



## Scheme principles for the certification process – Requirements and specifications

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# 1 Introduction

Economic operators who want to provide proof of the sustainability of electricity and heat produced from biomass in accordance with the requirements of Article 29 (2) to (7) and (10) of Revised Directive (EU) 2018/2001 (RED III) must supply reliable information demonstrating compliance with these sustainability criteria. The information provided must be confirmed by an appropriate and independent audit.

The audit covers not only the question of whether the sustainability criteria have been respected and complied with, but also whether the documentation used by the economic operators is accurate, reliable and fraud-proof. The frequency and method of verification and the reliability of the data must also be assessed.

SURE is a voluntary scheme that provides proof of compliance with the sustainability criteria in accordance with the requirements of RED III through independent audits. These scheme principles explain the prerequisites and requirements for neutral inspections and describe how they are conducted in detail.

## 2 Inspection system

To guarantee the sustainable production of solid and gaseous biomass fuels and the sustainable production of electricity and/or heat from them, the participants in the value chain must be inspected. The certification body approved by SURE and accredited by national authorities performs regular audits, called scheme audits, of the scheme participant. The audit results are documented in an audit report, approved by the certification body and entered into the SURE database. A successful scheme audit is the prerequisite for SURE certification and certification is the prerequisite for selling sustainable biomass.

Economic operators along the *entire value chain, including conversion plants* that want to be certified under the SURE-EU voluntary scheme must first register with SURE. This can be done online at [www.sure-system.org](http://www.sure-system.org). The individual steps for joining the scheme are described in detail in the SURE document “Scope and basic scheme requirements”.

Economic operators choose one of the certification bodies approved by SURE to conduct neutral inspections. A list of the approved certification bodies and their contact information is published online at: [www.sure-system.org](http://www.sure-system.org). After a contract is signed between the economic operator and the certification body, the selected certification body submits the legally binding declaration on performing audits in the SURE-EU system and carries out the audit.

The economic operator to be certified must become thoroughly familiar with the SURE-EU scheme requirements prior to the audit. The scheme documents are available for downloading from the SURE system's website at [www.sure-system.org](http://www.sure-system.org).

The audit and certification process comprises the following steps:

- ✓ The commissioned certification body conducts the initial audit of the operation (on-site audit and evaluation of the scheme requirements).
- ✓ The certification body writes the audit report, submits it for peer review and certification decision and saves it in the SURE database.
- ✓ SURE registers the audit report.
- ✓ The certification body issues the certificate (or, if requested, the inspection certificate) after a positive certification decision and enters the data in the SURE database ([www.sure-system.org](http://www.sure-system.org)). All valid certificates are published at [www.sure-system.org](http://www.sure-system.org).

*The economic operator may only start to supply or use sustainable biomass or biomass fuels or submit the declaration "Electricity or heat produced from sustainable biomass" (or equivalent) once these steps have been completed.*

- ✓ Re-certification audit within 12 months, etc.

## 2.1 Types of audits

There are two types of neutral inspections: *scheme and special audits*.

### 2.1.1 Scheme audits

During a scheme audit, compliance with the scheme requirements is checked according to the phase-specific SURE checklists. The scheme audits include the *initial audit*, *re-certification audit*, *surveillance audit* and *follow-up audit*.

#### ✓ **Initial audit**

An initial audit (prior to approval for participation in the SURE-EU system) is a fixed component of the scheme and mandatory.

The initial audit is the first verification and assessment of compliance with the SURE-EU requirements prior to certification of an economic operator. During the initial audit, the processes are checked for coherence, and the documentation checked to ensure that they are accurate, complete, consistent and plausible.

*The initial audit shall always be on-site and shall as a minimum provide reasonable assurance on the effectiveness of its internal processes.* The economic operator

applying for an initial audit discloses to the auditor all relevant information prior to the initial audit, including the mass balance data and, where applicable, auditing reports of other voluntary schemes the economic operator is or was participating in the last 5 years, including any decisions to suspend or withdraw their certificates in that period.

In case of group management activities there has to be at least one completely filled in and signed self-declaration available at the time of the audit on site.

### ✓ **Re-certification audit**

The re-certification audit is a complete scheme audit that verifies whether the operation still meets the scheme requirements and has implemented any corrective measures that may have been agreed. Processes and documents are checked retrospectively and sample inspections carried out. The re-certification audit and the subsequent decision about certification are carried out before the existing certificate expires to ensure that certification is continuous. Every operation bears sole responsibility for ensuring that the relevant deadlines are met.

The certification body must inform SURE before recertifying an economic operator if a serious violation of the following SURE requirements is found:

- truthful and accurate declaration of all RED III-relevant schemes during the registration process in which the economic operator participates or has participated
- prior to and during the audit, all relevant information must be submitted to the auditor; this includes, the mass balance, GHG calculations and other evidence
- the fulfilment of the sustainability criteria remains guaranteed

Any serious violation identified during a re-certification audit will be subject to the procedure outlined in section 2.5.

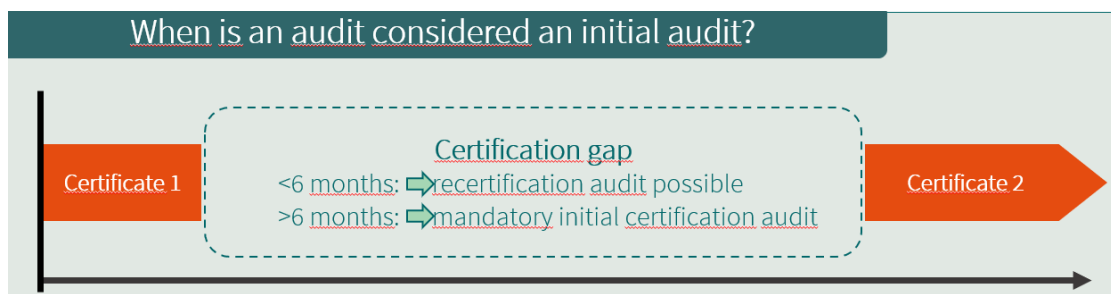
*A re-certification of existing scheme participant under a revised regulatory framework shall always be on-site and shall as a minimum provide reasonable assurance on the effectiveness of its internal processes.*

Note: SURE generally assumes that certification bodies schedule re-certification audits in such a way that no certificate gap occurs.

Should a **certificate gap** occur for whatever reason, the following rule applies:

In the event of a certificate gap that is greater than 6 months, the certification body must conduct an initial audit with all the resulting consequences (e.g. remote audit not allowed, surveillance audit obligation of the German sustainability regulations).

In addition, auditors must retrospectively check for at least 12 months to what extent the handling of biomass was also in compliance with the regulations during the period not covered by a valid certificate (e.g. sustainable and non-sustainable biomass in mass balancing system).



**Figure 1:** When is an audit considered an initial audit

### ✓ **Surveillance audit**

A scheme audit conducted during the period of validity of the SURE-EU certificate to assess whether the participant continuously meets the requirements for certification. In the SURE-EU scheme surveillance audits are conducted not mandatory but following a risk-based approach (e.g. see also chapter 2.4.1 Risk assessment for producers of waste and residues).

### ✓ **Follow-up audit**

A follow-up audit is required if more serious non-conformities related to the fulfilment of the SURE-EU requirements are found during the previous audit that would prevent participation in the scheme or would result in the loss of the existing certification. A follow-up audit, to be carried out within three months of the previous audit, must prioritise ensuring that the agreed corrective actions have been implemented. *In the period between the failed audit and the follow-up audit, including a positive certification decision, the operation may not supply any products certified as sustainable.*

If a follow-up audit has not been performed after three months, a complete initial audit is required.

## 2.1.2 Special audits

Special audits may be mandated and/or carried out by SURE when a violation is suspected or when crises, incidents or other reasons arise.

In addition, special audits also represent a quality assurance measure of the scheme operator. The certification bodies and scheme participants to be inspected are selected using objective criteria. Quality criteria (e.g. review of the audit reports and analysis of the certification

process as part of SURE monitoring or on the basis of complaints or if external third parties have reported possible non-conformities to the scheme) as well as financial figures (e.g. number of certificates issued) are both included. In addition, special audits can also be initiated based on a sample selection, mainly by auditors and certification bodies. Special audits of scheme participants, auditors or certification bodies can be accompanied by SURE auditors or carried out independently by SURE auditors.

There are different kinds of special audits:

✓ **Office audits**

As part of an on-site “office audit”, the quality of selected certification processes as well as the certification processes in the certification body are reviewed, among other things, in a document check. SURE reserves the right to carry out office audits *of certification bodies* with its own staff and/or by people appointed by SURE.

✓ **Shadow audit**

A shadow audit is an *unannounced audit of a scheme participant*. The audit is carried out by a SURE employee (or a person appointed by SURE) at the scheme participant's site.

✓ **Witness audit**

A witness audit is when an auditor approved in the SURE system is accompanied.

Observation of an audit (witness audit) is an activity carried out by a SURE employee (or a person appointed by SURE) who observes an audit performed by an auditor or team of auditors from a certification body appointed by SURE without interference or influence. Depending on what the objectives of the witness audit are, an entire scheme audit can be observed or only relevant parts thereof. Witness activities are carried out on-site at the premises of the certification body's customer or electronically as a remote audit (see SURE document “Technical guidance for conducting remote audits”).

✓ **Spot audits**

A spot audit is an audit announced at short notice. Spot audits usually focus on checking reports of non-scheme-compliant activities/conduct or selected sustainability criteria. This type of audit can be carried out both at a scheme participant and at a certification body.

Office and witness audits are also conducted by the accreditation bodies/competent parties at the certification bodies,

## 2.2 Audit methods

To conduct the audit effectively and efficiently, the individual(s) managing the audit programme should select and determine the methods for the audit depending on the defined audit objectives, the defined audit scope and the defined audit criteria.

Audits can be carried out on site, remotely or through a combination of both. In the SURE-EU system, conformity with the requirements of RED III is usually verified on site.

The use of methods should be appropriate and balanced, taking into account the possibilities and limitations involved (in accordance with ISO 19011: Guide for auditing management systems).

### ✓ **On-site audit**

An on-site audit is carried out at the scheme participant's site by a SURE approved and registered auditor. The auditor verifies the system participant's conformity with the requirements of the SURE-EU system by, *in addition to checking the documentation, personally inspecting* the locations where activities relevant to the audit objective take place, conducting interviews with the people involved and checking, evaluating and documenting the facts.

### ✓ **Desk audits**

A desk audit is not carried out at the site of the audited party.

In the case of a desk audit, documents within the scope of an audit are checked to ensure that they are complete, correct, consistent and up-to-date outside the location of the audited party. The audited party's compliance with the requirements of the SURE-EU system is verified on the basis of the documentation.

This audit method is possible as long as

- the same depth of inspection can be guaranteed
- the security and confidentiality of electronic and electronically submitted information is guaranteed
- it is carried out by mutual consent between the auditor and the audited party

The information obtained is usually used to plan the on-site audit. The desk audit also gives an indication of the effectiveness of the audited party's document management system.

### ✓ **Remote audit**

A remote audit is a method, permitted only under certain conditions (see the SURE document "Technical guidance for conducting remote audits"), of carrying out an

audit no longer solely on site with the physical presence of the people involved, but virtually with the aid of suitable *information and communication technologies (ICT)*.

Remote audits are *not permitted* if

- the scheme participant is being audited to verify conformity with the requirements of the SURE-EU system for the first time
- major non-conformities were found during the last audit
- significant changes have occurred, e.g. in site management, processes, activities or responsibilities for relevant processes
- there are risks that jeopardise the effectiveness of the audit (e.g. classified information)

SURE assumes that remote audits are not the norm, as they cannot replace face-to-face contact and on-site assessment. (see SURE document “Technical guidance for conducting remote audits”)

## 2.3 Process and duration of audits/inspections

Audits/inspections must be carried out in accordance with the requirements of ISO 19011.

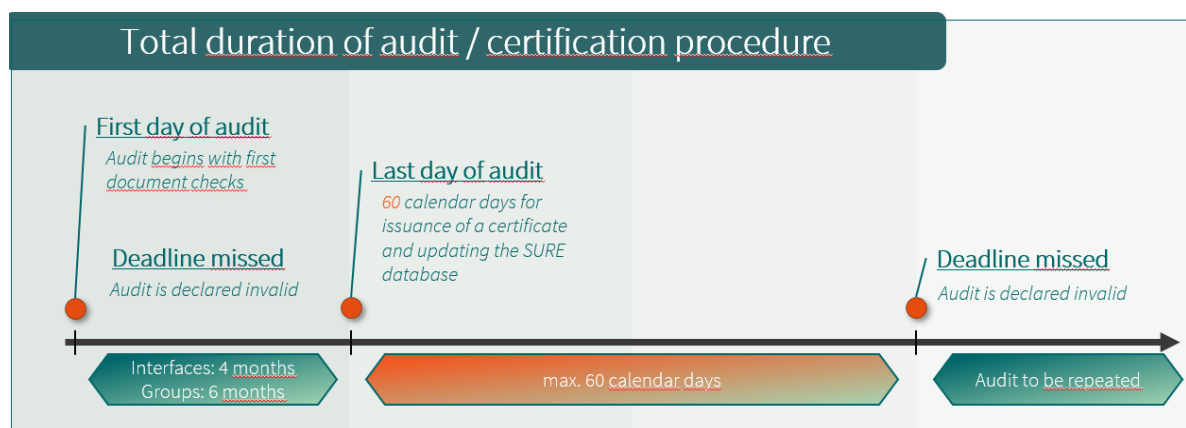
The duration of the audit/inspection is determined by the respective certification body and contractually agreed with the respective scheme participant prior to beginning the audit.

