

SURE-Notification of 06.06.2025:

Verification of forest biomass before RED III transposition in Member States

Having in consideration the practical difficulties created by the gap between the entry into force of RED III and its transposition by the MS, **SURE EU has specified the process of verification of the forest biomass producers until the RED III is transposed in the Member States (MS)** under the SURE EU System.

Only in the cases where RED III is not yet transposed into national law and therewith Art. 29 (6a - vi) and 29 (6a - vii) are not implemented yet, former Self-Declarations issued under RED II (before 21st of May 2025) with a low-risk status in a **group certification process** may still continue being valid until the end of their regular validity period, if:

- the group manager, with reference to RED III Art. 30 (4), provides the required evidence directly at sourcing area level by having internal processes in place that verifiably ensure that the forest biomass is not sourced from the lands that have the statuses referred to in RED III Art. 29 paragraph 3 (a), (b), (d) and (e), paragraph 4 point (a) and paragraph (5).

In other words, a valid self-declaration issued as 'low risk' under RED II remains valid until the end of their regular validity period if the group manager has a management system in place and provides evidence of compliance with Article 29 (6a-vi) in its audit. In this case, there is no need to reissue Self-Declarations, and sample inspections remain a valid means of verifying compliance.

If the **validity of a low-risk self-declaration expires after 21 May 2025 but before a national implementation of RED III comes into force**, a RED III self-declaration with (provisional) low-risk status may be submitted if:

- the legislative process for the national RED III implementation has started and
- the legal framework is effective by 31 December 2025 at the latest and
- a preliminary risk assessment recognized by SURE and based on this legal framework in the legislative implementation process is available with the result of a low risk for the corresponding sourcing area.

If **no national implementation of RED III has taken place by 31 December 2025 or the risk is not assessed as low-risk**, the self-declarations with provisional low-risk status immediately apply as specified risk self-declarations.

All group members producing forest biomass with a change of status from low-risk to specified risk or without risk assessment **must be subject to a follow-up inspection after 31.12.2025**. The follow-up inspections must be conducted under specified risk criteria or criteria for no available risk assessment.

For this purpose, the **inspections of the affected group members by the CB must be started within 6 months (by 30.06.2026 at the latest) and must be completed by 31.12.2026 at the latest**. If applicable, the follow-up inspections also fall within the regular recertification time frame.

If there are any questions please do not hesitate to ask.

Your SURE Team