

## Scheme principles for integrity management

Version: GSP-IMS-en-3.0  
Date: May 20<sup>th</sup>, 2025  
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# 1 SURE integrity management

The integrity management system of SUSTAINABLE RESOURCES Verification Scheme GmbH (hereinafter referred to as: scheme operator or SURE) makes a direct contribution to strengthening and securing the SURE-EU system as a voluntary scheme for implementation of the Revised Directive (EU) 2018/2001 (hereinafter referred to as: RED III). Integrity management in the SURE-EU system is understood as the totality of all activities or measures that build confidence in the SURE-EU system, its reliability and its quality, by reporting and/or prosecuting non-scheme-compliant behaviour and by investigating other unwanted incidents.

This includes both the possibilities to evaluate individual requirements (degree of fulfilment) within the scheme as well as measures designed to promote transparency and acceptance vis-à-vis all interested parties.

The aim of the integrity management system is to achieve the best possible combination of oversight and accountability among stakeholders in the implementation of the scheme requirements, while maintaining confidence in the SURE-EU system and the credibility of this voluntary scheme with all stakeholders.

## 1.1 Transparency within the SURE voluntary scheme

Continuous improvement (e.g. DIN EN ISO 9000:2015-11) of the fulfilment of the basic scheme requirements affects not least of all the quality of verification by the scheme operator. These scheme requirements include:

- ✓ accessibility
- ✓ transparency/clarity
- ✓ traceability/plausibility
- ✓ protection against tampering
- ✓ credibility/reliability
- ✓ trustworthiness

To meet the transparency requirements of legislators, but even more importantly, our own standards for maintaining the integrity of the voluntary scheme, the scheme operator upholds different principles, for example:

- ✓ transparency in scheme representation
- ✓ transparency in scheme membership

- ✓ transparency in scheme management
- ✓ transparency in certification
- ✓ assuring scheme integrity and preventing scheme misuse and fraud
- ✓ continuous improvement

As a result of the outcomes of different measures that have been taken, such as prevention, monitoring, correction or sanctions, there are requirements or opportunities that the scheme operator takes into account when managing the SURE-EU system. This ensures continuous improvement, among other things with regard to the suitability, adequacy and effectiveness of the voluntary scheme.

The measures that contribute to the transparency required by legislators are described in section 7.

## 1.2 Structure of the SURE integrity management system

To *maintain scheme integrity*, the scheme operator has introduced sub-systems within the integrity management system, which are activated depending on the incident. For the scheme operator, this includes:

- ✓ the compliance management system (see section 3)
- ✓ the complaint management system (see section 4)
- ✓ the sanction management system (see section 5)
- the crisis management system (see section 7)

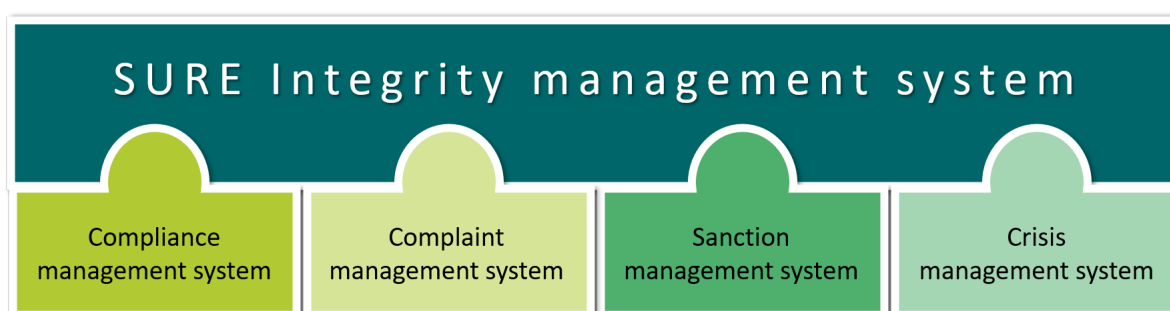


Figure 1: Structure of the SURE integrity management system

In addition, the scheme operator has established effective activities within the SURE voluntary scheme to reduce the potential risk of scheme irregularities, violations, abuse and fraud and to effectively combat these kinds of tendencies. These include:

- ✓ risk analysis
- ✓ monitoring
- ✓ preventive measures
- ✓ control measures

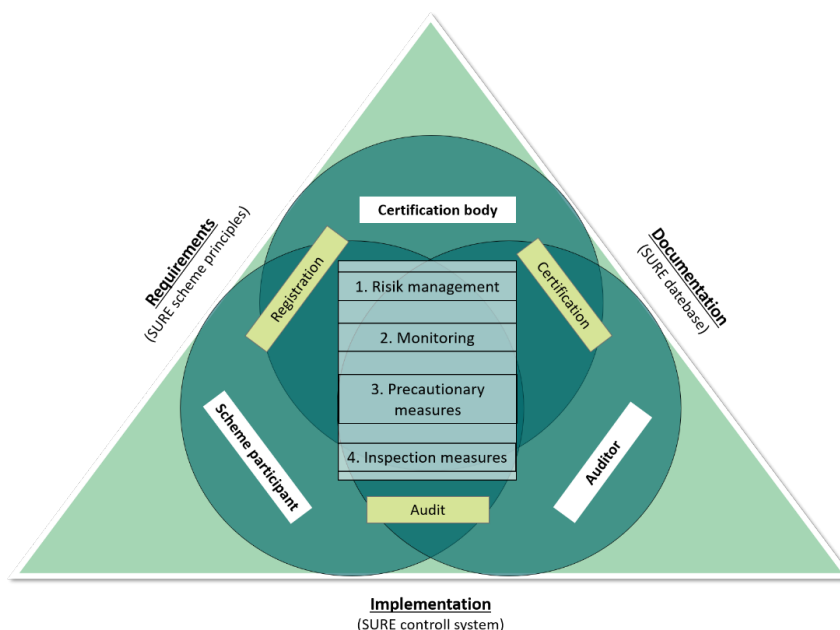
### 1.2.1 Risk analysis

A risk analysis generally includes all activities carried out to *assess, evaluate and prioritise risks*. The primary aim of risk analysis within the SURE-EU system is to systematically identify and assess risks that could jeopardise the integrity of the voluntary scheme. The result of this analysis provides the basis for taking preventive, monitoring, corrective or even sanction measures, including their appropriate frequency and/or intensity. This enables the scheme operator to strengthen his monitoring and inspection activities to ensure implementation of the requirements of the Revised Directive (EU) 2018/2001 and the scheme-specific requirements with the highest possible level of assurance.

### 1.2.2 Monitoring

The term *monitoring* is used in many contexts. This term generally covers all activities aimed at establishing the integrity of the parties interested in the SURE-EU system.

In the SURE-EU system, the term “monitoring” mainly refers to the collection and evaluation of information on compliance with the scheme requirements. It is a way to ensure system integrity.



**Figure 2:** SURE integrity management system – monitoring model

### 1.2.3 Preventative measures

Based on the relevant ISO standards for quality management, the scheme provider takes measures to prevent non-scheme-compliant conduct or activities, which are intended to prevent the occurrence of these or other undesirable incidents or even more so to systematically eliminate the cause of these incidents. Whether the preventive measure to be taken is appropriate or not is determined based on risk. The identification and assessment of unwanted incidents and any measures taken are documented. This approach contributes to:

- ✓ maintaining the integrity of the SURE-EU system
- ✓ preventing or reducing non-conformities that could jeopardise the voluntary scheme
- ✓ making improvements, for example related to scheme optimisation, its further development by the scheme operator and its proper implementation by the scheme users.