SURE, however, has the right to define a minimum duration for the respective scope in the future, particularly based on the audit/inspection results, in the interest of quality assurance.

### ***Total duration between first and last day of audits/inspections:***

- ✓ for interfaces: max. 4 months between day 1 and last day of audit
- ✓ for group member inspections: max. 6 months between first and last (sample) inspection of group members

In case the deadlines are not met audits/inspections must be fully repeated.



**Figure 2:** Total duration of audit / certification procedure

The audit must include the following elements at a minimum:

- ✓ Identification of the activities undertaken by the economic operator which are relevant to the scheme's criteria
- ✓ Identification of the relevant systems of the economic operator and its overall organisation with respect to the scheme's criteria and checks of the effective implementation of relevant control systems
- ✓ Analysis of the risks which could lead to a material misstatement, based on the auditor's professional knowledge and the information submitted by the economic operator. That analysis takes into consideration the overall risk profile of the activities, depending on the level of risk of the economic operator and the supply chain, above all at the immediately upstream and downstream stages, for example, for economic operators that handle material listed in Annex IX of the RED III. The audit intensity or scope, or both, must be adapted to the level of overall risk identified, also based on plausibility checks of the production capacity of a plant and the declared quantities of produced fuels; a verification plan which corresponds to the risk analysis and the scope and complexity of the economic operator's activities, and which defines the sampling methods to be used with respect to that operator's activities
- ✓ Implementation of the verification plan by gathering evidence in accordance with the defined sampling methods, plus all relevant additional evidence, upon which the verifier's conclusion will be based
- ✓ Elements of audit trails, an explanation of variations, or the revision of claims or calculations, before reaching a final verification conclusion
- ✓ Verification of the accuracy of data recorded by the economic operators or their representatives in the Union database

## 2.4 Audit intervals

The certification body must conduct a complete scheme audit at least once a year to determine whether the operation still satisfies the requirements for certification.

The re-certification audit and the subsequent decision about certification are carried out before the existing certificate expires to ensure that certification is continuous.

The frequency and intensity of the auditing procedure must reflect the overall level of risk. SURE has defined clear rules, commensurate to the level of specific risk associated with the type of residues or waste. The on-site audit may be based on a sample where a group auditing approach is taken.

### 2.4.1 Risk assessment for producers of waste and residues

A risk assessment is required for all economic operators subject to certification. A risk assessment is also required for each group of producers of waste and residues.

At least the following factors have to be considered. It is at the discretion of the certification body to base the risk assessment on further criteria:

- ✓ ***Particularly eligible waste (e.g. according to Annex IX REDIII)***

Special eligibility of biomass fuels may create incentives for misdeclaration. If the risk assessment identifies a special eligibility of waste or residues from biomass, a low sustainability risk cannot be assumed.

- ✓ ***Type and amount of possible subsidies***

To promote the use of biomass fuels from waste or residues, support systems can set particularly attractive incentives, such as higher remuneration in feed-in tariff systems or higher crediting in quota systems. If special promotion of waste or residues from biomass is identified in the risk assessment, this must also be taken into account in the determination of the audit / inspection depth and frequency.

- ✓ ***Waste type-typical quantity per month***

The specific amount of biomass waste or residues delivered may be a factor in the risk assessment of economic operators in the waste and residue sector if they represent a significant amount of waste or residues depending on the type of waste or residue and typical industry values.

The supply of above-average quantities of waste or residual materials from biomass must be taken into account in the risk assessment to a greater extent than small quantities of the same category of waste or residual materials.

✓ **Existing monitoring or certification**

If an operator that supplies or uses biomass waste or residues is subject to another certification system recognized by a national competent authority that monitors the type, quantity, origin, or generation of the materials, this may have a risk-reducing effect in the risk assessment.

✓ **Reports in media or public**

If the biomass waste or residue in question is subject of negative reporting in the mainstream media, this must be reflected in the risk assessment. The result of the risk assessment indicates the level and frequency of audits and inspections.

Depending on the risk level identified in the risk assessment, following action might be chosen by the certification body.

Action	Risk level low	Risk level medium	Risk level high
Scope	Square root	Square root x 2	100 %
Audit methode	Desk audit	Combination desk audit and on site audit	Combination desk audit and on site audit
Frequency	Regular audit cycle	Surveillance audit after 6 months	Surveillance audits after 3 and 6 months

**Table 1:** Actions and risk level

The evaluation process and result of the risk assessments as well as the decision-making process of the certification body must to be documented and made available to SURE upon request

## 2.5 Evaluation of the audit results

The evaluation of the SURE requirements and the respective number of points are shown in the table below.

Evaluation	Explanation	Number of points
Compliant	Complete compliance	20
Minor	Minor non-conformity	15
Major	Major non-conformity	5
Critical (KO)	Scheme requirements are not fulfilled	0
N/A	Scheme requirements are not applicable requirements evaluated as N/A must be explained in the audit report), not all criteria can be evaluated as N/A	0

**Table 2:** Evaluation options in the SURE-EU system

Some of the criteria are defined as KO (see checklist valid at the time). Because not satisfying a defined KO criterion puts the integrity of the scheme at risk, a certificate cannot be issued following a KO evaluation. In this case a new audit (follow-up audit or scheme audit) must be carried out. The new date must be agreed with the respective certification body.

If a criterion which was not previously defined as a KO criterion is found to be critical in the subsequent audit, it can be evaluated as KO in the follow-up audit.

The *preliminary result of the audit* is determined by the auditor at the end of the audit and explained to the audited company. Points are used to weight the results. Depending on the number of points achieved or whether a criterion is evaluated as critical, the audits are categorised in the following groups:

✓ **Level 1: compliant (100%)**

No problems were found, the SURE-EU requirements are fully satisfied. The total number of possible points is achieved.

→ Certificate/inspection certificate can be issued

✓ **Level 2: partially compliant (75– 99%)**

The scheme requirements are not fully satisfied but the non-conformities found do not put the scheme integrity at risk. A minimum of 75% of the total number of possible points is achieved.

The corrective measures agreed with the certification body must be implemented by the dates specified.

→ Certificate/inspection certificate can be issued once the auditor responsible has accepted the corrective measures proposed by the operation and the time periods for their implementation.

✓ **Level 3: non-compliant (< 75% and/or KO evaluation(s))**

Significant problems were found in the fulfilment of the SURE-EU scheme requirements. Scheme integrity is not assured. Less than 75% of the total number of possible points is achieved.

→ No certificate/inspection certificate.

The problems found are tracked and sanctions initiated (not for initial certifications) in accordance with the SURE sanction system. (see SURE document “Scheme principles for integrity management”)

If the result is level 3 (non-compliant: < 75% and/or KO (knock-out) evaluation), the neutral certification body is required

- ✓ to inform SURE within 24 hours (i.e. send the audit report to SURE in electronic form)
- ✓ to agree to corrective measures with the audited company and
- ✓ to define a time period or a deadline by which the operation has to verify implementation of the corrective measures – usually through another on-site inspection. The follow-up audit must have been conducted no later than three months after the previous audit. If after three months no follow-up audit has been carried out, a full scheme audit is required to obtain a new SURE confirmation of conformity.

The certification body must inform SURE if, prior to re-certification of an economic operator, proof is provided of a violation of one or more of the following SURE requirements:

- ✓ truthful indication of whether the economic operator is participating in other (voluntary) schemes based on RED
- ✓ presentation of all documents and information relevant to the auditor, including the mass balance and the latest audit report
- ✓ or another violation of the mandatory sustainability criteria

### 2.5.1 Definitions of non-conformities

Non-conformities identified during an audit are classified as *KO, critical, major and minor*.

*KO-definition of SURE-EU criteria* are requirements which, if not complied with, have a particularly critical effect on scheme integrity or which are extremely important for the scheme for other reasons.

An intentional violation of a voluntary scheme's standards such as fraud, irreversible non-conformity or a violation that jeopardises the integrity of the voluntary scheme is considered to be a *critical non-conformity*.

*Critical non-conformities* include, but are not limited to, the following:

- a) non-compliance with a mandatory requirement of the Revised Directive (EU) 2018/2001, such as land conversion which contravenes Article 29(3), (4) and (5) of that Revised Directive
- b) fraudulent issuance of proof of sustainability, for example, intentional duplication of proof of sustainability to seek financial benefit
- c) deliberate production of wastes or residues, for example, the deliberate modification of a production process to produce additional residue material, or the deliberate contamination of a material with the intention of classifying it as a waste

Failure to comply with a mandatory requirement of the Revised Directive (EU) 2018/2001, where the non-conformity is potentially reversible, repeated and systematic problems, or aspects that alone, or in combination with further non-conformities, may result in a fundamental system failure, are considered to be a major non-conformity.

*Major non-conformities* include, but are not limited to, the following:

- a) systematic problems with mass balance or GHG data reported for example, incorrect documentation is identified in more than 10% of the claims included in the representative sample
- b) the omission of an economic operator to declare its participation in other voluntary schemes during the certification process
- c) failure to provide relevant information to auditors for example, mass balance data and audit reports

A non-conformity that has a limited impact, constitutes an isolated or temporary lapse, is not systematic and does not result in a fundamental failure if not corrected, is considered to be a *minor non-conformity*.

### 2.5.2 Corrective measures, time periods and impacts

All evaluations, except where there is 100% compliance, must be transparently explained in the audit report. For all minor, major and critical/KO evaluations, corrective measures are also defined, including appropriate time periods and responsibilities.

For minor, major and critical/KO non-conformities, the audited company proposes corrective measures to the auditor.

The action plan documents the evaluations with the respective comments and corrective measures, including appropriate time periods and responsibilities. If it was not possible to completely define the action plan during the audit, it must be finalised with the responsible auditor at the latest 7 days after the audit by the audited party and submitted to the certification body. In the case of criteria evaluated as major, critical and KO, measures must be defined immediately.

The scheme participant is responsible for implementing the corrective measures within the time period agreed with the certification body.

#### *Criteria evaluated as minor*

- ✓ corrective measures must be verifiably implemented no later than by the next regular audit
- ✓ in the case of a re-certification process: certificate issued

#### *Criteria evaluated as major*

- ✓ corrective measures must be verifiably implemented no later than 40 days after the audit. Extraordinary circumstances may justify an extension of the time limit by another 20 days. Any such extension is subject to the PRIOR consent of SURE.
- ✓ no certificate is issued (initial audit) until the agreed corrective measure(s) has (have) been implemented in a verifiable, appropriate and timely manner
- ✓ existing certificate immediate suspended for a maximum period of 40 days if the deadline for implementing measures is not met
- ✓ existing certificate withdrawn if, during the period of suspension, the agreed corrective measure has not been implemented in a verifiable, appropriate and timely manner

#### *Criteria evaluated as critical*

- ✓ immediate suspension of an existing certificate (for surveillance or re-certification audits)
- ✓ corrective measures must be verifiably implemented no later than 30 days after the audit
- ✓ no certificate is issued (initial audit) until the agreed corrective measure has been implemented in a verifiable, appropriate and timely manner.
- ✓ the certificate is withdrawn if the 30-day time period for implementing measures is exceeded

#### *Criterion defined as KO*

- ✓ failure to comply with any of these criteria results in suspension or withdrawal of the certificate and triggers sanction proceedings (except for an initial audit)

*During a suspension of a SURE-EU certificate, participants may NOT declare biomass as sustainable.*

*Scheme participants with a suspended certificate may not join another scheme with the same scope.* Every potential SURE scheme participant must disclose upon registration whether and to what extent the applicant has already been or is a participant in another (voluntary) scheme (see SURE document “Scope and basic requirements of the SURE system”, section 6.5).

The certification bodies are required to immediately update the status of a certificate in the database. The certification body verifies that the corrective measures have been implemented.

If agreed corrective measures have not been effectively implemented resulting in a new non-conformity with the corresponding requirement in a subsequent audit, this requirement may be given a lower evaluation.

SURE reserves the right to set other time periods for the corrective measures based on the respective degree of fulfilment.

## 2.6 Reporting

After the audit, the auditor creates an audit report using the report forms provided by SURE that are part of the phase-specific checklists. This report must be countersigned by the person responsible in the audited operation. This may be done by digital signature or by means of manual signature on the first page of the audit report (cover sheet).

The audit report and/or checklist contains information about:

- ✓ the beginning and end of the audit (duration of the audit),
- ✓ the address where the audit was conducted
- ✓ the audit participants
- ✓ the result of the audit
- ✓ the evaluation of each individual requirement
- ✓ a list of the documents checked

The audit report also contains information on the scope of the operation to determine the scope of the audit, the type of biomass and any agreed corrective measures including their implementation. By collecting this information, the audit report also gives a comprehensive overview of the audit and certification process.

Copies of the audit report and certificate are submitted to SURE and stored in the SURE database no later than 60 calendar days from the first day *after* the audit. As part of internal monitoring, SURE requires certification bodies to provide all audit reports and actual GHG value calculations (including relevant background information where appropriate) on the use of GHG emission saving credits ( $e_{ccr}$ ,  $e_{ccs}$ ,  $e_{sca}$ ). If there are questions about the results, SURE contacts the respective certification body.

