to EU market?	Technical content	Not accepted – different view	Yes	20-Jan
63	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	Criteria 2.2	unclear – please clarify to board and in the document.	Evidence or justification	Not accepted – different view	Yes	20-Jan

117 feedback items as received (14/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
64	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	Principle 10	Gross and net mass to be included under 10.02 g and 10.03 e and f	Technical content	Accepted – needs further study	Yes	20-Jan
65	Internal GGL review process	GGLS2 - Agricultural source criteria v3-0.pdf	A.1	<p>Agricultural source criteria is based on the United Nations sustainable development program Agenda 21 and the sustainability criteria from the Renewable Energy Directive (2009/28/EC) or later versions / RED III, or Directive (EU) 2023/2413</p> <p>During our last meeting we briefly touched the subject on hierarchical use of biomass. With REDIII in mind I think we should decide to expound more (or not) on hierarchical use for the GGL final product is always used as a fuel for energy production. GGL system does not allow for supply of final product to e.g. the chemical industry. As a result, the GGL system inherently applies a self-imposed filter.</p>	Technical content	Accepted – needs further study	Yes	02-Feb
66	Internal GGL review process	GGLS2 - Agricultural source criteria v3-0.pdf	Principle 1	The agricultural management system is part of an integrated long-term planning program, aimed at development and sustainability.	Linguistic (grammar, spelling, readability)	Unclear	Yes	11-Feb
67	Internal GGL review process	GGLS2 - Agricultural source criteria v3-0.pdf	1.04	The management plan addresses the policy for improving production, harvesting, storage, processing, distribution, and marketing of products at local, national, and regional levels. What do we exactly mean with improving? Would GGL seek to support sustainable development at local, national, and regional levels, in alignment with local standards, customs, and practices?	Technical content	Accepted – needs further study	Yes	02-Feb
68	Internal GGL review process	GGLS2 - Agricultural source criteria v3-0.pdf	1.05	Suggestion / rewrite: The management plan identifies storage and addresses distribution issues that impact food distribution and security.	Linguistic (grammar, spelling, readability)	Accepted – implemented	Yes	11-Feb
69	Internal GGL review process	GGLS2 - Agricultural source criteria v3-0.pdf	C.2	Group manager is an independent legal entity or person. As I read the article, the person may also be a natural person. Would it be advisable to refer to certain requirements regarding KYC, AML, UBO, Company House registration, certificate of good conduct etc?	Technical content	Accepted – partially implemented	Yes	16-Feb

117 feedback items as received (15/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
70	Internal process	GGLS2 - Agricultural source criteria v3-0.pdf	Introduction	starts with referring to “sustainable agriculture & up to date agricultural management” and that is of course fundamental to refer to clear frameworks with standards and criteria what that encompasses. This is a universe in itself and also region and site-specific. The general comments given at the start of this review note apply.	Evidence or justification	Unclear	Yes	11-Feb
71	Internal process	GGLS2 - Agricultural source criteria v3-0.pdf	Principle 2	is probably one of the most fundamental and complex parts that comes with a need for clear methods and parameters. Is this clear for GGL as well as users and auditors? There is an “at least” or formulation... this leaves a lot of room for interpretation. As described, the key matters to consider is avoidance of displacement and the levels of productivity of a given area for biomass production. It is for me not clear what is really in the standard on this (key!) principle.	Evidence or justification	Accepted – needs further study	Yes	11-Feb
72	Internal process	GGLS2 - Agricultural source criteria v3-0.pdf	Principles 3 and 4	Similar questions can be asked about other (very important) principles, especially principle 3 and 4, because this link to landscape level effects (also on the carbon balance). This is an area where a range of co-benefits can also be obtained depending on the overall scheme of biomass production integrated in other land uses. This is interesting, because then the standard is not only about providing safeguards to avoid wrongdoing, but about valuing co-benefits.... Keep in mind that such effects are also relevant for the sustainable availability and possible impacts of the use of agricultural residues (e.g. for nutrient and carbon balances).	Evidence or justification	Accepted – needs further study	Yes	02-Feb
73	Internal process	GGLS2 - Agricultural source criteria v3-0.pdf	General	Remains weak how to address the risk of competing with food storage (cultivation?). Good link to increase productivity, water usage . Can we go so far as to exclude in specific regions of certain food crops (waste)?	Technical content	Accepted – partially implemented	Yes	11-Feb
74	Internal process	GGLS2 - Agricultural source criteria v3-0.pdf	Principle 7	Biodiversity : Need more definition of key terms such as primary forest . Can we include a map with area “ not allowed’ to source?	Evidence or justification	Unclear	Yes	02-Feb
75	Internal process	GGLS2 - Agricultural source criteria v3-0.pdf	1.03	Land tenure – Unclear what is expected (difficulty in smallholder sub-saharian – Africa context)	Technical content	Accepted – partially implemented	Yes	11-Feb