### 1.2.4 Control measures

To ensure the sustainable production and use of biomass, all economic operators along the entire value chain must be checked. Certification bodies approved and registered with the scheme operator check *compliance with the scheme requirements* along the entire *production, processing and supply chain*. The following conditions must be met/established for the *inspection and certification* of an economic operator:

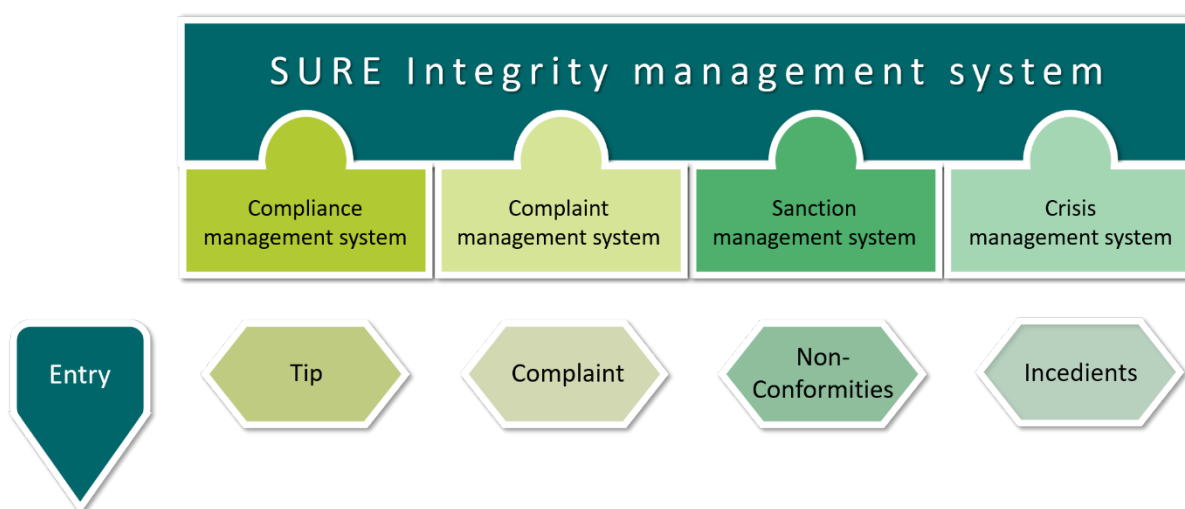
- 1) The economic operator has registered. (The control measure undertaken here is the verification of the information provided, particularly in relation to “other” certifications and company renaming activities to prevent scheme hopping, which is the ultimate goal.)
- 2) The economic operator has signed a scheme contract (this means that his data is entered in the SURE database. This is the only way the economic operator is entitled to obtain a SURE certification.)
- 3) The economic operator has appointed a SURE certification body to carry out SURE-EU certification. (The certification body sends a legally binding declaration to the scheme operator.)
- 4) The scheme operator expects that an economic operator interested in SURE-EU certification has informed himself about the scheme requirements that need to be fulfilled before the certification body carries out its inspection (audit). (Information on these requirements is available to the economic operator on the scheme operator’s website.)

The audit and certification process comprises the following steps:

- 1) The commissioned certification body conducts the initial audit of the operation (on-site audit and evaluation of the scheme requirements).
- 2) The certification body writes the audit report and saves it in the SURE database.
- 3) The scheme operator spot checks the reports submitted.
- 4) The certification body issues the certificate and enters the certificate data in the SURE database. All valid certificates are published at [www.sure-system.org](http://www.sure-system.org).

## 2 Management of scheme integrity

The type of non-compliance with requirements of the SURE-EU system or the type of other undesirable incidents determines the input to the relevant management sub-system of integrity management.



**Figure 3:** SURE integrity management system - workflow of the individual sub-systems (start)

For example

- ✓ *Tips* provided by interested parties, such as national or international authorities and organisations, by economic operators or certification bodies, as well as through SURE internal monitoring activities are reviewed on the *compliance management system* (see section 3.3).
  - ✓ *Complaints* from interested parties, for example national or international authorities and organisations, but also from economic operators or certification bodies via the *complaint management system* (see section 4).
  - ✓ *Non-conformities* from interested parties, e.g. from SURE certification bodies, are passed on to the *sanctions management system* (see section 5).
- Non-conformities in this context are interface KOs, whereby a KO of a producer or collector holding being an exception to this rule.
- ✓ *Incidents* with potential to trigger a crisis are analysed using the crisis management system (see section 7).

Incidents are handled by internal instruments of the scheme operator that promote transparency and acceptance and that are documented with strict confidentiality. They are therefore not part of the SURE scheme principles.

All incidents must be documented in writing by interested parties for further processing. They are handled confidentially and, upon request, anonymously by the system operator.

All incidents can be submitted via the following channels:

- ✓ anonymously (option on the SURE website)
- ✓ by e-mail to [ims@sure-system.org](mailto:ims@sure-system.org)
- ✓ by fax to +49 (0) 228 35060 280
- ✓ by post to the following address:  
 SUSTAINABLE RESOURCES Verification Scheme GmbH  
 Schwertberger Straße 16  
 53177 Bonn  
 Germany

All current contact information is publicly available at [www.sure-system.org](http://www.sure-system.org).

Complaints and appeals submitted to SURE must meet the following criteria:

- ✓ The reason for the complaint or appeal is well-founded and not immaterial.
- ✓ The addressee of the complaint or appeal is SUSTAINABLE RESOURCES Verification Scheme GmbH.
- ✓ Complaints and appeals must be clearly identified as such.
- ✓ If the appeal or complaint is directed against the activities or decision of a certification body, all the complaint and appeal procedures of that certification body must first have been followed. Only when these procedures have been completed with a written decision can SURE be contacted.
- ✓ Complaints and appeals must be submitted in writing and must include basic information about the reporting person, including name and organisation, in order to address any potential conflict of interest. If the reporting person intends to remain anonymous during the further process, he or she must indicate this at the time of submission and provide a reasonable explanation for this request.
- ✓ The submitted complaint or appeal must be accompanied by documentation that details the facts of the case in such a way that any impartial individual or party can form a clear picture and understanding of the situation at hand. The supporting documentation should include a summary of the issues and the relevant stakeholders/parties involved.

All submission types can result in monitoring, preventive, corrective and/or sanction measures (e.g. special audits or integrity assessments conducted by SURE).

Participation in a planned SURE integrity assessment or special audit is mandatory for all SURE contract parties. Refusal to participate may be considered a serious violation of the SURE requirements and will be sanctioned.

Measures to ensure system integrity may be initiated by SURE even after the certificate in question has expired. The (former) SURE contract partner (scheme participant and/or certification body) is asked to participate in these measures and to actively contribute to clarifying the situation.

Further details on the submission of complaints are provided in section 4.

### 3 Compliance management system

The SURE voluntary scheme guarantees that the sustainability certification under RED III is implemented in compliance with the law for the biomass of the entire production, processing and supply chain.

The audits carried out as part of the certification process serve to *systematically monitor* all scheme participants and are the main tool for identifying scheme violations.