If the audit shows that the operation has not satisfied the requirements of the SURE-EU system, the report must be electronically submitted to SURE within 24 hours after the audit has been completed.

Where audits identify critical or major non-conformities, the certification body shall report these non-conformities, the agreed action plan and the timing for correction(s) to SURE.

SURE reports the identified non-conformities, corresponding action plan and timing for their correction(s) in the annual activity report to the EU-Commission and publishes the report on its website taking into account sensitive company information and the relevant data protection regulations.

## 2.7 Checking documents

When inspecting documentation, there are a number of ways to reduce the risks borne by downstream economic operators in the supply chain. For example, economic operators sometimes participate in different voluntary schemes to meet their customers' requirement to be certified under a specific (voluntary) scheme. However, this presents a particular challenge for auditors who check the mass balance because they need to have a complete picture of all relevant transactions.

The economic operators must ensure that the auditor is familiar with all schemes they participate in and that all relevant information is made available to the auditor. This includes the complete mass balance records for a site and access to reports from previous audits<sup>1</sup>.

To further improve the robustness of the verification process (audits), economic operators may only use actual values to calculate greenhouse gas emissions if an auditor has verified in advance that they have the capability to perform this calculation in accordance with the GHG emission calculation methodology.

This check can take place during the audit of the economic operator before his participation in the voluntary scheme. In addition, SURE asks the economic operator to provide the auditor with all relevant information on the calculation of the actual GHG emissions prior to the audit. The auditor in turn records the emissions incurred from processing at the inspected site (emissions after allocation) and, if relevant, the actual savings in the audit report in order to document that the calculation was thoroughly verified and understood. *If these emissions deviate significantly from the typical values, (i.e. greater than 10%, or calculated actual values of emissions savings are abnormally high (greater than 30% deviation from default values), the audit report must also include reasons that can explain the deviation.*<sup>2</sup>.

Certification bodies must immediately inform SURE of such deviations.

More information can be found in the SURE document “Technical guidance for greenhouse gas calculation”.

The auditor also receives all information on the mass balance prior to a planned audit. The last mass balances completed during the period under review must be inspected. During initial audits, the auditor must check whether a mass balance system has been set up and is functioning. Further information on mass balancing can be found in the SURE document “Technical guidance on mass balancing”.

## 2.8 Risk management

Risk management, which is an important component of the internal quality management system, is designed to ensure that the participants along the value chain are subject to in-depth inspections and at sufficient intervals so that the legal requirements set forth in the Revised Directive (EU) 2018/2001 and scheme-specific requirements for biomass production and supply can be guaranteed with the highest level of reliability.

SURE accounts for particularly critical risk criteria that endanger the integrity of the scheme for all steps along the value chain by defining them as KO criteria. Non-compliance with one of these criteria results in non-certification (under the scope of the initial/re-certification audit) or in the immediate loss of the certificate (under the scope of follow-up/surveillance audits). In the event of non-compliance with criteria that represent a low or medium risk, certification or continuation of certification is only possible if the respective corrective measures are implemented that guarantee fulfilment of the scheme requirements.

Time periods are agreed and compliance monitored depending on the severity of the discrepancy. This is the responsibility of the certification bodies and is checked regularly by SURE.

Further information on maintaining scheme integrity is contained in the SURE document “Scheme principles for integrity management”.

## 2.9 Issuing and withdrawing certificates

It is up to the discretion of the respective certification body to decide whether to issue or withdraw a certificate.

There may be a maximum of 60 calendar days between the last date of the audit and the date of certification decision and issuing the certificate. If this is the first certification, the certificate may only be issued after a scheme contract has been signed between SURE and the economic operator. The templates and forms provided by SURE must be used.

If the SURE scheme contract is terminated, any valid certificates are automatically withdrawn.

The certification bodies are required to IMMEDIATELY update the status of a certificate in the database.

These rules apply equally to inspection certificates issued on request.

#### ***Certificate status***

***Valid:*** an active certificate following the successful completion of an audit

***Suspended:*** temporary invalidated certificate due to non-conformities identified by the certification body or upon voluntary request of the economic operator

***Withdrawn:*** permanently cancelled certificate by the certification body or the voluntary scheme. Possible reasons for a certification body to withdraw a certificate include early re-certification, serious scheme violations, change of certification body

***Expired:*** certificate that is no longer valid

***Terminated:*** a certification that has been voluntarily cancelled while it is still valid

Economic operators whose certificates are withdrawn, terminated or expired are listed in the publicly accessible SURE certificates database for at least 24 months after the withdrawal, termination or expiration date.

Decisive for the validity of the certificate is exclusively the information given on the website of SUSTAINABLE RESOURCES Verification Scheme GmbH.

Deviations can result for example from the withdrawal or suspension of an issued certificate.

## 3 1<sup>st</sup> and 2<sup>nd</sup> party audit approach forest biomass

In the case of forest biomass production in a “low-risk” area, first or second-party audits up to the first gathering point are accepted. This chapter provides guidance on how these audits must be conducted to be accepted in a SURE certified supply chain.

### 3.1 1<sup>st</sup> party audit

This type of audit can be carried out by the producer of the forest biomass. In a self-assessment, it must be checked if the producer of biomass fulfils the requirements to produce forest biomass described in the scheme principles for the production of forest biomass. If they are in line with the requirements, a signed and filled-out self-statement must be provided at the first gathering point. The delivery of forest biomass is only possible if a signed self-statement is in place. The statement is valid for one year maximum.

All signed self-statements a first gathering point receives are subject to sample checks by the responsible auditor during the certification audit of the first gathering point. The number of sample checks is determined by minimum the square root of all self-statements. SURE generally expects verification on site at the forest biomass producer’s operational unit.

Forest biomass producers who sign a self-statement cannot be considered group members of a group manager under the SURE EU scheme. If they intend to deliver forest biomass to other first gathering points they must sign separate self-statements.

### 3.2 2<sup>nd</sup> party audit

The first gathering point can choose the option of supplier audits (2<sup>nd</sup> party audits). Under this approach, the producer of the forest biomass is not obliged to sign a self-declaration or self-statement. The first gathering point must enter all biomass producers into an internal register. All suppliers must be audited annually without exception by the first gathering point before delivering biomass. During the certification audit of the first gathering point, all documents of the supplier audits must be available. Furthermore, the first gathering point is obliged to conduct at a minimum the square root of registered supplier audits on-site at their operational units. The first gathering point must confirm for all producers that they have been audited and confirmed for liability reasons. The proof shall be called a liability statement.

Forest biomass producers who have been audited by the 2<sup>nd</sup> party approach cannot be considered group members of a group manager under the SURE EU scheme. If they intend to deliver forest biomass to other first gathering points, they must sign separate self-statements

or self-declarations or must go through another 2<sup>nd</sup> party audit by the other first gathering point.

The first gathering point must make sure that the auditors who conduct 2<sup>nd</sup> party audits demonstrate at least compliance with the qualification requirements laid down in chapter 7.1.4. And provide proper expertise by passing at least a mandatory SURE exam for forest biomass. The qualification review of the 2<sup>nd</sup> party auditor is part of the external certification audit.

Besides the 1<sup>st</sup> or 2<sup>nd</sup> party approach, it is still possible to certify forest biomass producers under the group management approach (3<sup>rd</sup> party). In this case, the requirements of Chapter 5 Group certification must be fulfilled.

## 4 Individual certification

Certification is generally only valid for the site (interface) at which an audit was carried out (site-specific). All economic operators along the supply chain can be individually certified.

The successfully audited independent/stand-alone site (interface) is awarded a certificate.

*Affiliated dependent/non-autonomous storage or operating sites* must be included in the interface audit and inspected. Affiliated dependent/non-autonomous storage or operating sites are storage or operating sites (e.g. concrete slabs, silos, tanks, etc.) which are part of an interface and receive biomass, weigh it if necessary and keep records of all incoming and outgoing biomass, but do not perform invoicing. Conversion plants that generate electricity and/or heat from biomass fuels are always subject to certification as a site of the last interface, even if they are operated as a dependent facility.

### 4.1 Inspections and certifications of dependent and non-autonomous storage, operating sites and logistic services

✓ ***The following applies for collectors:***

Dependent/non-autonomous storage and operating sites of collectors are subject to annual on-site inspections as part of the audit of collector.

The collectors are audited once a year (every 12 months). After a successful audit, the collector is issued a certificate with a list of all its dependent/non-autonomous storage and operating sites (dependent collection points).

✓ ***The following applies for first gathering points:***

Dependent/non-autonomous storage and operating sites of first gathering points are subject to sample inspections as part of the audit of the first gathering point.

The first gathering points are audited once a year (every 12 months). After a successful audit, the first gathering point is issued a certificate with a list of all its dependent/non-autonomous storage and operating sites.

✓ ***The following applies for all downstream interfaces:***

Sample inspections are not possible for dependent/non-autonomous storage or operating sites of economic operators downstream in the supply chain. These economic operators must be individually certified.

#### 4.1.1 Scope and process for annual on-site inspections of dependent storage and operating sites of collectors

All dependent storage and operating sites of collectors must be inspected as part of the audit of the collector. The on-site inspection does not have to take place at the beginning of the audit of the collector. It can also take place once the collector has already been audited.

The inspection of the dependent storage or operating sites must always be carried out and completed before a certificate including list of all storage or operating sites can be issued to the collector including the dependent storage or operating sites.

#### 4.1.2 Scope and process for sample inspections of dependent storage and operating sites of first gathering points

The minimum number of storage and operating sites for sample inspections is the square root of the total number of these sites ( $\sqrt{x}$ , where x is the number of all storage and operating sites) rounded up to the next whole number. The risk factors listed below serve as the basis for the sample inspections. A representative selection of the various storage and operating sites must be inspected. The following selection criteria in particular must be taken into account:

- ✓ results of the internal inspections of the storage and operating sites and assessments of the management and/or previous certifications
- ✓ documents with complaints and other relevant aspects for corrective and preventative measures
- ✓ significant differences in the size of the storage and operating sites
- ✓ deviations in shift models and work procedures
- ✓ complexity of the processes in the individual storage and operating sites

- ✓ changes since the last certification
- ✓ geographic distribution of the storage and operating sites
- ✓ additional risk criteria at the discretion of the respective certification body
- ✓ 25% of the samples are to be selected randomly

The sample inspection does not have to take place at the beginning of the audit of the first gathering point. It can also take place once the first gathering point has already been audited. The inspection of the storage or operating sites must always be carried out and completed before a certificate including list of all storage or operating sites can be issued to the first gathering point including the storage or operating sites.

#### 4.1.3 Threshold value for a failed inspection of dependent storage or operating sites of first gathering points

If a major violation is found at one of the inspected storage/operating sites, a certificate is not issued to the first gathering point (for the entire group) or the certificate is withdrawn and the certificate is deleted from the SURE database. Because only sites with valid certificates may supply sustainable biomass, neither the first gathering point nor the individual storage/operating sites may continue to sell sustainable biomass if this kind of serious violation is found. A current list with valid certificates can always be accessed on SURE's website ([www.sure-system.org](http://www.sure-system.org)).

#### 4.1.4 Audit requirements on logistics facilities

Logistics facilities are defined in the *SURE-EU system* as locations where

- ✓ biomass is only provided for transport
- ✓ short-term storage for the purpose of transshipment does not generally exceed 24 hours
- ✓ no incoming and outgoing goods are documented
- ✓ no incoming biomass is weighed
- ✓ the containers are not changed/mixed (e.g. transferred to new containers)
- ✓ delivered biomass is not processed/treated

Logistic facilities are defined accordingly as sites where goods (biomass or waste and residues) are only provided for transport. The waste regulations relevant for the use of logistic facilities must be complied with.

For those logistic facilities as described above, the following requirements apply:

- ✓ registration as an operating site in the SURE database by the collector using this facility,
- ✓ each transfer of goods via the facility has to be registered in the collector's mass balance which has to be audited at the collector's premise/office and
- ✓ annual on-site inspection of the facility as part of the collector's activities under the scope "collector".

#### 4.1.5 Audit requirements on dependent logistics services

If a collector uses external logistic services to perform its collection process (collecting waste and residues at a point of origin and transporting them to the collector's premise) these external logistic services must be inspected annually on-site as part of the collector's activities in the same way as the collector's own logistics have to be subject of the audit. Therefore, the collector has to register such external logistic services in the SURE database as an 'operating site' to assure transparency of all its activities under the scope 'collector' for the certification body in charge.

## 5 Group certification

Group certification is the certification of a group of companies where the certification applies to the group as a whole. In these cases, a selection of various operations in the group can be subject to a sample inspection as proof of conformance of all group members by the neutral certification body. The requirements of applicable standards developed for this purpose, e.g. standard P035 of the International Social and Environmental Accreditation and Labelling Alliance (ISEAL), have been included here to define general requirements for the certification of producer groups.

In the following, SURE uses the term *inspection* to mean an external review by the neutral certification body at the level of the biomass producer/waste and residue producer for group certification or the inspection of dependent operating sites.

In contrast, SURE uses the term *audit* to mean an external review of the SURE requirements of interfaces or scheme participants by the neutral certification body.

In the SURE system, successfully inspected producers are issued an *inspection certificate* on request as part of *group certification*.

*Certificates* are issued in the SURE system to scheme participants or interfaces on the basis of a successful audit.

For further explanations of terms, see also the SURE document “Definitions in the SURE system”.