117 feedback items as received (16/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
76	Internal process	GGLS2 - Agricultural source criteria v3-0.pdf	11.01	Point of origins (to monitor plan) – can we specific how this point is verified? GGL Scope definition for Category 4 biomass – space for being more specificity to ensure “no-competition” with food supply.	Evidence or justification	Accepted – needs further study	Yes	02-Feb
77	Internal process	GGLS2 - Agricultural source criteria v3-0.pdf	2.0	Data access from Internal management System is the base for management risks and for auditing – can we specify how to be set and data collection/access	Evidence or justification	Not accepted – different view	Yes	11-Feb
78	Internal process	GGLS2 - Agricultural source criteria v3-0.pdf	1.0	Land ownership: - Valid documents proving ownership, lease, or customary use rights. If formal documents aren’t available (as in many rural areas), the farm/group must show legitimate, uncontested rights recognized by local authorities or communities. - Land must not be under dispute or taken from others without consent. - Expansion of production areas must not cause land conflicts. Example: A cooperative may farm on communal land. If the community recognizes its right to cultivate and no disputes exist, it can still qualify – provided the right is documented in writing.	Evidence or justification	Accepted – partially implemented	Yes	16-Feb
79	Internal process	GGLS4 - Transaction and product certificate v3-0.pdf	A.3	A GGL Transaction Certificate: Suggestion /Add: “Such new (combined) transaction certificate to be produced within ... days.” Whereas I assume that GGLedger can generate a new certificate in a split second.	Governance	Not accepted – different view	Yes	20-Jan
80	Internal process	GGLS4 - Transaction and product certificate v3-0.pdf	A.4	The End-user is (always) a power plant correct?	Technical content	Accepted – implemented	Yes	26-Jan

117 feedback items as received (17/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
81	Internal process	GGLS4 - Transaction and product certificate v3-0.pdf	C.2	“When GGL biomass is sold to a non-certified buyer, the biomass loses its GGL certification at the moment the new buyer takes control of the biomass (physical or not).” I suggest to define ‘control’. Are we talking risk and/or ownership. Biomass can be bought by a non-physical trader, that delivers directly to an end-user that usually pays (in full or not) after quality analysis and final approval.	Linguistic (grammar, spelling, readability)	Accepted – partially implemented	Yes	26-Jan
82	Internal process	GGLS4 - Transaction and product certificate v3-0.pdf	C.4	“Valid certificates of cleanliness of all means of transport and storage from origin to recipient;” Do we allow alternative CBs along the CoC, other than the GGL approved CB, produce and upload certificates of cleanliness into the GGL File? { linked to Principle 1 – 1.04-06}. The same question goes for quality determination by an alternative company at the power plant (Product Certificate).	Evidence or justification	Unclear	Yes	26-Jan
83	Internal process	GGLS4 - Transaction and product certificate v3-0.pdf	D. 1.01(d)	“Shall state the correct calculated total emissions from the use of the fuel (E) as covered under the GGLS1 – Chain of custody criteria;”. Are the total emissions calculated on default at the start of the CoC, or are the total emissions calculated after determining the final NCV? (Linked to C.6: All transaction certificates ... can lead to the issuance of Product Certificates.)	Technical content	Accepted – partially implemented	Yes	26-Jan
84	Internal process	GGLS4 - Transaction and product certificate v3-0.pdf	C.8	Define that multiple scopes on a single TC is possible. But not on a PC.	Governance	Accepted – partially implemented	Yes	20-Jan
85	Internal process	GGLS4 - Transaction and product certificate v3-0.pdf	E.1	Template shall align with GGLedger and FIT/FIP / RED Modules	Governance	Accepted – needs further study	Yes	26-Jan
86	Internal process	GGLS4 - Transaction and product certificate v3-0.pdf	Section 16 and 17	Differentiate amounts into preceding TC, losses / gains and current TC	Technical content	Accepted – implemented	Yes	26-Jan
87	Participant	GGLS4 - Transaction and product certificate v3-0.pdf	Section A.6	How should a *non-certified Transaction Statement* issued under the situation described in Section A.6 be positioned under the GGL scheme? Specifically, we would like to understand whether such a document is considered to provide any form of third-party verification of sustainability and/or legality.	Document structure	Accepted – implemented	Yes	26-Jan