The legal requirements can be broken down into the following groups/topics with regard to the *potential risk of possible non-compliance*:

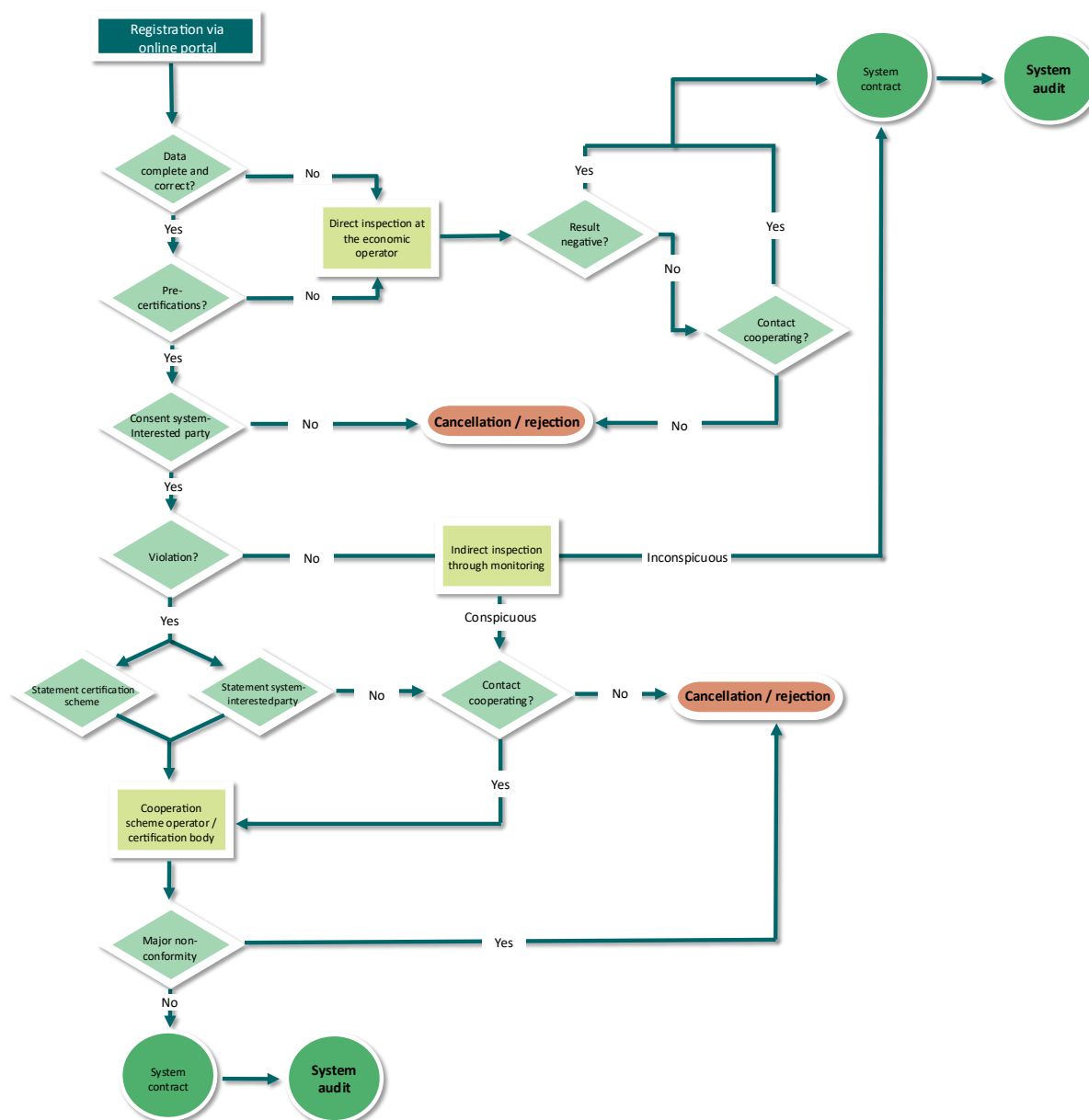
- a) sustainability requirements for the production/development and use of biomass to generate electricity and heat, taking into account applicable legal requirements and basic social standards
- b) requirements for the GHG emission saving and the calculation method
- c) requirements for the verifiable traceability and mass balancing for the continuous proof of origin of biomass over the entire production and supply chain

In addition to these requirements, the scheme operator defines scheme requirements

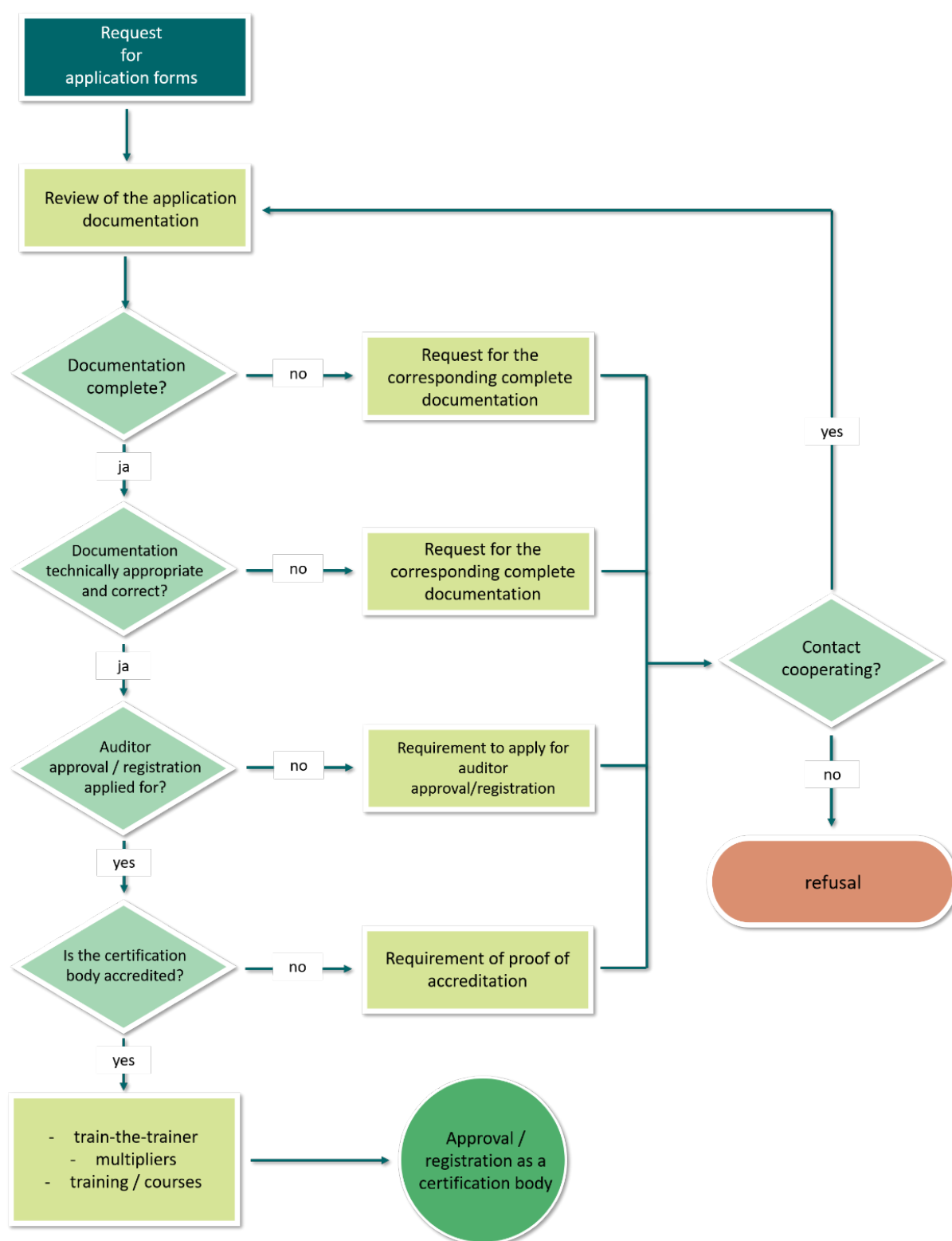
- d) for the quality of the documentation and
- e) for the chain of custody, in particular for the monitoring and certification of the companies involved.
- f) for the assessment of the risk of unsustainable production of forest biomass

All of the above requirements are formulated in detail in the relevant scheme documents (scheme principles and technical guidance documents).

The scheme operator has established processes that serve to promote scheme transparency and thus ensure compliance. The two diagrams below show examples of the processes involved in the preventive measures to be taken when a potential scheme participant or a potential certification body becomes affiliated with the scheme (e.g. to prevent any “scheme hopping”).



**Figure 4:** Preventive measures when a potential scheme participant registers with the scheme



**Figure 5:** Preventive measures when a potential certification body becomes affiliated with the scheme

## 4 Complaint management system

A “complaint” is a statement by an interested party that expresses dissatisfaction and is linked to a claim against the activities of the scheme operator. A complaint does not justify a legal claim against the scheme operator.