## 5.1 General requirements

Group certification in the SURE-EU system is only for

- ✓ agricultural biomass producers
- ✓ forest biomass producers
- ✓ waste and residue producers

and producer organisations and cooperatives may deliver the raw material directly to the first gathering point or to storage facilities or collection points that belong to the economic operator.

This option may not be used by downstream economic operators in the supply chain. These economic operators need individual certification.

Group certification can only be used by largely homogeneous groups with an identical scope.

Groups in the agricultural and forestry sector that want to demonstrate conformity with the land-related criteria of the scheme are considered to be largely homogeneous if

- ✓ the affected areas of land are close to one another and
- ✓ have similar attributes (e.g. the same administrative region) and
- ✓ similar characteristics (e.g. same climate conditions) and

- ✓ similar production systems and products

Group certifications for the purpose of calculating GHG savings are only acceptable if the operating sites have similar production systems and products.

## 5.2 Requirements of group management

### 5.2.1 Group manager

The group must have or set up a shared main office that is responsible for managing the group and implementing the scheme requirements.

The group does not have to be an independent legal entity. However, all of the operations in the group must be legally or contractually affiliated with the main office of the group and be integrated into a common administrative system defined and set up by the main office which is monitored and controlled internally. This means that the main office is authorised to carry out internal (sample or full) inspections and to instruct the operations to take any necessary corrective action. This must be documented in the official contract between the group manager and the operations.

Requirements of the group manager:

- ✓ administration of an internal management system to create confidence that the individual group members meet the scheme requirements.
- ✓ establishment of an internal inspection procedure to monitor compliance of the group members with the requirements of the SURE-EU system.
- ✓ maintenance of an updated list of group members
- ✓ transparent representation of the delivery relationship with the operations by means of contracts or invoices
- ✓ authority to decide whether group members may join the group or be excluded
- ✓ responsible management of the certification process
- ✓ communication between the neutral certification body and the group members
- ✓ annual *on-site* audit and certification as group manager by the neutral certification body

If the group manager is not the first gathering point, the group members are obliged to provide the group manager with a copy of the proof of sustainability (PoS) for the supply chain at the time of the physical delivery of the biomass in order to ensure the traceability of the biomass to the producer.

Prior to the audit, the group manager must provide the certification body with an appropriate and practical overview of the self-declarations submitted to select the scope of the sample and the production units to be inspected with adequate lead time.

### 5.2.2 Group members

Requirements of the group members:

- ✓ proactive engagement with the SURE scheme requirements and provision of the necessary documentation
- ✓ obligation to the group manager to comply with the requirements of the SURE-EU system
- ✓ submission of a valid, signed and non-contradictory self-declaration to the group manager confirming compliance with the SURE requirements (to be updated annually)
- ✓ participation in the sample inspections to be carried out internally by the group manager
- ✓ participation in the sample external inspections to be carried out by the neutral certification body
- ✓ obligation to remedy any problems found in the internal and external inspections within the agreed time periods

If the group manager is not the first gathering point, the group members are obliged to provide the first gathering point a proof of sustainability (PoS) for the supply chain for each physical delivery of the biomass. The certificate ID of the group manager must be stated on the PoS to ensure the traceability of the delivered biomass. In addition, the group membership must be confirmed by specifying the unique identifier of the self-declaration submitted to the group manager on the PoS.

A copy of the PoS is to be submitted to the group manager at the time of the physical delivery of the biomass.

## 5.3 Self-declaration

All group members without exception must submit a valid, signed and non-contradictory self-declaration.

A unique identifier must be included in the self-declaration to enable a clear assignment of transmitted PoS to the group member.

### 5.3.1 Agricultural biomass producers

In the case of *agricultural biomass producers*, a distinction is made between CAP-Conditionality (= formerly cross-compliance) and no CAP-Conditionality (= formerly non-cross-compliance) farms in the SURE-EU system. The following self-declarations are therefore available for submission:

✓ ***Self-declaration for producers of agricultural biomass CAP-Conditionality (= formerly cross-compliance)***

The agricultural biomass producer confirms with his signature, among others, that he is a recipient of direct payments and therefore subject to CAP-Conditionality (= formerly cross compliance) and that the biomass meets the requirements for the production of agricultural biomass (Art. 29 of Revised Directive (EU) 2018/2001 or SURE scheme principles for the production of agricultural biomass).

✓ ***Self-declaration for producers of agricultural biomass that is non CAP conditionality (= formerly not cross-compliance)***

The agricultural biomass producer *not subject to CAP-Conditionality (= formerly cross compliance)* confirms with his signature, among others, that he meets the requirements of the SURE-EU system for the production of sustainable agricultural biomass.

### 5.3.2 Forest biomass producers

In the case of *forest biomass producers*, the risk-based approach of the SURE-EU system makes a distinction between “low-risk” and “specified-risk” sourcing areas. In addition, if there is no risk assessment for the biomass sourcing area, it is possible to confirm compliance with the requirements of the SURE-EU system by means of a self-assessment using the self-declaration for specified-risk areas.

The following self-declarations are therefore available for submission:

✓ ***Self-declaration for producers of forest biomass (low-risk)***

***Low-risk area:*** A current risk assessment, recognised by the SURE-EU system, is available for the entire biomass sourcing area, which analyses and assesses the risk of unsustainably produced forest biomass in accordance with RED III and classifies it as “low-risk”. The risk assessment confirms that a legal framework is in place and enforced in the biomass sourcing area, which ensures

- the legality of harvest, trade/distribution and transport of the biomass
- forest regeneration of the harvested area
- protection of designated protected areas, including wetlands and peat bog areas

- preservation of soil quality
  - preservation of biological diversity
  - the long-term production capacity of the forest
  - at least carbon sequestration parity in the sourcing area
- ✓ ***Self-declaration for producers of forest biomass (specified-risk)***

***Specified-risk area:*** A current risk assessment, recognised by the SURE-EU system, is available for the entire biomass production area, which analyses and assesses the risk of unsustainably produced forest biomass in accordance with RED III. It is either only partially possible or completely impossible to identify a legal framework or its enforcement in the biomass sourcing area which ensures

- the legality of harvest, trade/distribution and transport of the biomass
- forest regeneration of the harvested area
- protection of designated protected areas, including wetlands and peat bog areas
- preservation of soil quality
- preservation of biological diversity
- the long-term production capacity of the forest
- at least carbon sequestration parity in the sourcing area

***No risk assessment available:*** The requirements of the SURE-EU system for the production of forest biomass and to ensure carbon sequestration parity in the biomass sourcing area are met.

### 5.3.3 Waste and residue producers

The following self-declarations are available for submission in the SURE-EU system for ***waste and residue producers***:

✓ ***Self-declaration for producers of waste and residues***

The waste and residue producer confirms by signature that the delivered material is exclusively waste or residue as defined by Revised Directive (EU) 2018/2001, that it was produced exclusively in the producer's plant and that it has not been mixed with other waste or residues.

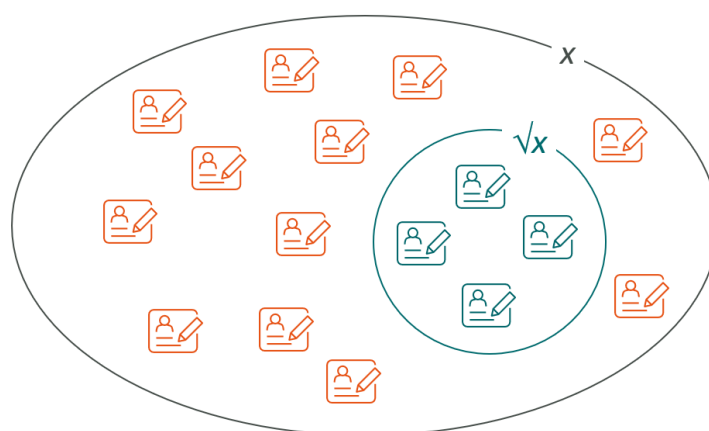
## 5.4 External neutral inspection

The group is inspected at least once a year (every 12 months) by a neutral certification body for compliance with the SURE-EU scheme requirements using the phase-specific checklists provided by SURE. The regular neutral inspection always consists of

- ✓ the auditing and certification of the group manager/main office and
- ✓ (possible sample) inspection of the group members in the case of agricultural biomass producers, or
- ✓ (possible sample) inspection of the group members in the case of forest biomass producers, or
- ✓ (possible sample) inspection of the group members in the case of producers of waste and residues of biomass.

### 5.4.1 Scope of the samples

The overall group is formed by the number of valid self-declarations submitted to the group manager and is the basis for determining the sample scope.



**Figure 3:** Scope of group members subject to sample inspections, where  $x$  = number of valid self-declarations

The scope of the group members subject to sample inspections is determined by the certification body based on risk, taking into account the following basic rules:

The minimum number of operations for sample inspections is the square root of the total number of sites ( $\sqrt{x}$ , where  $x$  is the number of operations) that have submitted a valid self-declaration rounded up to the next whole number. The number of signed self-declarations at the time the sample is determined is relevant for determining the sample. This can be increased depending on the risk status (with a minimum of 10%).

The sample scope increases if a threshold of unsuccessful inspections is exceeded.

If there is a valid certification for the first gathering point in the SURE-EU system, when changing to another SURE system (e.g. from the EU scheme to a national scheme with different criteria), the list of suppliers for the last SURE inspection forms the basis for the sample. The prerequisite in this case, however, is that the schemes build on one another.

In the case of *re-certification audits*, both of the factors mentioned above determine the scope:

- ✓ the list of suppliers from the previous inspection
- ✓ in combination with the currently available self-declarations

If the number of currently signed self-declarations is different from the number of suppliers on the list for the previous inspection, the higher number is relevant.

The scope of the inspections is based on the general risk level identified for the group:

#### ✓ **Agriculture**

Agricultural biomass producers must be inspected as follows within the scope of group certification:

- *CAP-Conditionality (= formerly cross-compliance) farms* are subject to sample inspections. (see above for scope)
- *Non CAP-conditionality (= formerly non-cross-compliance) farms* – if they are also members of a group – are subject to sample inspections.

For CAP-Conditionality and Non-CAP-Conditionality farms within a group, subgroups must be formed and inspected according to the specifications in section 4.5.

#### ✓ **Forestry**

Forest biomass producers are to be inspected within the scope of group certification depending on the risk level of the sourcing area as follows:

- low-risk areas are subject to sample inspections
- specified-risk areas must be fully inspected
- areas without a risk assessment must be fully inspected

##### *Low-risk areas*

If there is a valid and recognised risk assessment for the forest biomass sourcing area which shows a low risk of unsustainable production of forest biomass, *sample inspections* are conducted for forestry operations with a low-risk area.

Producers who are also able to document the effectiveness of sustainable forest management using objective indicators (see the SURE document “Technical guidance for the assessment of the risk of unsustainable production of forest

biomass”) must be assessed as having a lower risk in the risk-based selection of farms to be subject to sample inspections by the certification body.

#### *Specified-risk areas*

If there is a valid and recognised risk assessment for the forest biomass sourcing area which identifies a specific sustainability risk for one or more of the forest biomass producers, all forestry operations with a specified risk in their sourcing area must be inspected.

#### *Sourcing areas without risk assessment:*

If there is no risk assessment for the biomass sourcing area, **all** forestry operations producing biomass in these areas are inspected.

#### ✓ **Waste and residues**

Producers of waste and residues must be subject to sample and risk-based inspections as part of every on-site audit of the collection points.

However, they can also be certified independently in the SURE-EU system. (All downstream interfaces are always subject to certification)

Sample inspections are only possible if the contractual basis on which the producer operates prevents incentives for making false claims about the nature of the raw material and the risk of fraudulent behaviour is low. Waste producers for which sample inspections are not possible must be inspected individually.

### 5.4.2 Selection of the samples

The risk-based selection of sample inspections is determined and documented by the certification body.

The following *risk criteria* must be given special weight at a minimum (risk assessment):

- ✓ The self-declaration does not apply for the entire quantity of biomass produced by the operation.
- ✓ The operation produces sustainable and non-sustainable biomass (if the operation supplies both types of biomass).
- ✓ The biomass is cultivated on nationally or internationally recognised protected areas and is subject to special requirements.
- ✓ Size of the supplier (actual quantity supplied)
- ✓ In the case of forest biomass, proof of the effectiveness of sustainable forest management should also be taken into account in the risk-based selection of the sample using indicators (see section 4.6).

- ✓ The following factors, among others, must be taken into account in the case of biomass from *waste and residues*:
  - the type of waste and residue producer
  - the type of waste and residues (e.g. multi-feedstock, municipal waste, etc.)
  - type of GHG calculation (mainly in the case of individual calculation)

The sample must

- ✓ be representative for the entire group and
- ✓ be determined using a combination of risk and random selection (for random selection, the sample must represent a share of at least 25%).
- ✓ The operations selected for inspection should vary from year to year.

The type of sample and the underlying risks as well as their assessment must be documented.

## 5.5 Inspections of the group members

Verification that group members comply with the system requires the producers/waste and residue producers to undergo a (sample) inspection. Self-declarations from economic operators are not considered to be sufficient evidence. As part of the sample inspections carried out by the neutral certification body, the SURE-EU requirements of group members are inspected and evaluated using the phase-specific checklists provided by SURE.

The inspections are based on the plausibility and traceability of the information in the self-declaration.

It is expected that sample inspections of group members are also carried out on site (i.e. auditors visit the relevant operations).