117 feedback items as received (18/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
88	Participant	GGLS6 - Power company criteria v1-3.pdf	Principle 7.07	Periodicity not yet clear: every quarter (3 months) is good. Now text still suggests that should be done by every shipment.	Technical content	Not accepted – different view	Yes	11-Feb
89	Participant	GGLS4 - Transaction and product certificate v3-0.pdf	Annex	Product statement template is missing for Product certificates (but only available for Transaction certificates). Should be optionally available for Participants to clarify inputs to their CB.	Document structure	Not accepted – insufficient justification	Yes	26-Jan
90	Participant	GGLS1 - Chain of custody criteria v4-0.pdf		Could you provide clear criteria for determining Categories 4 and 5? Also, is it correct to understand that suppliers who own plantation CPO Mill tend to fall under Category 4?	Document structure	Not accepted – different view	Yes	20-Jan
91	Participant	GGLS1 - Chain of custody criteria v4-0.pdf		Is it possible that within the same supplier's cargo, some items fall under Category 4 while others fall under Category 5?	Technical content	Unclear	Yes	20-Jan
92	Participant	GGLS4 - Transaction and product certificate v3-0.pdf		Is my understanding correct that for suppliers who cannot submit the required documents within the grace period, the TCs issued during that period will remain valid?	Technical content	Unclear	Yes	26-Jan
93	Participant	GGLS4 - Transaction and product certificate v3-0.pdf		Regarding the GHG emissions value for TRANSPORT, it states that the round-trip distance (return trip) should be taken into account. Does this mean the system will simply calculate using a coefficient of double the distance, or is it necessary to confirm and incorporate the actual return-trip distance?	Technical content	Not accepted – different view	Yes	26-Jan
94	Regulator	GGLS5 - Forest management criteria v2-5.pdf		For “woody biomass”, compliance with GGLS5 (Forest management criteria) is necessary, which means that there should be no land-use change. How is this determined for Group / Regional associations and certified by CB's?	Evidence or justification	Accepted – implemented	Yes	16-Feb
95	Regulator	GGL Instruction B.2 - FIT FIP - GHG Emissions v1-2.pdf	Principle 2	Does this mean that individual data on transport distance etc. is not delivered to the next entity in the supply chain?	Evidence or justification	Not accepted – insufficient justification	Yes	11-Feb

117 feedback items as received (19/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
96	Regulator	GGL Guidance B.0.i - FIT FIP - Raw materials statement template v1-4.pdf	General	Does the RMS transmit all GHG data from supplier to First Collector?	Document structure	Accepted – implemented	Yes	11-Feb
97	Internal GGL review process	GGL Regulation v8-0.pdf	General	Section on auditing is unclear: Initial audit, Surveillance audit and Re-newal audit. General requirement that all Participants are audited every year and that Participant certificates remain valid for 5 years, and Biomass certificates for XX years is missing. It is included in RED and in Regulation v7-6	Document structure	Accepted – implemented	Yes	26-Jan
98	Certification Body	GGL Regulation v8-0.pdf	Glossary	In relation to the definition of suspension on GGL regulation, does suspension also cover cases where the participant is unwilling to undergo a surveillance audit?	Technical content	Not accepted – different view	Yes	02-Feb
99	Certification Body	GGL Regulation v8-0.pdf	E.5	In relation to the terminology, is "terminated" equivalent to "revoked"? Apart from voluntary cancellation while the certificate is still valid, are there any other circumstances that lead to the termination of a certificate?	Document structure	Not accepted – different view	Yes	02-Feb
100	Certification Body	GGL Regulation v8-0.pdf	G.2.2	Could you explain the urgency of Section G.2.2 (points 1-3) in the GGL regulation to our potential clients, as the stated requirements are applicable to other schemes, not the GGL scheme?	Technical content	Accepted – partially implemented	Yes	02-Feb
101	Certification Body	GGL Regulation v8-0.pdf	Annex I	In relation to the IRCA 9001 training requirements for auditors, where the revised regulation allows for Exemplar Global (Personnel Certification) or similar certification agreed upon by GGL, does this also apply to equivalent IRCA 9001 training conducted internally by PT Sucofindo?	Governance	Not accepted – different view	Yes	02-Feb
102	Certification Body	GGL Regulation v8-0.pdf	G.Participants in GGL	Based on discussions during the GGL training in Indonesia on May 2025, it was stated that to apply for GGL certification, first collectors or traders must first complete a biomass purchase transaction. However, we checked the new GGL document and found no clause requiring this as a prerequisite for first collectors or traders to apply for GGL certification. Could you clarify this statement?	Technical content	Not accepted – different view	Yes	02-Feb