Complaints of any kind may be an *indication of suspected violations or weaknesses* in scheme participants, certification bodies and the voluntary scheme itself, and may trigger additional inspections. The scheme operator has set up a complaint management system for this purpose.

It is the case that staff assigned by the SURE management to handle the complaint must not have any conflict of interest related to the complaint and they must not be involved in handling the complaint if there is a conflict with the respective complainant (e.g. if the complaint is directed against the activities of a SURE staff member).

Grievances, complaints and appeals are deemed inadmissible if they meet any of the following criteria:

- ✓ The requirements related to form and content are not met (see section 2). This includes complaints and appeals that are not sufficiently supported by objective and sufficient evidence necessary to obtain a clear idea and understanding of the situation at hand. Complaints and appeals based on hearsay are not considered sufficient evidence.
- ✓ The complaint or grievance seeks changes to the recognised SURE-EU scheme.
- ✓ The complaint or appeal seeks to change sanctions imposed by SURE for violations or infringements of SURE requirements.
- ✓ The reason for the complaint does not explicitly relate to SURE or to activities carried out under SURE.

Any complaint that meets the requirements in terms of form and content is accepted, analysed and tracked. Possible reporting persons could be, for example

- ✓ scheme participants or certification bodies
- ✓ competent offices of the European Commission
- ✓ competent national authorities and offices
- ✓ non-governmental organisations (NGOs)

The individual steps in the complaint process are carefully documented by the scheme operator.

The complaint process ensures the confidentiality and protection of persons who report infringements or log complainants. In accordance with Directive (EU) 2019/1937 the identity of the reporting person is not disclosed to anyone beyond the authorised staff members competent to receive or follow up on reports, without the explicit consent of that person. This shall also apply to any other information from which the identity of the reporting person may be directly or indirectly deduced (Chapter 5, Article 16 (1)). By way of derogation from paragraph 1, the identity of the reporting person and any other information referred to in paragraph 1 may be disclosed only where this is a necessary and proportionate obligation imposed by Union or national law in the context of investigations by national authorities or judicial proceedings, including with a view to safeguarding the rights of defence of the person concerned.

The person (reporting person) who initiates the complaint as well as any other parties involved (e.g. competent authorities or the European Commission) are informed of the results of the investigations.

Upon request by the European Commission or a Member State, SURE shall provide all documents related to a complaint and its handling.

Where serious scheme violations are found as a result of a complaint procedure, they are followed up in the same way as the SURE scheme audits under the sanctions management system (see section 5).

Systematic documentation and complaint management contributes to the sound integrity and quality of the SURE-EU system. SURE keeps a register of all complaints and is required to provide a summary of these complaints to the Commission through the annual reporting process for reasons of transparency.

If a complaint represents a potential crisis for SURE, the crisis management system is activated by the scheme operator in parallel to the complaint process.

The Integrity Management rules and the complaint management are part of the regular internal trainings for authorised SURE personnel and all SURE employees.

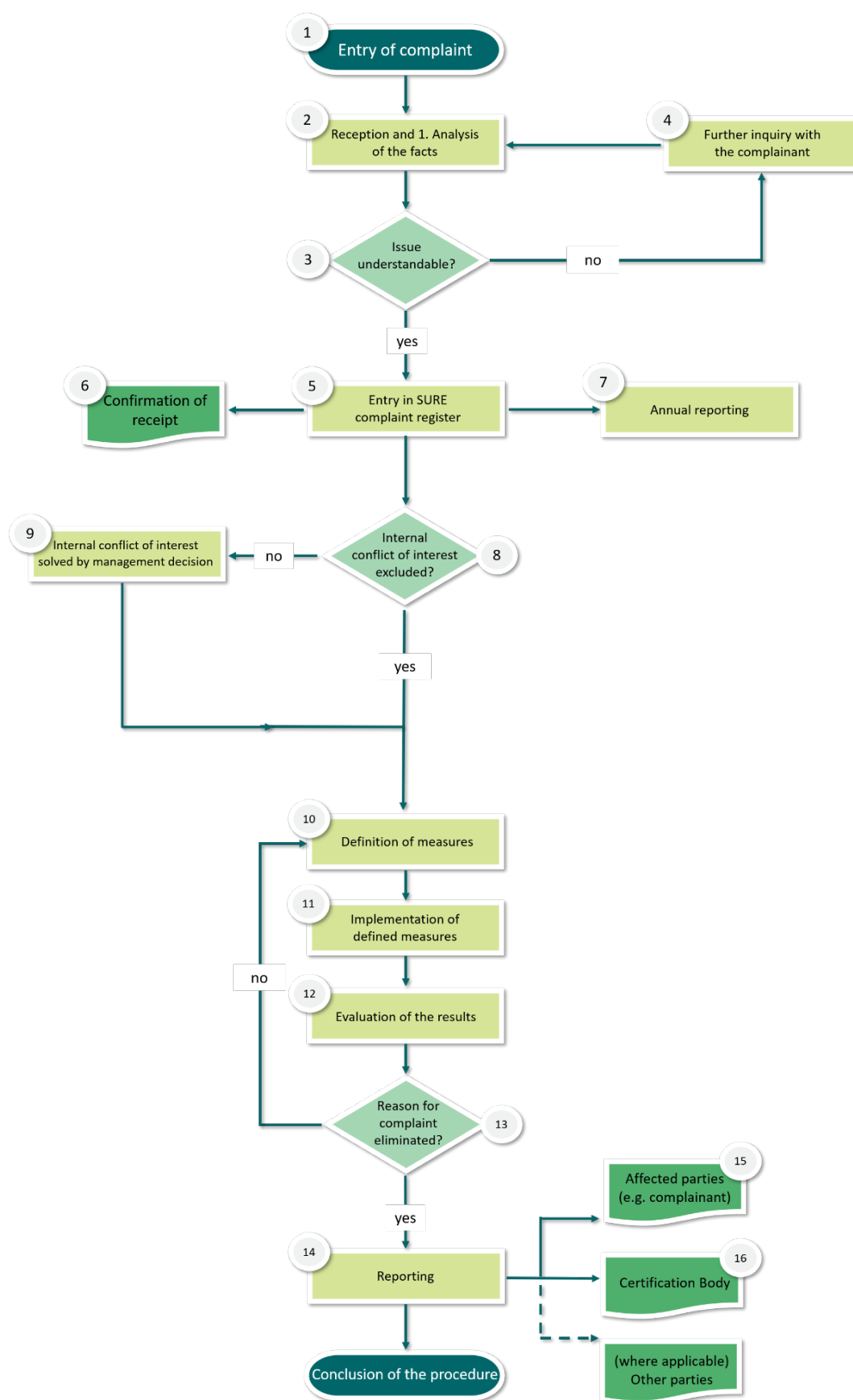


Figure 6: Diagram of the complaint process

The workflow shown in the diagram above looks as follows in detail:

①

All communication channels are available to the reporting person to submit his complaint to the scheme operator: e-mail, fax, letter by post (for details, see section 2, Scheme integrity management)

②

The scheme operator decides whether the report meets the definition of a complaint and verifiable information is available. If so, he documents the *receipt of the complaint* and generates a progress report in which all other measures and incidents related to the complaint are entered chronologically and linked to the relevant information and accompanying documents.

As part of an *initial analysis of the complaint*, the following is systematically determined and documented:

- ✓ the reporting person (including contact details) and taking into account the Directive (EU) 2019/1937)
- ✓ the reason for the complaint (information on the companies involved, types and quantities of biomass/biomass fuels or electricity/heat, time periods and other details)
- ✓ possible causes of the complaint (as long as this can be determined with certainty at that time)
- ✓ potential magnitude of the complaint with respect to the integrity of the SURE system

③

The complaint is understandable and admissible according to the SURE guidelines for complaints.