A *desk audit* may then be allowed if it provides the same level of assurance as an on-site audit (e.g. through the availability of high-quality satellite images, data on protected areas and peatland that provide information for the relevant time frame, etc.). Certification bodies must demonstrate under which circumstances a desk audit of this kind could be considered to provide the same level of assurance as an on-site audit as part of an individual risk assessment. The risk assessment must be documented and provided to SURE upon request at any time. Group managers must be audited on site in all cases without exception.

For the risk assessment, criteria must be defined which allow the following to be determined at a minimum:

- ✓ the general risk level/potential of a region or area
- ✓ which consequences the risk level/potential has for conducting the audit
- ✓ the general risk potential of the biomass and
- ✓ what type of proof must be furnished so that desk audits are permitted (self-declarations of economic operators are not valid as adequate proof in this context).

The defined criteria as well as the proof used as a basis for an abridged external inspection must be accessible, transparent, traceable, tamper-proof, credible and trustworthy.

If the desk audit shows that the SURE-EU requirements are not satisfied or not sufficiently satisfied, the certification body must undertake further appropriate steps to check compliance (e.g. on-site audits).

### 5.5.1 Agriculture

The agricultural inspections carried out by the neutral certification body include the following:

- ✓ proven conformity with CAP-Conditionality (= formerly cross-compliance) requirements as well as the scheme principles of the SURE-EU system for the production of agricultural biomass
- ✓ the documentation of information on the farm's cropland (for example, by means of independent databases and tools)
- ✓ the traceability of agricultural biomass from the farm to the land where it is grown
- ✓ plausibility check of the harvest quantities with the land data

The documentation on the place where the biomass was grown (proof) must be kept either by the agricultural biomass producer or by the first gathering point or the group manager.

### 5.5.2 Forestry

The forestry inspections carried out by the neutral certification body include the following:

- ✓ requirements for the risk-based approach
- ✓ detailed documented information on and/or independent databases and tools for traceability to identify the forest biomass producer and his sourcing area

The documentation on the place where the biomass was grown (proof) must be kept either by the forest biomass producer or by the first gathering point or the group manager.

If a risk assessment is available, it is checked to ensure that it is plausible and complete.

For group members who have submitted a self-declaration with “low-risk”, a desk audit is also possible if

- ✓ the same depth of inspection can be guaranteed
- ✓ the security and confidentiality of electronic and electronically submitted information is guaranteed
- ✓ it is carried out by mutual consent between the auditor and the audited party

The rationale for conducting a desk audit must be documented by the certification body and presented to SURE on request.

### 5.5.3 Waste and residues

The inspections carried out of the producers by the neutral certification body include the following:

- ✓ traceability requirements
- ✓ plausible type and quantity of biomass
- ✓ documentation requirements

Evidence or documents for all individual deliveries must be available at the collection point and verified by the auditor, including waste disposal agreement, delivery slips and self-declarations.

For biomass from waste or residues – as long as it did not originate from agriculture, forestry and fishing or from aquacultures – there is no requirement to provide proof related to the land-related criteria in accordance with the Revised Directive (EU) 2018/2001.

In addition, residues and waste in Europe are subject to monitoring and inspection under the European Waste Framework Directive (EU) 2008/98. The sustainability risk of biomass fuels produced from waste and residues can therefore be regarded as low.

The frequency and intensity of the inspection procedure must reflect the overall level of risk for false declarations or fraudulent behaviour. If the risk is low, the inspection of the conformity of production plants with the requirement of the SURE-EU system can be carried out as a *desk audit* due to the low sustainability risk and replace on-site inspections if

- ✓ they are conducted with the same level of reliability and accuracy
- ✓ the same depth of inspection can be guaranteed
- ✓ the security and confidentiality of electronic and electronically submitted information is guaranteed

- ✓ it is carried out by mutual consent between the auditor and the producer to be inspected

*Producers who deliver significant quantities of biomass from waste and residues to collection points must be inspected on site.*

It is at the discretion of the certification body to decide, following a risk-based approach, which quantities are to be classified as significant for which type of waste and residues (the monthly supply of one tonne of used cooking oil from a restaurant must be assessed differently than the monthly supply of one tonne of waste wood from a demolition company) and whether the producers that supply biomass from waste and residues to a collection point are to be inspected on site or as a desk audit.

The underlying risks as well as their evaluation for a decision in favour of a desktop audit must be documented by the certification body.

## 5.6 Threshold values for a failed inspection

### 5.6.1 Exclusion and extension of the sample

Whenever a group member fails the inspection due to one or more critical non-conformities (KO), or due to non-fulfilment of the requirements (inspection result < 75 %), this group member must be excluded from the group immediately.

In order to guarantee the original size of the sample, additional group member(s) must be included in the inspection. This increases the total number of group members inspected to  $\sqrt{x} \times x + n$ , where  $n$  is the number of group members where a critical non-conformity (KO) was detected. The risk-based sampling criteria continue to apply when selecting these additional group members.

### 5.6.2 Doubling the scope of inspection

A doubling of the inspection sample (to  $2 \times \sqrt{x} \times x + n$ , where  $x$  is the number of group members from the original sample and  $n$  is the number of group members in which a critical non-conformity (KO) was detected) is required if at least one of the following cases occur:

- 1) 1. more than one third of the inspected group members are excluded from the group ( $n \geq 1/3 \times x$ ) because they do not fulfil the system requirements (inspection result < 75 %).
- 2) at least one critical non-conformity (KO) was detected in the inspected group member.

If cases 1) and/or 2) apply and lead to the exclusion of more than one third of the group members inspected, the sample must be doubled in accordance with the above rule.

If at least  $\frac{1}{3}$  of the inspected group members from the second sample that do not fulfil the scheme requirements (inspection result <75%) are found to have one or more critical non-conformities (KO) the size of the inspections must be doubled again. In an extreme case, this can continue until all group members that belong to this group manager have been inspected (inspection density of up to 100%). Systemic non-compliance of the majority of group members (>50%) across the whole sample will lead to the suspension or withdrawal of certification for the entire group as applicable.

The first gathering point and/or group manager will be notified of any major / critical non-compliance.

Group members removed from the group as a result of critical non-conformities (KO) must be recorded by the group manager in an appropriate manner and must be reported to the certification body as part of the re-certification process. These companies must be clearly labelled on the list of group members with a valid self-declaration. This list must be made available to the certification body without request.

Only operations that satisfy the scheme requirements (inspection result > 75%) may supply biomass certified as “sustainable”.

Other operations may not be part of the group and, as long as they are excluded or suspended from the group, may not supply biomass that is certified as “sustainable”. These include:

- ✓ Group members found to have a major non-compliance. They will be suspended and excluded from the group and from SURE certification.

Group members who have been excluded due to suspension may be reinstated if they have remedied the identified non-conformities within 90 days when they are identified and have documented them in a follow-up inspection. If the scheme non-conformities cannot be documented as corrected within 90 days of when they are identified, the group member is excluded from the group and SURE certification withdrawn.

- ✓ Group members found to have a critical non-compliance must be immediately excluded from the group and SURE certification withdrawn.

Group members who have been excluded can only rejoin the SURE-EU system if they have successfully passed a follow-up inspection and are able to document a successful follow-up inspection, for example in the form of an inspection certificate, for the next re-certification of the group manager. A valid and consistent self-declaration must be submitted beforehand.

If a group member has been excluded from a group, it is obliged to disclose this when submitting another self-declaration to a different group manager.

Different group managers can refuse to accept a corresponding self-declaration for a period of at least two years.

The number of group members may be limited by the certification body within the scope of the risk-based certification approach (e.g. based on audit/inspection results or the overall performance of the group).

## 5.7 Issue of certificates

A certificate for the group manager can only be issued if the inspections of the upstream storage/operating sites have also been successfully completed.

The certificate issued to the group manager is valid for the entire group.

The successfully inspected group member who meets the requirements of the Revised Directive (EU) 2018/2001, but is not itself an interface or scheme participant, receives an inspection certificate upon request.

In addition, the requirements from section 5.3.2 apply.

# 6 Requirements and responsibilities of certification bodies

The neutral monitoring and certification of operations in the SURE-EU system is carried out by neutral certification bodies. The certification bodies are natural or legal entities that check compliance with the requirements of the Revised Directive (EU) 2018/2001 along the production and supply chain. Operations can freely choose which certification body they want to work with. All certification bodies that participate in certification in the SURE-EU system have to fulfil the requirements below.

## 6.1 Requirements for certification bodies

### 6.1.1 Recognition by a national authority or accreditation body

A certification body performing audits on behalf of a voluntary scheme must be accredited to ISO 17065, and to ISO 14065 where it performs audits on actual GHG values.

In addition, certification bodies must also be - as a prerequisite

- ✓ accredited by a national accreditation body and in accordance with Regulation (EC) No 765/2008, or for the scope of the Revised Directive (EU) 2018/2001, or the specific scope of SURE.
- ✓ recognised and supervised by a competent authority for the scope of the Revised Directive (EU) 2018/2001, or the specific scope of SURE.

SURE reserves the right to require further proof of accreditation for the approval of certification bodies in the SURE-EU system.

The certification body is required to immediately notify SURE of any changes in its company activities that concern the prerequisites for acting as a certification body. This applies in particular to the suspension/revocation of accreditation and/or recognition by a competent authority as specified above.

The certification bodies conduct their audits in accordance with the requirements in ISO 19011 (prerequisite for accreditation).

### 6.1.2 Registration by SURE and contract conclusion

The certification body submits an application for registration with SURE. The certification body must already be able to carry out audits when the application is submitted. At least two qualified auditors must be registered at the time of registration. When the application form of the potential Certification Body and/or auditor candidate is completely filled out and all required documents have been submitted, SURE decides whether to approve or reject the application and informs the applicant of the decision in writing.

SURE accepts applications for registration as a SURE certification body and as a SURE auditor and the appropriate supporting documentation in English or German only.

Approval by SURE is granted by concluding a written legally binding contract, which is drawn up by SURE. The certification body is only authorised to carry out audits and issue certificates under the SURE-EU voluntary scheme after the signed contract has been received and all other requirements necessary for accreditation (e.g. internal and external training) have been implemented.

In the further course, the registered certification body creates in the SURE database the auditor profile of the auditor registered by SURE with the confirmed scopes. SURE will check the information entered by the certification bodies and, if the result is positive, will confirm it in the database in the next step after any conditions imposed have been fulfilled. After

confirmation by SURE, the status of the auditor changes from "registered" to "confirmed". Only at this point the auditor is authorized to perform audits in the SURE-EU system.

### 6.1.3 QM system and documentation

The certification bodies must have a documentation management system that addresses each of the following elements

- ✓ general management system documentation (e.g. manuals, policies, definition of responsibilities)
- ✓ control of documents and records
- ✓ management review of management systems
- ✓ internal auditing/internal monitoring
- ✓ procedures for identification and management of non-conformities
- ✓ procedures for taking preventive actions to eliminate the causes of potential non-conformities

### 6.1.4 Independence and impartiality

Certification bodies shall set up integrity rules and procedures to ensure their full independence from the economic operators participating in the scheme.

Persons having a potential conflict of interest shall be excluded from decision-making in the certification body.

Evaluations and decisions may not be affected by personal relationships, financial incentives or other types of influences.

The certification bodies and the auditors are independent of the interfaces, operations and suppliers and free of all conflicts of interest and can furnish proof of this.

The certification body shall require personnel involved in the certification process to sign a contract or other document by which they commit themselves to the following:

- a) to comply with the rules defined by the certification body, including those relating to confidentiality and independence from commercial and other interests;
- b) to declare any prior and/or present association on their own part, or on the part of their employer, with:
  - a supplier or designer of products, or

- a provider or developer of services, or
  - an operator or developer of processes
- to the evaluation or certification of which they are to be assigned;
- c) to reveal any situation known to them that may present them or the certification body with a conflict of interest.

The following is a non-exhaustive list of examples to be used in the analysis to determine the impartiality of assigned personnel:

- ✓ not being involved simultaneously in consultancy and audit with the same economic operator in the past 3 years
- ✓ previous relationships should be assessed on a case-by-case basis
- ✓ financial/ business/family relationship.

Although irrespective of the above mentioned, the person may not be assigned to these tasks if the potential still exists for any other conflicts of interest. Certification bodies shall use the above mentioned as a minimum information as input into identifying risks to impartiality raised by the activities of such personnel, or by the organizations that employ them.

### 6.1.5 Technical and staffing requirements

The certification bodies have the respective equipment and infrastructure to review compliance with the scheme requirements and the requirements of the Revised Directive (EU) 2018/2001 for all participants in the value chain. The certification bodies have sufficient qualified staff which fulfils the requirements listed under section 7. The verification that these prerequisites are fulfilled must be provided by presenting suitable documents on the equipment of the respective certification body, its structure and its staff.

### 6.1.6 Principle of peer review

To ensure that the principle of peer review is upheld (separation of evaluation and certification), the certification body employs at least two persons. The certification decision may not be made by the same person who carried out the audit, is part of the audit or who has a potential conflict of interest. The certification body also appoints a person who has in-depth scheme knowledge and is responsible for communication with SURE.

### 6.1.7 Handling complaints and claims

The certification bodies must have an effective process in place for handling complaints and claims. This process is part of the QM system of the respective certification body and ensures that the fastest possible response is given in the event of complaints and claims and that corrective measures are introduced if necessary.