117 feedback items as received (20/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
103	Regulator	GGL Document structure v1-0.pdf	D.3	Can Applicants choose to be certified against the old or the new standards during the Transition period, or only Participants?	Document structure	Accepted – implemented	Yes	09-Feb
104	Regulator	GGL Document structure v1-0.pdf	D.3	Can Certification Bodies that have not updated their accreditation scope with their NAB, also certify against newly Adopted documents during the Transition period?	Document structure	Accepted – partially implemented	Yes	09-Feb
105	Consultant	GGL Regulation v8-0.pdf	Sectie E.2	Audits shall follow ISO-19011 (was requirement 4.6)	Technical content	Accepted – implemented	Yes	11-Feb
106	Consultant	GGL Regulation v8-0.pdf	Sectie E.2.4	Annual audits shall be on-site when CB assesses that that is required based on explicit trade-off	Technical content	Accepted – implemented	Yes	11-Feb
107	Consultant	GGL Regulation v8-0.pdf	Sectie E.2.7	Requirements for audit reports with reference ISO 17021:2015 missing	Technical content	Accepted – implemented	Yes	11-Feb
108	Internal GGL review process	GGLS1 - Chain of custody criteria v4-0.pdf	Principle 5.02	Add requirement that raw material entering with a Raw Material statement, can only fall within 1 GGL category, come from a single source and have the same product characteristics.	Document structure	Accepted – implemented	Yes	16-Feb
109	Consultant	GGL Instruction B.0 - FIT FIP - Module v1-9.pdf	General	Harmonize terms for supplier and/or producer, source land and add charts	Document structure	Accepted – implemented	Yes	23-Feb
110	Internal GGL review process	GGL Instruction B.0 - FIT FIP - Module v1-9.pdf	Principle 9	Add ILO-requirement regarding Child labor and strengthen reference.	Technical content	Accepted – implemented	Yes	23-Feb
111	Certification Body	GGL Instruction B.0 - FIT FIP - Module v1-9.pdf	Principle 4	Align with EUDR cutoff but remove reference to commodities	Technical content	Accepted – implemented	Yes	23-Feb

117 feedback items as received (21/21)

Nr	Stakeholder group	GGL Document	GGL Document section	Feedback item	Feedback type	GGL response	Approval	Date closed
112	Certification Body	GGL Regulation v8-0.pdf	Section F	No rules for transfer of Participant to another CB upon CB suspension	Governance	Accepted – implemented	Yes	02-Mar
113	Internal GGL review process	GGL Partner code of conduct v1-0.pdf	Section B	Incorporate ILO requirements	Document structure	Accepted – implemented	Yes	02-Mar
114	Internal GGL review process	General		Wording and text edits	Formatting or layout	Accepted – partially implemented	Yes	02-Mar
115	Regulator	GGL Instruction B.0 - FIT FIP - Module v1-9.pdf		Reporting requirements for Certified/Controlled mix no longer required.	Technical content	Accepted – implemented	Yes	02-Mar
116	Internal GGL review process	General		Various suggestions Gemini ref supersession or amendment of Standards by Modules	Formatting or layout	Unclear	Yes	02-Mar
117	Certification Body	GGL Regulation v8-0.pdf		Cooperation regarding sharing audit reports is required in line with other certification schemes, upon CB transfer	Governance	Accepted – implemented	Yes	02-Mar