④

If the *complaint is not sufficiently clear*, the reporting person who initiated the complaint is contacted and an attempt is made to obtain the missing information from the perspective of the reporting person.

⑤

SURE keeps a register of complaints received and measures taken, which ensures a transparent process to reduce conflicts of interest and the possibility of monitoring.

⑥

If the *complaint is sufficiently substantive and convincing*, the reporting person receives a letter/e-mail within five working days confirming receipt of the complaint with assurance that the complaint will be further investigated and that information on its progress will be provided.

⑦

SURE is required to provide a summary of the registered complaints to the Commission through the annual reporting process for reasons of transparency.

⑧

Possible conflicts of interest are investigated.

⑨

If internal conflicts of interest are identified, they are resolved by a decision of the management (e.g. if the complaint is directed against an employee of SURE, the employee is exempted from handling the complaint by the management).

⑩

The scheme operator determines *measures* to permanently eliminate the reason for the complaint and its causes.

⑪

The reason for the complaint must be explained and eliminated by the person concerned (e.g. scheme participant or certification body).

⑫

The scheme operator reviews the *complaints* of the reporting person who submitted the complaint or directly checks the implementation and effectiveness of the measures specified by the person or identified by the scheme operator.

⑬

If the assessment of the effectiveness of the measures (e.g. result of another audit) is not satisfactory, a new cycle of measures (see ⑩) is initiated in accordance with the PDCA cycle (Plan-Do-Check-Act) until the complaint is settled or it is followed up in the same way as the SURE-EU sanctions procedures

⑭

Before the complaint procedure is concluded, a *summary report* is created.

⑮

The parties involved (reporting person as well as the party against whom the complaint is directed) are informed of the results of the investigations within 5 working days after the complaint procedure was concluded.

⑩

If the complaint concerns a scheme participant, the responsible certification body is informed of the results of the investigations to be able to analyse facts relevant to the complaint (e.g. implemented measures) in a regular or commissioned special audit at the request of SURE.

## 5 Sanction management system

A voluntary scheme for sustainably produced biomass is required have measures in place that are initiated in the event that a certification body determines that an economic operator participating in the voluntary scheme does not meet or no longer meets the requirements set forth in the relevant directives or regulations or additional requirements of the voluntary scheme.

Non-conformities in how the SURE EU system is used by a scheme participant can be identified in different ways, in particular through

- ✓ an audit by the neutral certification body responsible or
- ✓ an unscheduled audit by an auditor contracted by the scheme operator.

The ultimate aim of the SURE sanction management system is to effectively counter scheme violations (with the exception of initial audits). The escalation of sanctions measures includes indicative requests (warnings), official warnings (reprimands), possibly in conjunction with a contractual penalty, and the extraordinary and immediate termination of the SURE scheme contract. This is described in more detail in section 7.

In cases of non-conformities (< 75% and/or KO evaluation(s)), which are found during the above audits (except for initial audits) and do not guarantee the integrity of the scheme, an independent advisory board decides on possible sanctions. The members of this Sanction Committee are appointed by the general meeting of the scheme operator and can also be dismissed by this meeting. How the Sanction Committee works, i.e. its responsibilities and functions, is laid down in rules of procedure and implemented through a master agreement with the appointed members.

The members need to have technical and professional knowledge and many years of experience in agriculture and forestry and in the field of waste and residues, as well as in the markets of electricity and heat production from solid biomass and biogas, but may not be subject to potential conflicts of interest resulting from past or present professional activities. The chair of the Sanctions Committee must be a lawyer with the necessary qualifications to hold the

office of judge. This combination ensures that violations of the SURE-EU system are handled in compliance with technical and legal requirements without the risk of conflicts of interest.

All sanction cases entered into the sanction management system are recorded/managed in the SURE database.

## 6 Appeals procedure

This section aims to outline a transparent procedure for receiving, evaluating and deciding on appeals against decisions taken by SUSTAINABLE RESOURCES Verification Scheme GmbH (hereinafter SURE). This does not include accreditation decisions taken by superordinate national accreditation bodies or the national competent authorities.

This section details the procedure to be followed by SURE and the appellant in the event of an appeal against SURE. Appeals under this procedure can only be filed by legal entities that were affected by the negative decision.

All aspects of this procedure are considered standard unless otherwise stated.

This procedure is only followed to handle appeals from SURE participants. It does not replace other requirements established to handle appeals by certification bodies that are accredited by SURE (or have applied for accreditation) or scheme participants.

Note: If the appeal is directed against the activities or decision of a certification body, all the complaint and appeal procedures of that certification body must first have been followed. Only when these procedures have been completed with a written decision can SURE be contacted.

### 6.1 General information

An “appeal” is a request by a party subject to a decision for a review of a negative decision issued by SURE in relation to the SURE-EU voluntary scheme.

Disputes must be settled mainly through discussions and negotiations or mediation. Formal procedures, including committees, must only be used as a last resort.

Disputes should always be dealt with at the lowest possible level and those involved are strongly encouraged to follow this principle.

NOTE: Disputes that are not first dealt with at the lowest level will be referred to the correct entity, which can affect the length of time it takes to resolve the dispute.

All parties involved in the process must refrain from commenting publicly on the appeal until a decision is made and all parties have been informed accordingly.

All disputes relating to the SURE-EU system will be dealt with in a fair process and in accordance with the following guidelines:

- ✓ A person or organisation who is the subject of an appeal must be given adequate information about the procedure (including details of the appeal).
- ✓ A decision-maker must declare any personal interest they may have in the procedure.
- ✓ A decision-maker must be unbiased and act in good faith. This is why the decision-makers may not be one of the parties involved in the appeal, nor may they have an interest in the outcome.
- ✓ The procedure must be conducted fairly towards all parties involved in the appeal.
- ✓ Each party to the procedure has the right to ask questions and to object to evidence provided by the other party.
- ✓ A decision-maker must take into account relevant considerations and mitigating circumstances and disregard irrelevant considerations.
- ✓ The Managing Director of SURE may delegate the task of handling appeals to employees of SURE as appropriate.

## 6.2 Specific terms and definitions

For the purposes of the appeals process, the terms and definitions set out in the SURE Technical Guidance “Definitions in the SURE system” apply. The following applies:

<i>Application:</i>	An application as defined in section 6.5 “Initiating an appeal”.
<i>Appeals Committee:</i>	Independent committee established by SURE to resolve an appeal against a SURE decision.
<i>Appellant:</i>	Person or organisation submitting an appeal.
<i>Binding decision:</i>	The binding decision of the Appeals Committee.
<i>Dispute:</i>	Generic term for the following:
<i>Appeal:</i>	Request by a party affected by a decision for a review of a negative decision by SURE under the SURE-EU voluntary scheme.

*Complaint:* A “complaint” is a statement by an interested party that expresses dissatisfaction and is linked to a claim against the activities of SURE. A complaint does not justify a legal claim against SURE.

*Parties to the appeal (or complaint):* The appellant/complainant, the person against whom the complaint is submitted and all parties considered relevant to the appeal (or complaint) by SURE.

*Appellee:* A participant in the SURE scheme or a certification body recognised by SURE who is the subject of an appeal.

*Stakeholder:* Any individual or group whose interests are affected by the voluntary SURE-EU scheme.

Verbal forms for expressing stipulations:

*must:* indicates which specifications must absolutely be followed to ensure conformity with the document.

*should:* means that one of several options is recommended as particularly suitable without mentioning or excluding others, or that a particular approach is preferred but not mandatory.

*may:* indicates a procedure *that* is permissible within the scope of the document.

*can:* is used in statements about possibilities and capabilities, regardless of whether they are material, physical or causal.

## 6.3 Scope and admissibility

These rules apply to disputes relating to a SURE scheme participant and/or a SURE recognised certification body subject to the conditions set out therein.

The Appeals Committee is responsible for resolving disputes relating to a SURE scheme participant and/or a SURE recognised certification body by a binding decision.