### 6.1.8 Selection and appointment of an audit team

The certification body must have a defined procedure for the selection and appointment of the audit team, taking into account the competencies required to achieve the objectives of the audit and the areas of activity approved by SURE. The audit team must have the appropriate competencies required to conduct the audit to ensure compliance with the criteria of the SURE-EU system and in accordance with the audit scope. If there is only one auditor, the auditor must have the competencies to perform the duties of a lead auditor. If necessary, the audit team can also be supplemented by technical experts who work under the supervision of an auditor.

### 6.1.9 Auditor rotation

To ensure the highest possible level of independence of the auditors' judgement the certification body must follow the principles of auditors' rotation. To ensure auditor rotation there must be at least two active auditors that are registered and confirmed by SURE to achieve the audit objectives.

After undertaking of 3 consecutive SURE-EU audits of the same economic operator by the same lead auditor - in case of audit teams - or auditor, a new lead auditor or auditor has to be assigned through the certification body.

The following types of audits are counted:

- ✓ Initial and
- ✓ Re-certification audits

Should an alternative (lead) auditor not be available, an exemption can be made by the certification body and the period can be extended for a maximum of one extra audit.

Any exception to the 3- audits auditors rotation rule has to be duly justified and submitted to SURE for validation before the respective audit takes place.

## 6.2 Invalidating approval

The approval of a certification body becomes invalid if it is withdrawn or if it expires or ends some other way.

## 6.3 Responsibilities of certification bodies

Certification bodies that perform audits under the SURE voluntary scheme are responsible for the following:

### 6.3.1 Risk management

With its risk management, the certification body ensures that all operations and operating sites under the SURE-EU system are inspected at sufficient intervals and with adequate intensity. This is intended to ensure the greatest possible reliability in the implementation of the requirements of the Revised Directive (EU) 2018/2001 and the requirements of the SURE-EU voluntary scheme.

### 6.3.2 Performing audits and issuing certificates and inspection certificates

The certification bodies have to prove implementation of a documented process that governs the certification process and the issuance of certificates and inspection certificates under the voluntary SURE-EU scheme. The general requirements of the audit process are specified by the ISO 19011 standard. Audits must be properly planned, conducted and documented. This generally means that the auditor

- ✓ identifies the activities undertaken by the economic operator that are relevant to the scheme requirements
- ✓ identifies the relevant schemes of the economic operator and their overall organisation with respect to the scheme requirements and checks the effective implementation of relevant control systems
- ✓ establishes at least a “limited assurance level”<sup>3</sup> in the nature and complexity of the economic operator’s activities
- ✓ analyses the risks that could lead to a material misstatement based on the auditor’s professional knowledge and the information submitted by the economic operator
- ✓ draws up an audit plan which corresponds to the risk analysis and the scope and complexity of the economic operator’s activities, and that defines the sampling methods to be used for the operator’s activities

- ✓ implements the audit plan by gathering evidence in accordance with the defined sampling methods plus all other relevant proof that the verifier will base his conclusion on
- ✓ requests that the economic operator provide any missing elements of audits, explain variations, or revise claims or calculations before reaching a final verification conclusion<sup>4</sup>

The certificate issued to the interface is a certificate of conformity. Interfaces are issued a certificate when they fulfil the scheme's requirements. Economic operators that fulfil the requirements of the Revised Directive (EU) 2018/2001 but are not themselves interfaces are issued an inspection certificate after the successful inspection upon request.

Certificates and inspection certificates can only be issued after a positive on-site inspection. The certificate or inspection certificate templates provided by SURE must be used.

### 6.3.3 Managing interface directories

The certification bodies have to keep a list of all economic operators that they have issued certificates and inspection certificates to. The list has to include at a minimum their name and address as well the unique registration number of the interface, the relevant copies of the certificates and/or the audit reports. The security of the data must be guaranteed. The data must be stored transparently and be up-to-date.

### 6.3.4 Storing and handling information

Certification bodies have to keep the results of audits and copies of all certificates that they issue under the voluntary SURE-EU scheme for at least 5 years or longer if required by law respectively the relevant national authority. The audit reports are provided solely to the company and SURE. If a scheme participant switches to a different approved certification body, the first certification body is required to provide the new certification body with the required data. The certification bodies are required to document the results of the conformity evaluation in such a way that it is possible at any time for SURE to check the results and records. In addition, it must guarantee that storage is secure, complete and transparent.

### 6.3.5 External and internal training for auditors

The certification bodies are responsible for implementing external and internal training for auditors. SURE supports this qualification and further training of auditors through an annual mandatory event for certification bodies. In addition, SURE offers regular information and

training events as well as newsletters and communications on current issues and developments for certification bodies and auditors. It is the responsibility of the certification body to appoint a contact person who disseminates this information in internal training sessions.

### 6.3.6 Participation in monitoring activities of the member states and the European Commission

Certification bodies that conduct audits under the SURE system must cooperate with the European Commission and the competent authorities of the Member States. For those purposes, certification bodies must:

- a) provide the information needed by member states to supervise the operation of certification bodies pursuant to Article 30(8) to (10) of the Revised Directive (EU) 2018/2001 as well as article 17 of Implementing Regulation (EU) 2022/996
- b) verify the accuracy and completeness of information entered into the Union database or relevant national database pursuant to Article 31a(5) of the Revised Directive (EU) 2018/2001

This includes:

- ✓ upon request of the competent authorities, the submission of all relevant information necessary to supervise the operation, including the exact date, time and location of audits, audit reports and greenhouse gas calculations,
- ✓ upon request of the European Commission, the submission of all relevant data to examine whether the sustainability and greenhouse gas emissions saving criteria in relation to a particular consignment are met,
- ✓ the granting of access to the premises of economic operators where requested,
- ✓ making available to the Commission and the competent authorities of the member states all further information needed to fulfil their tasks under the Revised Directive (EU) 2018/2001.

## 6.4 Transfer of certification bodies

SURE-EU participants are free to decide which SURE-registered certification body (see published list of SURE-registered certification bodies) is commissioned to carry out the SURE-EU certification procedure.

SURE-EU participants may also transfer from one certification body to another certification body.

As part of its application process, the certification body taking over the potential new customer checks in a documented *pre-transfer review*:

- ✓ the activities
- ✓ the status of the certificate
- ✓ the status of any non-conformities found in previous audit(s)
- ✓ whether there are any complaints
- ✓ the last audit report
- ✓ the corresponding risk-assessment of the last certification audit
- ✓ and all other information relevant to SURE-EU certification procedure

The audit procedures and documents from the previous audit and all other information relevant must be considered during the re-certification process performed by the newly contracted certification body.

In addition to the decision to accept the SURE-EU participant as a new customer, the documented *pre-transfer review* of the overtaking certification body also includes how the transfer should take place. Either via a transfer-check including the issuance of a certificate for the remaining term or an early re-certification with issuance of a certificate with a maximum validity of 12 months in both cases assuming a positive certification decision.

One certification body must not take over certificates issued by another certification body under their name without prior transfer-check and/or auditing. There are various reasons for a change of certification body, but there must never be a certificate without a responsible certification body.

Once the decision has been made to take over the SURE-EU participant, the overtaking certification body declares legally binding towards SURE the responsibility for the upcoming SURE-EU certification procedure(s).

The old certification body must inform SURE of the termination of contract / the withdrawal of the legally binding declaration.

The old and newly contracted certification bodies agree on a *transfer date* and inform SURE of this date. On the agreed transfer date,

- ✓ the old certification body withdraws the valid certificate, if applicable
- ✓ SURE connects the new certification body and SURE-EU participant technically and
- ✓ the new certification body uploads the certification information into the database.

*The SURE-EU participants must not be disadvantaged by a change of certification body. To ensure this the old and newly contracted certification bodies must cooperate with each other.*

Specific requirements regarding the system integrity must be met to reduce the risk of changing certification bodies intending to cover up infringements or violations of the SURE-EU requirements.

In case a SURE-EU participant changes certification bodies twice or more within 3 years, the newly contracted certification body with the second change must apply a higher risk level for the next planned audit. It is the responsibility of the newly contracted certification body to take this requirement into account when conducting the risk assessment, as well as considering the certification history of the SURE-EU participant and the relevant audit documents from the previous audit(s).

## 7 Requirements of SURE auditors

The appointed auditors must

- ✓ be independent of the activity being audited, except for audits concerning Article 29(6), point (a), and Article 29(7), point (a) of the Revised Directive (EU) 2018/2001, for which first or second party auditing may be carried out up to the first gathering point
- ✓ be free from conflict of interest

The auditors must be identified to SURE by name and they must provide written evidence that they fulfil the requirements below. CVs together with references, confirmations and/or other relevant documents can serve as evidence of sufficient expertise, professional experience and experience as an auditor of a certification body. These must be documented by the respective certification body, updated and provided to SURE upon request. SURE is authorised, particularly in the case of missing documents or insufficient qualification of the auditors, to reject the application for approval or to withdraw an existing approval.

### 7.1 Training and qualification

The auditors must have the special knowledge necessary to conduct the audits related to the scheme criteria and the aspect of the scheme being audited.

### 7.1.1 Land use criteria

Auditors conducting audits for the land use criteria set out in Article 29(2) to (9) of the Revised Directive (EU) 2018/2001 must

- ✓ provide proof of experience in agriculture, agronomy, ecology, natural science, forestry, silviculture or a related field, including specific technical skills needed to verify compliance with the highly biodiverse grasslands and highly biodiverse forest criteria.

### 7.1.2 Knowledge of GHG balancing

All auditors involved in GHG-related inspections must demonstrate appropriate experience in GHG accounting (especially special knowledge of the GHG accounting methodology as per Revised Directive (EU) 2018/2001, for short: RED III). Knowledge of GHG accounting can be acquired, for example, through training in the areas of process, energy and environmental technology, environmental engineering, environmental quality management, environmental process technology, regenerative energies, energy and environmental system technology and energy technology as well as special GHG training courses (including the RED III-GHG accounting methodology). Appropriate proof of the technical and professional expertise acquired in GHG accounting within the scope of the chosen training course must be provided.

At least 2 years' of experience in fuel life-cycle assessment, and specific experience in auditing GHG emission calculations in accordance with using the REDII/REDIII calculation methodology. Relevant experience depending on the type of audits to be carried out by the individual auditor.

Where the scope of the audit includes verifying soil organic carbon levels, for the purpose of applying the emission saving credit for soil carbon accumulation ( $e_{sca}$ ), technical knowledge (e.g. soil science) is also required.

Auditors who wish to verify GHG calculations based on actual calculations or verify soil carbon accumulation ( $e_{sca}$ ) must demonstrate an ISO 14065 vocation.

### 7.1.3 Farms

Auditors who perform audits of farms must have competencies in at least the following areas:

#### ***a) Knowledge of handling data sources and the analysis of geographic data***

Completed training and education in the areas of agricultural sciences, geography, geographic sciences, geoinformatics, geoscience and environmental sciences can be supplied as proof of knowledge in how to deal with data sources such as, e.g. map

material, GPS data, GIS data, satellite images. Appropriate proof of the technical and professional expertise acquired to analyse geographic data and handle data sources within the scope of the chosen training course must be provided.

**b) *Soil knowledge***

The required soil knowledge for peatland identification, the assessment of the degraded areas or for further proof of soil-related requirement criteria of the Revised Directive (EU) 2018/2001 can be documented by, e.g. training and education in the areas of agricultural sciences, soil science, geological sciences, geoecology, landscape ecology, environmental sciences. Appropriate proof of the technical and professional expertise acquired in soil evaluation within the scope of the chosen training course must be provided.

**c) *Biological and ecological knowledge***

The required knowledge on species and biotope types (e.g. types of grasslands, wetlands) native tree species and identification of the canopy cover can be documented by, e.g. completed training and education in the areas of biology, botany, ecology, forestry, landscape ecology, environmental sciences, provided that the technical and professional expertise can be demonstrated as part of the selected training path.

Demonstrating compliance with the criterion "high biodiversity grassland" or "forests with high biodiversity and other wooded areas that is species-rich and not degraded" requires technical knowledge that goes beyond the competencies that can be expected of auditors who verify the accuracy of the information provided by economic operators (e.g. assessing whether grassland or wooded land maintains its natural species composition, ecological properties and processes and whether it is species-rich, whether harvesting of the raw material is necessary to preserve the highly biodiverse grassland status, whether management practices do not present a risk of causing biodiversity decline of the grassland).

The assessment of whether grassland or forest and wooded areas maintain their natural species composition, ecological properties and processes and whether they are species-rich can be carried out, for example, by professionally experienced experts who have acquired a special qualification for this purpose (e.g. in biology, ecology, botany, plant sociology, grassland science, forest sciences, site assessment, ecosystems, site mapping or similar). These experts must be external specialists who have no connection to the activity being inspected and may not have any conflicts of interest. It is the experts' responsibility to determine whether a certain piece of land is highly biodiverse or was highly biodiverse when converted on a case-by-case basis. This evaluation must be undertaken every year. It is often sufficient for this to occur once, for example when grassland has been converted into farmland for the cultivation of raw materials.

In terms of the neutral inspection, this means that prudence and care must be exercised in determining the potential biodiversity of grassland or wooded and forested areas: The auditor must assess whether an evaluation of grassland or forest or wooded areas of high biodiversity is necessary or whether the result of the evaluation is consistent with the information provided by the producer and whether the expert who carried out the evaluation has taken all requirements into account.<sup>5</sup>

If “an evaluation is necessary”, it must be carried out by an independent expert who can be consulted in addition to the “auditor”. The evaluation and the result must then be checked as part of the audit.

