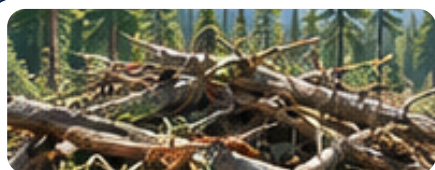


Quick Reference: Which Forest Feedstocks May Qualify Under the Renewable Fuel Standard?

A practical guide for forest industry participants considering RFS-eligible woody biomass supply

For renewable fuels produced under the Renewable Fuel Standard (RFS), not every ton of woody biomass that is physically available is necessarily an eligible feedstock. Eligibility depends on what the material is, where it comes from, why it was removed, and whether its origin and handling can be documented through the supply chain.

1 Qualifying material categories



✓ Slash from qualifying logging operations

Generally includes treetops, limbs, branches, bark and other residues generated incidentally as part of a logging operation.

- Must be incidental to a legitimate logging or forest-management operation.
- Must come from a qualifying source tract under current RFS rules.
- Should be documented through a harvest plan and chain of custody.
- Whole trees removed in a final harvest should not automatically be counted as slash.



✓ Silvicultural thinnings

Whole trees can qualify when removed to reduce stand density and concentrate growth on remaining, more desirable trees.

- Must have a legitimate silvicultural purpose.
- A substantial residual stand must remain after thinning.
- The purpose should be documented through a management or harvest plan.
- Thinning during a final harvest does not qualify as a pre-commercial thinning.



✓ Mill & manufacturing by-products

Can include sawdust, chips, bark and other woody by-products from processing qualifying material.

- Practical qualification is often constrained under current implementation.
- Source material must be traceable to qualifying feedstock.
- Commingling with non-qualifying material creates major challenges.
- Segregation and documentation are critical.

2 Material that is not automatically eligible feedstock under the RFS

- ✗ Merchantable whole trees removed as part of a final harvest
- ✗ Small or low-value whole trees from a final harvest that do not meet pre-commercial thinning requirements
- ✗ Urban tree waste and landscaping material
- ✗ Construction and demolition wood
- ✗ Material from non-qualifying source lands

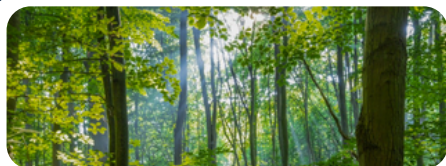
- ✗ Pallets, railroad ties, utility poles and similar post-consumer wood
- ✗ Mixed mill residues where qualifying origin cannot be demonstrated
- ✗ Storm, wildfire, or other disturbance debris, unless eligibility and an applicable pathway have been specifically established



Physical availability alone does not make material RFS - eligible

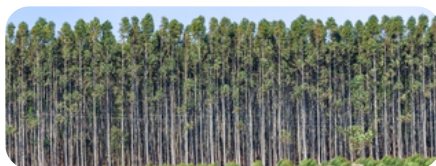
3 Where the wood comes from also matters

Source-land rules affect whether material can practically qualify under the current RFS.



✓ Natural forests

- May qualify when sourced from non-federal land.
- Must not come from excluded ecologically sensitive land or old-growth / late-successional stands.
- The source land should be clearly geographically identifiable.
- Tribal land eligibility may require case-specific review alongside other RFS requirements.



✓ Managed planted timberlands

- Generally refers to planted timberlands or managed planted forest stands.
- The stand should generally be at least 1 acre and clearly identifiable.
- Records should show that the land was established/cleared and actively managed before December 19, 2007.
- Current certification alone may not be enough without supporting historical documentation.
- Traceable land-history records are important.



✓ Federal forests and WUI removals

- Material from federal forests are not automatically counted under the ordinary categories discussed here.
- A limited exception has been discussed for certain material removed in areas at risk of wildfire near buildings, infrastructure, or regularly occupied areas.
- Under current implementation, this remains practically constrained and should not be assumed eligible without specific confirmation and an applicable pathway.

4 Documentation and traceability matter

Potentially qualifying material must generally be supported by sufficient documentation to demonstrate its origin and maintain its identity through the supply chain.

 Management plans, timber harvest plans, or silvicultural prescriptions	 Timber contracts	 GPS tract maps, or GIS information
 Identification and boundaries of the source tract	 Load tickets	 Records of intermediate storage and handling
 Land ownership and land-history records	 Truck weights and volumes	 Procedures preventing comingling with non-qualifying material



Chain-of-custody: From forest to facility, the material should remain identifiable, documented, and protected from mixing with non-qualifying feedstocks.

5 A practical rule of thumb

❓ **Ask: Could this wood's source, reason for removal, eligibility and chain-of-custody be demonstrated well enough for a renewable fuel producer to rely on it under RFS?**

Note: This information is intended as a high-level reference only, not a legal or regulatory determination of feedstock eligibility. Project developers should work directly with EPA and qualified third-party compliance auditors regarding qualification and documentation of specific feedstocks.