An application is deemed inadmissible by the Appeals Committee if one or more of the following conditions are fulfilled:

- a) if the dispute has been tried before a court or is pending before a court prior to the appeals procedure
- b) if the dispute against a certification body recognised by SURE has not been referred to the relevant committee of that certification body before the application is submitted
- c) if the dispute against a certification body recognised by SURE has not resulted in a written decision by that certification body's dispute resolution committee before the application is submitted
- d) if the reason for the dispute is not the design of the voluntary SURE-EU scheme or is not related to it
- e) if the application has not been submitted to SURE within 6 weeks of the date of the contested decision
- f) if the applicant has not paid the appeals fee by the due date (see the explanations in section 6.6).

## 6.4 Composition of the Appeals Committee

The composition of the Appeals Committee corresponds to that of the Sanctions Committee and is set out in section 5 of the SURE document "Scheme principles for integrity management".

## 6.5 Initiating an appeal

An appeal is initiated by sending the application to SURE by registered mail. It is the responsibility of the appellant to ensure that the letter has been received by SURE. The address of SURE is published on SURE's website (<https://sure-system.org/en/contact.html>).

The application must be written in German or English and contain the following information at a minimum:

- ✓ the names and addresses (including e-mail addresses) of the parties to the dispute and the signature of the legal representative of the appellant or of the person concerned if the appeal has not been filed by an organisation
- ✓ a clear description of the facts and circumstances of the dispute
- ✓ reference to the written decision of the certification body's dispute resolution committee (if applicable) with a copy of the decision enclosed
- ✓ a clear description of the complaint, including the remedy sought

- ✓ details of the steps taken to resolve the problem before the appeal was filed
- ✓ an agreement to abide by the terms and conditions of this procedure

The appellant may, at his own discretion, withdraw the appeal free of charge until the first meeting of the Appeals Committee.

The application must be sent with copies of the relevant documents, which are clearly enclosed with the application as an annex and numbered.

If the Appeals Committee considers the application to be incomplete, it will grant the applicant a period of time to complete it, as determined by the Appeals Committee. If the applicant fails to complete the application within this period, the Appeals Committee declares the application inadmissible.

## 6.6 Appeals fee

If the application is deemed admissible, the applicant will receive an invoice with a payment deadline of 14 days for a fee in the amount of EUR 3,000 (three thousand euros) or an amount to be determined by the Appeals Committee. In addition to the fee, the Appeals Committee may require the applicant to pay one or more additional fees until the appeals procedure has been completed.

If the applicant fails to pay the fee or the additional fee by the due date, the application is deemed inadmissible by the Appeals Committee.

Depending on the outcome of the appeals procedure, the fee and any additional fee will either be offset against the costs of the Appeals Committee as per section 6.8 or reimbursed to the applicant by SURE within four weeks of the date of the binding decision.

## 6.7 Procedure

### 1) SURE

- informs the parties that the application has been received
- provides the appellee with a copy of the application
- informs the parties which members of the Appeals Committee are tasked with handling the dispute

within thirty (30) days of the written acceptance of the appeal.

- 2) The appellant is requested to confirm in writing within ten (10) days that he agrees with the composition of the Appeals Committee. Otherwise, he is deemed to have accepted the composition of the Appeals Committee.
- 3) The appellee must submit a written reply to SURE within 4 weeks of the date of SURE's letter (see item 1). The appellee must send a copy of his reply to the applicant in parallel.
- 4) Upon receipt of the appellee's reply, SURE notifies the parties of the date and time for a hearing before the Appeals Committee. The Appeals Committee may invite the parties to explain their positions in more detail. The hearing takes place behind closed doors.
- 5) The Appeals Committee has the right to decide, on its own initiative or at the request of the parties, to call witnesses or experts. The Appeals Committee informs the parties if it decides to call witnesses or experts. The parties may be present during the examination of the witnesses or experts by the Appeals Committee. The parties may cross-examine the witness or expert. The Appeals Committee provides a copy of the witness report to the parties.
- 6) The parties may be represented by a representative or lawyer in the event of a dispute. The parties inform the Appeals Committee as soon as possible once a representative has been appointed. To this end, they submit a duly signed power of attorney or a corresponding confirmation of mandate to the Appeals Committee.
- 7) The Appeals Committee reviews the evidence supporting the appeal and reports its assessment and binding decision to the Managing Director of SURE within a reasonable period of time after the Appeals Committee is set up.

## 6.8 Binding decision and cost allocation

The Appeals Committee resolves the dispute by a binding decision. SURE sends the binding decision to the parties as soon as possible.

The binding resolution must contain the following in addition to the resolution itself:

- ✓ the names and addresses of the members of the Appeals Committee who handled the dispute
- ✓ the names and addresses of the parties
- ✓ the date of the binding decision
- ✓ the jurisdiction of the Appeals Committee
- ✓ the admissibility of the application

- ✓ the reasons for the decision and
- ✓ a decision on the reimbursement of the guarantee paid

Each party bears its own costs for the appeals procedure, including the costs of representation and/or other advice in connection with the dispute.

The unsuccessful party pays the costs of the Appeals Committee in the dispute proceedings. If each of the parties is partially unsuccessful, the Appeals Committee may divide all or part of the costs of the dispute pro rata at the Appeals Committee's discretion

The costs of the Appeals Committee in the dispute includes the fees and expenses of the members of the Appeals Committee, the (Deputy) Chair and the costs of their meetings. A party who bears all or part of the costs of the Appeals Committee in the dispute proceedings pays those costs in full to SURE within 30 days of receipt of the invoice, offsetting them against the fee and any additional fee paid.

## 6.9 Other information

All documents and information related to the dispute, including from a hearing, must be in English or German, unless the Appeals Committee decides otherwise.

The members of the Appeals Committee are bound to confidentiality and may not disclose any information related to the dispute to third parties.

SURE may provide the European Commission or the competent national authorities with an anonymous version of the binding decision, which may be made public.

To the extent permitted by German law, neither SURE, its employees and officers, the Appeals Committee and its members, nor any third parties, agents and individuals appointed by them, are liable to the parties or any third party for any claims, losses, costs or damages of any kind whatsoever, whether direct or indirect, arising out of any appeals procedure under the rules set out herein.

Events or decisions not covered by these rules will be decided by the Appeals Committee, taking into account the principles of fairness and reasonableness.

## 7 Crisis management system

For the scheme operator, crises represent incidents that

- ✓ (can) damage the image/reputation of the company
- ✓ (can) affect the public trust in the voluntary scheme or the scheme operator
- ✓ (can) cause economic damage.

To be able to deal confidently with crisis situations, the scheme operator has established a crisis management system. Crisis management is closely linked to the risk analysis outlined above, but the scheme operator sees the need to set up a separate set of instruments for crisis situations.

The crisis management system is an internal SURE management tool whose documentation is subject to strict confidentiality. They are therefore not part of the SURE scheme principles.

## 8 Measures

### 8.1 Measures to ensure scheme integrity

Economic operators and certification bodies failing or unwilling to comply with the requirements set out in paragraphs 1 to 6 of Article 17 of the Implementing Regulation (EU) 2022/996 must be excluded from participating in and conducting audits under SURE.

#### 8.1.1 Transparency in scheme presentation

SURE informs the interested public (potential scheme users, media, associations and special interest groups) extensively about the content and requirements of the voluntary scheme. All approved scheme documents required for implementation and monitoring the system are available at [www.sure-system.org](http://www.sure-system.org). In addition, SURE provides tools and informational materials to scheme participants and the certification bodies who work for them. Interested parties and authorities thus have the opportunity to view these documents at any time and keep up to date on the current status of the scheme by receiving a free newsletter.

### 8.1.2 Transparency in scheme membership

SURE concludes written *contracts* with both the scheme participants (economic operators) and the certification bodies operating in the SURE-EU scheme, which clearly define the rights and obligations of the respective parties.