#### 7.1.4 Forestry operations

Auditors who perform inspections of forestry operations must have competencies in at least the following areas:

**a) *Knowledge of handling data sources and the analysis of geographic data***

Completed training and education in the areas of forest sciences, geography, geographic sciences, geoinformatics, geoscience and environmental sciences are proof of knowledge in how to deal with spatial data sources such as, e.g. map material, GPS data, GIS data, satellite images. Appropriate proof of the technical and professional expertise acquired to analyse geographic data and handle data sources within the scope of the chosen training course must be provided.

**b) *Silvicultural knowledge***

The evaluation of whether the harvesting of forest biomass in the area of origin is legal, whether specially designated areas such as nature reserves are protected, or whether the requirements for land use, land use change and forestry (LULUCF) are met, requires expertise in the relevant legislation and the regulatory framework, which can be obtained through training in forestry, timber industry, forest sciences, environmental science, environmental law, landscape and nature conservation or comparable training courses. Relevant proof of technical and professional expertise must be provided.

The silvicultural knowledge needed to assess forest renewal and regeneration, the effect of harvesting activities on soil quality, biodiversity, the long-term production capacity of the forest and the level of carbon stocks and sinks in the production area can be acquired through training in forest sciences and forestry or similar subjects. Proof of technical and professional expertise in the relevant field must be provided.

**c) *Assessment of the risk of the use of forest biomass produced unsustainably***

The assessment of the risk that the forest biomass has been produced unsustainably in accordance with the requirements of the Revised Directive (EU) 2018/2001 Article 29(6) and (7) requires expertise in the relevant legislation and the regulatory framework in the production area, which can be obtained through training in forestry, forest-based industries, forest sciences, environmental sciences, environmental law, landscape and nature conservation or comparable training courses. Relevant proof of technical and professional expertise must be provided.

**d) *Assessment of the biological diversity***

Any required knowledge on species and biotope types, native tree species, etc. can be documented by, e.g. completed training and education in the areas of biology, botany, ecology, forestry, landscape ecology, environmental sciences, provided that the technical and professional expertise can be demonstrated as part of the selected training path.

The actual assessment of the effect of harvesting on biodiversity in the sourcing area as part of an audit requires technical knowledge that goes beyond the competencies that can be expected of auditors who verify the accuracy of the information provided by economic operators (e.g. assessing whether the forest's natural species composition or its ecological properties and processes are significantly affected by the harvesting activity). This assessment can therefore be carried out, for example, by professionally experienced experts who have acquired a special qualification for this purpose (e.g. in biology, ecology, botany, plant sociology, forest sciences, site assessment, ecosystems, site mapping or similar). These experts must be external specialists who have no connection to the activity being inspected and may not have any conflicts of interest. It is the expert's job to determine on a case-by-case basis whether the harvesting activity has an adverse effect on the biodiversity of the production area.

In terms of the neutral inspection, this means that prudence and care must be exercised in determining the potential biodiversity of forests and their potential change: The auditor must determine whether a separate assessment of the forest with regard to its biodiversity is necessary or whether the result of the assessment is consistent with the information provided by the producer and whether the expert who carried out the assessment took all requirements into account.<sup>6</sup>

If "an evaluation is necessary", it must be carried out by an independent expert who can be consulted in addition to the "auditor". The evaluation and the result must then be checked as part of the audit.

### 7.1.5 Residues and waste

Auditors who perform inspections of producers/suppliers of residues and waste must have expertise in at least the following areas:

#### ***a) Knowledge of handling data sources and registers***

Proof of knowledge in handling waste data such as weighing data, register for non-hazardous waste, register for hazardous waste (electronic verification procedure) is, for example, completed training in waste management or training in agricultural sciences, civil engineering or environmental sciences in connection with a proven waste management activity.

#### ***b) Knowledge of waste management***

Appropriate expertise is required for the necessary assessment of waste and residues. The expertise requires at least knowledge of the legal basis for handling biomass from waste and residues (particularly waste and permit law and waste declaration), as well as operational implementation and application.

Proof of expertise can be provided as part of an initial training plan or through successful participation in a relevant course or through training in the fields of waste management, agricultural sciences, civil engineering or environmental sciences in connection with a proven waste management activity.

### 7.1.6 Interfaces, storage sites and suppliers

Auditors who perform audits of interfaces, storage sites and suppliers must have experience in mass balancing systems, traceability and data handling. Proof of the required knowledge can be provided by e.g. completed studies at a university or a technical college or a comparable qualification in the areas process technology, energy management, environmental engineering, environmental and quality management, environmental orientated process engineering and renewable energy.

### 7.1.7 Groups

In addition to the above-mentioned scope or technical knowledge, SURE expects auditors who audit groups to have experience in conducting group audits in the form of at least 2 conducted group audits within the last 24 months prior to the date of application for approval of an auditor.

## 7.2 Required knowledge, professional and practical experience as an auditor

<b>Technical expertise</b>	Audit technique, communication skills, extensive knowledge of the legal requirements in the relevant area and of the SURE-EU scheme requirements
<b>Required qualification as an auditor</b>	Training (e.g. in accordance with ISO 19011) Duration: at least 24 hours (3 days)
<b>Professional experience</b>	At least 4 years of professional experience in the area applied for in a relevant position
<b>Practical experience as an auditor</b>	At least 5 third party audits in the last 2 years in the area applied for (e.g. PEFC, ISCC, SBP, REDcert, ISO, FSC, EfbV, EMAS), of which at least 2 group audits if group audits are planned

**Table 3:** Required skills of a SURE auditor

### 7.2.1 Training and performance assessment for staff of certification bodies

The staff of a certification body in the SURE-EU system must be trained before they can commence their activities in the scheme. This is done in the SURE system through the train-the-trainer principle.

SURE conducts these training for individuals responsible for implementing the certification body's train-the-trainer principle.

However, this requires that the people responsible and certification bodies have successfully participated in the training courses offered by SURE in keeping with the train-the-trainer principle. Part of the train-the-trainer courses held by SURE is an exam to determine whether the training has been successful

All training and performance assessments of the qualified people responsible and certification bodies are documented.

The training certificate (type, duration, location and main contents of the training) may only be provided by the training organisation if the trainee is present for the entire duration of the course.

When new auditors apply, they must provide the training certificate.

### 7.2.1.1 Initial training before starting work

Auditor candidates performing RED III activities for the first time must demonstrate the required skills and expertise acquired through education and training in an exam before being approved as an auditor under the SURE-EU scheme.

An overview of the initial training and the different exam requirements for certification staff is provided in the training matrix below.

Certification staff	Initial training	Mandatory performance assessment
		Exam
Auditor candidates	X	X
Staff of the certification body <sup>1</sup>	X	-

**Table 4:** Overview of the initial training and the different exam requirements

<sup>1</sup> to the extent they are involved in the implementation of certification procedures under the SURE-EU system

The qualification of auditors who can provide evidence that they have already carried out audits under a voluntary system recognised by the European Commission with a scope equivalent to the SURE scheme, e.g. REDcert is considered to be sufficiently proven by thorough monitoring by voluntary scheme and the competent authorities. Another exam to demonstrate qualifications is therefore not required in the SURE-EU system.

In addition, certification bodies have the freedom to conduct an audit on a voluntary basis for staff members of the certification body who do not work as auditors.

### 7.2.1.2 Further training to maintain a high level of expertise

Once approved, auditors are required to attend training courses for the SURE-EU system on a regular basis – at least once a year. The training is either conducted by SURE or, after agreement on content and scope, by qualified individuals responsible for implementing the certification body's train-the-trainer principle who have passed a successful SURE train-the-trainer course.

The certification body is required to ensure that the certification staff maintains a high level of expertise about the voluntary system through regular training.

The training requirements and training content arise, among other things, from adjustments to the voluntary system as a result of the following changes:

- ✓ Changes in the legal framework
- ✓ Clarifications or notifications from the EU Commission

- ✓ findings from the annual harmonisation meeting of the certification bodies
- ✓ corrective and/or improvement measures as a result of complaints or assessments by the accrediting body

The certification body is responsible for the organisation, implementation and review of the further training measures. SURE can also provide and conduct additional training.

SURE immediately informs the certification bodies by newsletter, e-mail and other means of communication about changes and other relevant developments in the scheme. SURE reserves the right to request documentation on participants, content, duration and performance assessment from the qualified people responsible and certification bodies.

The topics covered in training include the following areas at a minimum:

- ✓ content of the relevant legislation
- ✓ content of the scheme documentation in the SURE-EU system
- ✓ review of the knowledge gained as performance assessment
- ✓ content and handling of the SURE-EU checklists for neutral inspections
- ✓ requirements for verifying criteria
- ✓ reporting requirements to SURE
- ✓ practical questions about audits and the SURE-EU system
- ✓ harmonisation of assessment practices to guarantee consensus

### 7.2.2 Carrying out initial exams

The scope and content of the mandatory initial exams are defined by SURE. The initial exams are organised and conducted by a trainer who has been successfully trained by SURE through the certification body. In exceptional cases, the exam can also be carried out online once this is confirmed by SURE. The certification body informs SURE well in advance of the date of the exam and the names of the people who will take the exam.

Since the training is organised and held in-house, certification bodies can manage exams flexibly and cost-effectively in line with requirements.

The exam questions must be answered by the person taking the exam within a certain period of time. The exam ends without exception after the specified period time has elapsed. The exam documents are then evaluated by SURE.

The scope and content of the mandatory initial exams are defined by SURE.

### 7.2.3 Monitoring the exam process

Under the scope of internal monitoring, SURE must ensure that

- ✓ the requirements for content and time period are satisfied, and
- ✓ any misconduct (in particular disruptions and attempts at fraud, ban on recordings of any kind)

has consequences, for example by having a representative from SURE accompany the online exams.

The certification body must confirm that the exam has been properly carried out with the signature of the trainer.

## 8 Registration

The figure below illustrates simplified the registration processes for the certification bodies and the auditors. Please see sections 6 “Requirements and responsibilities of certification bodies” and 7 “Requirements of SURE Auditors” for information about the skills necessary for successful registration. Please see section 7.1 “Relevant documents” for information on the documents required for registration.

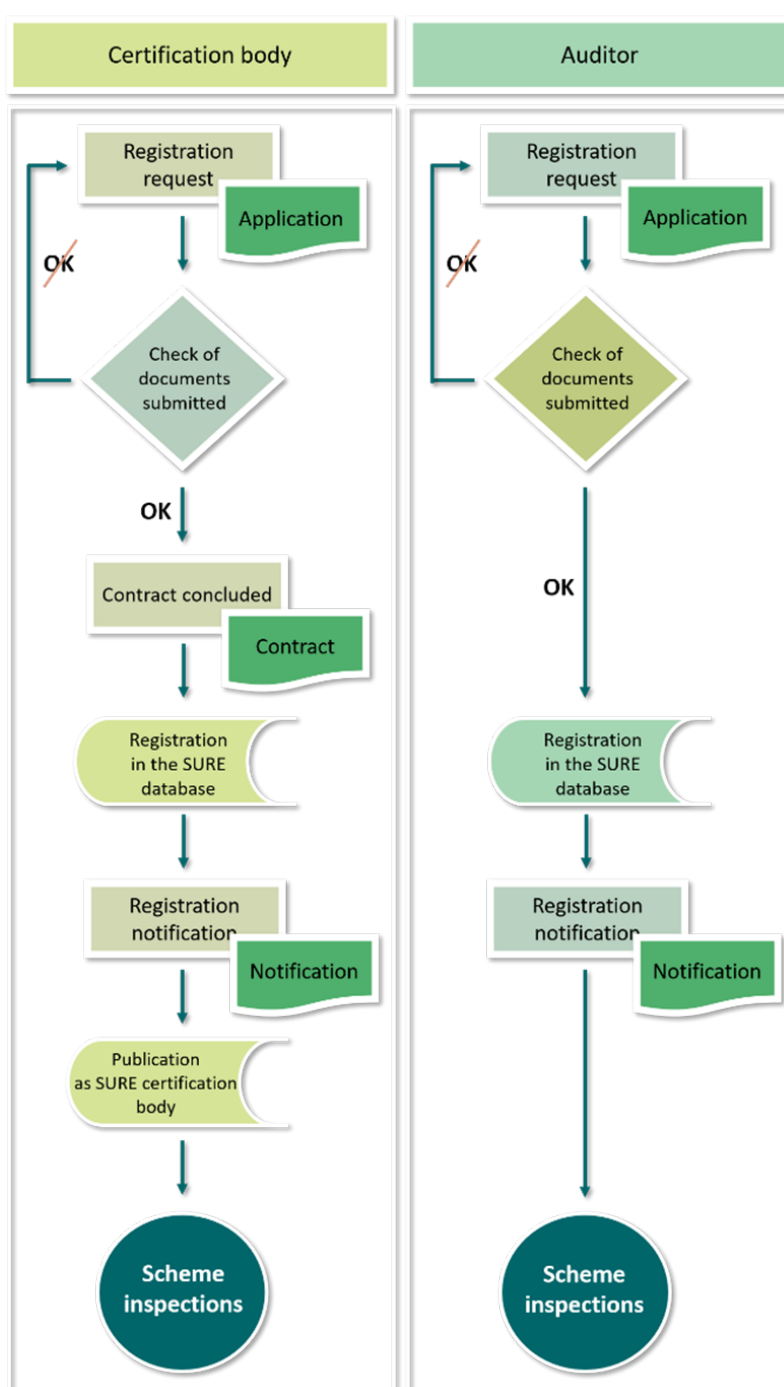


Figure 4: SURE registration processes for certification bodies and auditors

## 8.1 Relevant documents

### 8.1.1 Registering a scheme participant

Please see the SURE document “Scope and basic scheme requirements” for information on registering the scheme participant.