These contracts ensure that the requirements of the voluntary scheme:

- a) are binding in their application
- b) can be verified and are transparent
- c) can, when necessary, be enforced with legal means

The contracts are carefully structured standard documents. Individual agreements relating to the scheme requirements are not made.

### 8.1.3 Transparency in scheme management

The scheme operator uses a *database* to manage the voluntary scheme that documents all

- ✓ scheme participants including all of the dependent operational sites of each member registered
- ✓ audits conducted (certification documentation) regardless of result
- ✓ all sanction measures

The scheme management is always able to give interested parties information about the status of the participants, audits and sanctions.

### 8.1.4 Transparency in certification

To make it possible for all economic operators to have a transparent and tamper-proof *overview of all certificates of conformity issued in the SURE-EU system* – valid, expired and suspended – the SURE database publicly makes these certificates available online together with detailed information on the validity and the scope of application ([www.sure-system.org](http://www.sure-system.org)).

### 8.1.5 Assuring scheme integrity and preventing misuse and fraud

SURE has effective processes to reduce the potential risks of scheme violations, misuse and fraud and effectively combat these kinds of tendencies.

✓ **Registration process for new, potential scheme participants**

Every potential scheme participant must disclose upon registration whether and to what extent he was already or is still a participant of another certification scheme. In addition, the reason for the scheme change must be indicated and, in the event of a scheme expulsion due to violations, the scheme operator has the right to obtain detailed information about the violations in question from the previous and current certification scheme. These prerequisites are intended to prevent “scheme hopping”.

✓ **Systematic monitoring of GHG balances and the GHG savings declared in the sustainability certificates**

For the systematic monitoring of GHG balances and the GHG savings declared in the proofs of sustainability, the scheme operator envisages close cooperation with the national authorities. Cooperation between the national authorities and the scheme operator requires national legislation to implement RED III, which was not yet in place at the time the scheme documentation was written. The scheme documentation is adapted as soon as national requirements exist.

✓ **The protected brand “SUSTAINABLE RESOURCES Verification Scheme”**

SUSTAINABLE RESOURCES Verification Scheme has a service mark of the same name registered with the European Trademark Office. It may be used exclusively by the scheme participants and recognised certification bodies. This trademark right gives rise to extensive options to take action against misuse or fraudulent use of the SUSTAINABLE RESOURCES Verification Scheme brand without any other proof of non-compliant scheme behaviour being necessary.

## 8.2 Measures to ensure scheme compliance

The scheme operator optionally provides *country-specific* documents for selected EU member states and third countries, in which information on regional and country-specific conditions (e.g. risk assessments, protected areas etc.) is documented.

To import *waste and residues or biomass fuels*, SURE expressly reserves the right to explicitly recognise other individual (voluntary) schemes, provided that they meet the at least requirements equivalent to those set by the scheme operator. If an economic operator wants to “import” *biomass or biomass fuels* from other (voluntary) schemes for further processing or delivery under the SURE system, he must ensure that the same information on sustainability characteristics and proof of these characteristics is available for these consignments of biomass or biomass fuels as for consignments under the SURE-EU system.

When *economic operators register* to use the SURE-EU system, they are asked for specific information. The scheme operator checks the data submitted by the economic operator to ensure that it is accurate and complete and checks for the existence of previous or simultaneous certifications in other certification schemes and any violations of requirements. SURE only concludes a scheme contract with the economic operator if the information provided is complete and true.

Depending on the type of biomass (*agricultural biomass, forest biomass, waste and residues*), economic operators must fulfil *specific requirements* with regard to the requirements of RED III and those of the scheme operator. They are explained in more detail in the relevant scheme documents of the scheme operator.

To meet the requirements set out in the Directive, all biomass fuels produced under the SURE-EU system must be shown to have a *GHG emission saving* that complies with the applicable legal minimum requirements compared to emissions from comparable fossil fuels, if they are to be used in biomass plants to generate electricity or heat which are required to demonstrate GHG reduction. Every economic operator along the production and supply chain through to the producer or the conversion plant (corresponds to the “last interface” and is generally called this as well) must specify the *GHG emissions* of the biomass he supplied/produced.

Furthermore, an *information and traceability system* must be set up by every economic operator who monitors every step along the production and supply chain to ensure the continuous proof of origin for the biomass and to ensure that a unit of sustainable biomass has not been sold more than once (“multiple claiming”). In addition, the SURE-EU scheme requires a *mass balancing system*.

Proper *documentation* is a mandatory component of a certifiable management system.

## 8.3 Measures to resolve complaints

To *eliminate the cause of a complaint*, the scheme operator first contacts the party (e.g. scheme participant or certification body) named in the complaint and confronts the party with the allegation, as long as it is not SURE itself. If the reason for the complaint is a direct or potential threat to the SURE-EU system, the scheme operator is authorised to carry out *special audits* (see SURE document “Scheme principles for the certification process – Requirements and specifications” for more information).

Prior to this, the party against whom a complaint has been filed will be invited to review the reason for complaint and *submit a written reply within 10 working days*. If the party does not object to the complaint, he is directly requested to eliminate the reason for the complaint and its causes.

The reply submitted by the reporting person and the elimination of the cause of the complaint will be checked by the scheme operator. The implementation and effectiveness of the elimination measures specified by the party concerned or ordered by the scheme operator may also be verified, for example, by means of a *special audit*. If a complaint is filed against the scheme operator itself, an internal audit of the measures taken as a result is carried out.

If implementation and effectiveness of measures are found to be unsatisfactory, additional measures are expected or ordered by the scheme operator until the cause of the complaint has been permanently eliminated. In the event of *serious violations* by a scheme participant, a sanction process is initiated.

Once the measures have been successfully implemented, a *progress report* is drawn up and sent to the reporting person and – where appropriate – to other parties.

In some cases, such as more complex incidents, the scheme operator may need to prepare an *interim report*. Interim reports must be created if there are more than 4 weeks between confirmation of receipt and resolution of the incident (see section 4, [14](#)).

If *major non-conformities are found*, the certification body is required:

- ✓ to inform the scheme operator within 24 hours (i.e. send the audit report in electronic form)
- ✓ to agree to corrective measures with the scheme participant and
- ✓ to define an appropriate time period or deadline by which the scheme participant has to verify implementation of the corrective measures — generally through another on-site inspection (follow-up audit within 3 months after the previous one)

A SURE confirmation of conformity (certificate) may not be issued during this period. An existing SURE certificate of conformity ceases to be valid and must be immediately suspended or even withdrawn.

The scheme participant may not supply products certified as sustainable in the period between the failed audit and the follow-up 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.

Before re-certifying a scheme participant who has previously been shown to have seriously violated the requirements of sustainability certification/one aspect of the mandatory sustainability criteria (e.g. relevant information on certification by several (voluntary) certification schemes; on mass balancing data; on audit results), the certification body must inform SURE.

## 8.4 Measures to sanction and remedy serious violations by scheme participants

The scheme operator communicates sanctions solely to the contractually bound scheme participant.