### 8.1.2 Registering a certification body

The following documents are distributed upon request or after completing the respective *SURE registration process in English or German*:

#### **a) Application for registration of a certification body in the SURE-EU system**

The application includes questions in compressed form about information on what is expected from SURE certification bodies formulated under section 6 “Requirements and responsibilities of certification bodies”. It is to be sent by the certification body submitting the application together with the sample documentation listed here to SURE in electronic format. Application and documentation are subject to a review process at SURE. If the information submitted by the certification body does not fulfil the SURE requirements, the registration process is interrupted to clarify any questions. If the information submitted by the certification body meets the requirements, SURE sends the master agreement to the certification body.

#### **b) Master agreement for neutral inspections in the SURE-EU system**

The master agreement governs the prerequisites for certification bodies in the SURE-EU system and the certification procedures for SURE scheme participants. When this contract is signed, the certification body is registered in the SURE database (access-restricted area of the SURE certification portal). The data registered here must be kept up-to-date by the certification body. SURE must be informed if this information changes.

#### **c) Notification of certification body registration in the SURE-EU system**

With the registration notification, SURE sends all of the documents and information necessary for SURE certification to the certification body.

#### **d) Confirmation of participation in the SURE train-the-trainer training**

SURE conducts train-the-trainer training sessions for the certification bodies. Here those responsible for the train-the-trainer principle in a certification body are given extensive information that makes it possible for the certification bodies to begin their certification activities under the SURE-EU system. Participation in a train-the-trainer training session is mandatory before the certification body begins its

certification activities. Training is documented by a participation certificate from SURE that SURE keeps on file.

### 8.1.3 Registering an auditor

The following documents are distributed upon request or after completing the respective SURE registration process:

#### ***a) Application for registration of an auditor in the SURE-EU system***

The application includes in compressed form the request for information on the SURE requirements outlined in section 7 “Requirements of SURE ” for the qualification of auditors deployed for certifications under SURE. It is to be sent by the certification body submitting the application together with the sample documentation listed here to SURE in electronic format. Application and documentation are subject to a review process at SURE. If the information submitted does not meet the qualifications required by SURE, the registration process is interrupted to clarify any questions. If the information submitted meets the qualifications required by SURE, SURE sends a notification of registration of an auditor including the scope registered for the auditor in the SURE-EU system.

#### ***b) Notification of registration of an auditor in the SURE-EU system***

When this registration notification is sent, the auditor is recognised by SURE and registered in the SURE database (access-restricted area of the SURE certification portal). SURE must be informed of any changes affecting the registered auditor in question.

#### ***c) Expanding the auditor's scope***

Registered auditors also need SURE's consent to expand their scope of audits. For this purpose, the responsible certification body submits an application to SURE including relevant documents and proof of the qualification/skills of the auditor in question.

## 9 SURE integrity and quality assurance measures

SURE undertakes a number of measures to monitor scheme integrity and guarantee the quality of audits as well as compliance with the scheme requirements. These include both preventative measures to assure the defined quality requirements as well as monitoring measures that reflect the degree of fulfilment and serve as a basis for the continued further

development and improvement of the SURE-EU system. SURE's integrity management system is described in the SURE document "Scheme principles for integrity management".

## 10 Relevant documents

With regard to the documentation (scheme documents) in the SURE-EU system, reference is made here to the document "Scope and basic scheme requirements".

SURE reserves the right to create and publish additional supplementary scheme principles if necessary.

The legal EU regulations and provisions for sustainable biomass and biomass fuels including other relevant references that represent the basis of the SURE documentation are published separately on SURE's website at [www.sure-system.org](http://www.sure-system.org). References to legal regulations always relate to the current version.

## 11 References

1

**EUROPEAN COMMISSION, DIRECTORATE-GENERAL FOR ENERGY (DG ENER) (2014):** Letter on tracing the origin of waste and residues used for biofuel production to prevent fraud (10.10.2014). Available at [http://ec.europa.eu/energy/sites/ener/files/documents/2014\\_letter\\_wastes\\_residues.pdf](http://ec.europa.eu/energy/sites/ener/files/documents/2014_letter_wastes_residues.pdf) (last accessed on 20.04.2020)

2

**EUROPEAN COMMISSION, DIRECTORATE-GENERAL FOR ENERGY (DG ENER) (2015):** Letter to the voluntary schemes that have been recognised by the Commission for demonstrating compliance with the sustainability criteria for biofuels (29.01.2015) Available at: <https://ec.europa.eu/energy/sites/ener/files/documents/PAM%20to%20vs%20on%20HBG.pdf> (last accessed on 20.04.2020).

3

A “limited assurance level” implies a reduction in risk to an acceptable level as the basis for a negative form of expression by the inspector such as “based on our assessment nothing has come to our attention to cause us to believe that there are errors in the evidence”, whereas a “reasonable assurance level” implies a reduction in risk to an acceptably low level as the basis for a positive form of expression such as “based on our assessment, the evidence is free from material misstatement”. (see ISEA 3000)

4

**EUROPEAN COMMISSION (2010):** Communication from the Commission on voluntary schemes and default values in the EU biofuels and bioliquids sustainability scheme (2010/C 160/01).

5

**EUROPEAN COMMISSION, DIRECTORATE-GENERAL FOR ENERGY (DG ENER) (2015):** Letter to the voluntary schemes that have been recognised by the Commission for demonstrating compliance with the sustainability criteria for biofuels (29.01.2015) Available at: <https://ec.europa.eu/energy/sites/ener/files/documents/PAM%20to%20vs%20on%20HBG.pdf> (last accessed on 20.04.2020).

6

**EUROPEAN COMMISSION, DIRECTORATE-GENERAL FOR ENERGY (DG ENER) (2015):** Letter to the voluntary certification schemes with guidance on how to demonstrate the protection of high biodiversity grassland (29.01.2015) at: <https://ec.europa.eu/energy/sites/ener/files/documents/PAM%20to%20vs%20on%20HBG.pdf> (last accessed on 20.04.2020).

## Annex I: Overview of certification and inspection requirements

The following applies for the area of agriculture:				
Individual producer		Documentary proof	Certificates of conformity	Scope
CAP-Conditionality (=formerly Cross compliance)	Registered scheme part.	Operation		
✓	✓	Subject to certification	Certificate	All
✓		-	-	-
	✓	Subject to certification	Certificate	All
		-	-	-
Group member		Documentary proof	Certificates of conformity	Scope
CAP-Conditionality (=formerly Cross compliance)	No CAP Conditionality (=formerly non Cross compliance)	Operation/group member		
✓		Subject to inspections	Upon request Inspection certificate	Sample inspection
	✓	Subject to inspections	Upon request Inspection certificate	All
Group manager		Documentary proof	Certificates of conformity	Scope
Registered scheme participant	No registered scheme part.	Operation		
✓		Subject to certification	Certificate	All
	✓	-	-	-

**Table 5:** Overview of certification and inspection requirements for agricultural producers

The following applies for the area of forestry:						
Individual producer				Documentary proof	Certificates of conformity	Scope
RBA Low risk	RBA Specified risk	No RBA	Registered scheme part.	Operation		
✓				Subject to inspections	Upon request Inspection certificate	Sample inspection
	✓			Subject to inspections	Upon request Inspection certificate	All
		✓		Subject to inspections	Upon request Inspection certificate	All
			✓	Subject to certification	Certificate	All
Group member/Producer				Documentary proof	Certificates of conformity	Scope
RBA Low risk	RBA Specified risk	No RBA	Registered scheme part.	Operation/group member		
Alternatives	✓			Subject to inspections	Upon request Inspection certificate	Sample inspection
	✓			First party audit	Self statement	All
	✓			Second party audit	liability statement	
	✓			Subject to inspections	Upon request Inspection certificate	All
		✓		Subject to inspections	Upon request Inspection certificate	All
Group manager				Documentary proof	Certificates of conformity	Scope
		Registered scheme part.	No registered scheme part.	Operation		
		✓		Subject to certification	Certificate	All
			✓	-	-	-

**Table 6:** Overview of certification and inspection requirements for forest producers

The following applies to the area of waste and residues:				
Producer		Documentary proof	Certificates of conformity	Scope
No registered scheme part.	Registered scheme part.	Operation		
	✓	Subject to certification	Certificate	All (on site)
✓		Subject to inspections	Upon request Inspection certificate	Sample inspection (on site)

**Table 7:** Overview of the certification and inspection requirements for waste and residues.

## Annex II: Revision Information

### Revision Information Version 3.0

Section	Change	Date of change
whole document	Version 2.0 updated to 3.0	19.05.2025
whole document	Updated reference to Revised Directive (EU) 2018/2001 (RED III)	19.05.2025
whole document	Correction of minor typos	19.05.2025
Section 2.1.1	<b>added:</b> <b>Surveillance audit</b> A scheme audit conducted during the period of validity of the SURE-EU certificate to assess whether the participant continuously meets the requirements for certification. In the SURE-EU scheme surveillance audits are conducted not mandatory but following a risk based approach (see chapter 2.4.1 Risk assessment for producers of waste and residues).  <b>added:</b> In case of group management activities there has to be at least one completely filled in and signed self-declaration available at the time of the audit on site.	19.05.2025
Section 2.4	Inspection intervals <b>Header changed to:</b> Audit intervals	19.05.2025
Section 2.5.1	<b>added:</b> KO-definition of SURE-EU criteria are requirements which, if not complied with, have a particularly critical effect on scheme integrity or which are extremely important for the scheme for other reasons.	19.05.2025
Section 2.5.2	Criteria evaluated as major ✓ corrective measures must be verifiably implemented no later than 40 days after the audit. Extraordinary circumstances may justify an extension of the time limit by another 30 days. Any such extension is subject to the PRIOR consent of SURE. <b>changed to:</b> Criteria evaluated as major corrective measures must be verifiably implemented no later than 40 days after the audit. Extraordinary circumstances may justify an extension of the time limit by another 20 days. Any such extension is subject to the PRIOR consent of SURE.	19.05.2025
Section 2.6	<b>added:</b> This may be done by digital signature or by means of manual signature on the first page of the audit report (cover sheet).	19.05.2025

Section	Change	Date of change
Section 2.9	<b>added:</b> Decisive for the validity of the certificate is exclusively the information given on the website of SUSTAINABLE RESOURCES Verification Scheme GmbH. Deviations can result for example from the withdrawal or suspension of an issued certificate.	19.05.2025
Section 3	<b>added</b> new chapter “1 <sup>st</sup> and 2 <sup>nd</sup> party audit approach for forest biomass” the following chapter numbers have been adjusted accordingly	19.05.2025
Section 5.4.1	<b>added:</b> The number of signed self-declarations at the time the sample is determined is relevant for determining the sample	19.05.2025
Section 5.6	<b>amended:</b> Whole chapter reworded for ease of understanding	19.05.2025
Section 6.1.1	<b>added:</b> The certification body is required to immediately notify SURE of any changes in its company activities that concern the prerequisites for acting as a certification body. This applies in particular to the revocation of accreditation and/or recognition by a competent authority as specified above.	19.05.2025
Section 6.1.2	At least one qualified auditor must be registered at the time of registration. <b>changed to:</b> At least two qualified auditors must be registered at the time of registration.	19.05.2025
Section 6.1.9	<b>added:</b> To ensure auditor rotation there must be at least two active auditors that are registered and confirmed by SURE to achieve the audit objectives.	19.05.2025
Section 6.1.9	<b>added:</b> To ensure auditor rotation there must be at least two active auditors that are registered and confirmed by SURE to achieve the audit objectives.	19.05.2025
Section 6.1.9	After undertaking of 3 consecutive SURE-EU audits of the same economic operator by the same auditor a new lead auditor has to be assigned through the certification body. <b>changed to:</b> After undertaking of 3 consecutive SURE-EU audits of the same economic operator by the same lead auditor - in case of audit teams - or auditor, a new lead auditor or auditor has to be assigned through the certification body. The following types of audits are counted: •Initial and •Re-certification audits	19.05.2025

Section	Change	Date of change
Section 6.3.6	<b>corrected:</b> [...] b)verify the accuracy and completeness of information entered into the Union data-base or relevant national data-base pursuant to Article 31a(5) of the Revised Directive (EU) 2018/2001	19.05.2025
Section 6.4	<b>new:</b> Chapter Transfer of certification bodies	19.05.2025
Section 7.2	Practical experience as an auditor: At least 5 audits in the last 2 years in the area applied for (e.g. PEFC, ISCC, SBP, REDcert, ISO, FSC, EfbV, EMAS), of which at least 2 group audits if group audits are planned <b>changed to:</b> Practical experience as an auditor: At least 5 third party audits in the last 2 years in the area applied for (e.g. PEFC, ISCC, SBP, REDcert, ISO, FSC, EfbV, EMAS), of which at least 2 group audits if group audits are planned	19.05.2025
Annex I	<b>updated:</b> overview of certification and inspection Requirements for forest groups	19.05.2025

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