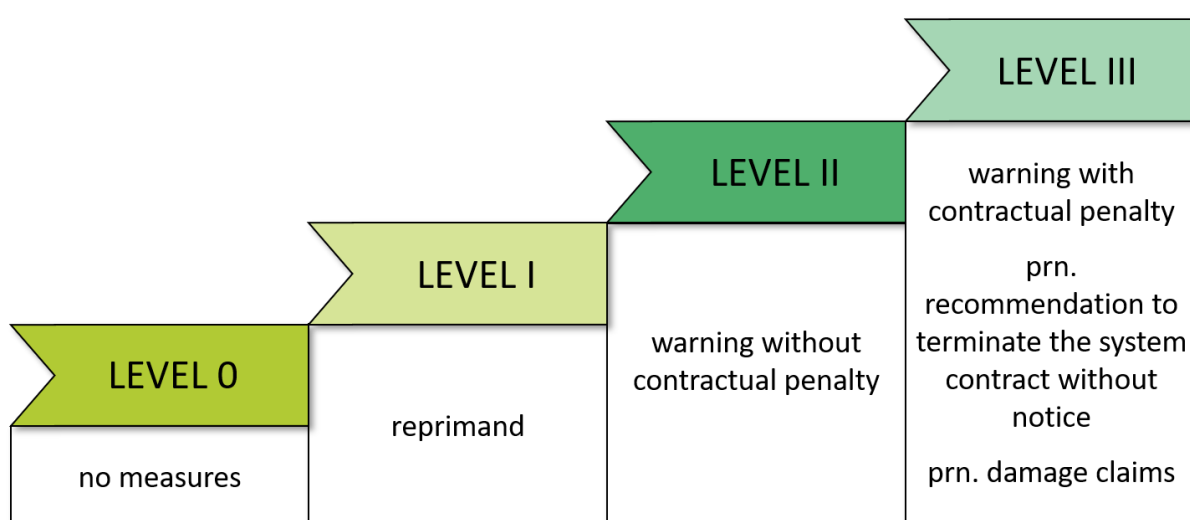
The basis for sanctions is all available evidence, in particular the findings about the violation in the audit report. The scheme participant is given the opportunity upfront to *respond* in a reasonable amount of time.

The scheme participant is responsible vis-à-vis the scheme operator for immediately remedying the problem found. However, the scheme participant is free to pursue recourse against the operating site responsible for the imposed sanctions.

As an immediate measure, a *follow-up audit* is carried out shortly thereafter by the certification body responsible.

*Internal scheme sanctions in no way replace the regulatory function of the competent authority.* It is up to the discretion of this authority to lay down its own regulatory measures for any violations found.

The *SURE sanction system* is structured into several levels:



**Figure 7:** The levels of the SURE sanction system

### ✓ *Sanction level 0*

The Sanction Committee determines that no other measures against the scheme participant are necessary.

✓ **Sanction level I**

The Sanction Committee determines that a reprimand must be issued to the scheme participant to implement the requirements of the sustainability regulations and SURE-EU system more carefully in the company.

✓ **Sanction level II**

The Sanction Committee determines that a warning shall be communicated to the scheme participant. If the problem recurs, the result is generally Sanction level III.

✓ **Sanction level III**

The Sanction Committee determines that a warning with contractual penalty shall be communicated to the scheme participant.

At Level III, a contractual fine of up to €30,000 may be imposed depending on the severity of the violations and/or the amount of damage caused by the violations and/or taking into account the advantages achieved through the illegal activities and taking into consideration the size of the operation.

It is up to the independent Sanction Committee's discretion to set the fine individually in each case.

The scheme participant has to bear the costs of pursuing legal remedies to enforce the contractual penalty.

SURE in turn is required:

- to inform the scheme participant of the Sanction Committee's decision
- to enforce the sanctions defined by the Sanction Committee with the scheme participant
- to freely decide whether to increase the frequency of audits, also for the other operating sites affiliated with the scheme participant

SURE is also required for **Sanction Level III**

- to review, at its own discretion, whether to prematurely terminate the contract
- to declare termination if necessary
- to undertake other steps to satisfy civil claims (damages)

If a scheme contract is terminated prematurely, the scheme participant in question may only join the SURE-EU system after 6 months at the earliest and subject to another review of the prerequisites.

If, as a result of a sanction, a scheme contract is terminated within the defined notice period – regardless of which side terminates – the company may *rejoin the scheme* without a waiting period only once the prerequisites have been checked.

If a certificate is withdrawn due to a critical non-conformity in the course of an audit and the scheme contract is terminated without notice in the course of the sanction procedure, the scheme participant may be excluded from system participation for at least two years. When accepting new system participants, SURE shall take into account any suspension periods of other voluntary systems.

When an economic operator previously found to be in critical or serious non-compliance applies for re-certification, the auditor shall, through its competent certification body, bring this fact to the attention of all voluntary schemes in which the economic operator participates or seeks to participate.

## 8.5 Measures to ensure the scheme integrity of certification bodies

Another important role in ensuring scheme integrity is played by approved SURE certification bodies and their auditors. For these bodies too, SURE has effective procedures in place to reduce the potential risks of scheme violations, misuse and fraud and effectively combat these kinds of tendencies. The certification bodies are required to submit all reports and necessary documents for inspection to SURE upon request.

### ✓ *Systematic monitoring of all procedures*

The SURE-EU database is used to view and analyse all certifications that have been carried out. Statistics are created for the following criteria for every certification body on an annual basis and when requested:

- compliance with the deadlines prescribed by the voluntary scheme for reporting and issuing certificates
- duration of “on-site” audits taking into account the respective scope of application

In the event of deviating or conspicuous values, the certification body in question is contacted directly and asked to undertake corrective measures. If the deviations continue, SURE can exclude the respective certification body from the voluntary scheme. In addition, the scheme operator regularly spot checks the audit reports stored in the database to ensure that:

- the reports are complete
- the reports are understandable (informative and easy to read)

- the reports are coherent (consistency between evaluation and description of facts)
- the results are plausibly presented

Criteria for random selection of certification bodies and scheme participants for internal monitoring of audit reports	
<ul style="list-style-type: none"> <li>✓ Random (all scheme participants and the certification body are subject to the SURE integrity programme/monitoring)</li> <li>✓ Indications of non-compliance or fraud</li> <li>✓ Minimum sample size: <math>\sqrt{n}</math> of audit reports stored per quarter</li> </ul>	
Risk-based criteria for the selection of scheme participants:	Risk-based criteria for the selection of certification bodies:
<ul style="list-style-type: none"> <li>✓ Place/region</li> <li>✓ Scope of application</li> <li>✓ Type of biomass</li> </ul>	<ul style="list-style-type: none"> <li>✓ Number of audits conducted per certification body</li> <li>✓ Number of audits conducted per auditor</li> <li>✓ Significant deviations from the average audit duration (25 %)</li> <li>✓ Place/region of activity</li> </ul>

**Table 1:** Criteria for random selection of certification bodies and scheme participants for internal monitoring of audit reports

If reports do not meet SURE requirements, SURE reserves the right to take further action to ensure system integrity. These may be depending on the severity of the violation:

- correction of the audit report
- follow-up training of the certification body
- requirement for auditor follow-up training
- conducting special audits
- requirement to repeat the audit
- requirement to withdraw certificate
- etc.

Unacceptable reports are sent back to the certification body for clarification and, if necessary, corrected by a specified date.

Certification bodies failing or unwilling to comply with the requirements set out in paragraphs 1 to 6 of Article 17 of the Implementing Regulation (EU) 2022/996 will be excluded from participation in SURE and from conducting audits under the SURE system.

✓ ***Systematic monitoring of the certification bodies***

All of the certification bodies active in the SURE-EU scheme are at least officially recognised or have an equivalent accreditation. In addition to the measures embedded in this recognition and accreditation process for “quality assurance”, the scheme operator has defined further requirements for certification bodies. This involves, among others:

- subject-specific registration and approval as well as deployment monitoring of inspectors
- the obligation to train the deployed auditors regularly by the certification body
- the qualification of the relevant people responsible for implementation of the “train-the-trainer” principle in each certification body by the scheme operator
- optional support of an audit and/or assessment of the certification body by own SURE assessors or assessors appointed by SURE

✓ ***The knowledge and reporting requirements of certification bodies***

Certification bodies must immediately inform SURE if a serious violation of this requirement or any other aspect of the mandatory sustainability criteria is found to exist for an economic operator who is SURE certified and wants to be recertified. This enables the SURE to take necessary steps in the integrity management system.

## 9 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.

## Annex I: Revision Information

### Revision Information Version 3.0

Section	Change	Date of change
whole document	Version 2.0 updated to 3.0	20.05.2025
whole document	Correction of minor typos	20.05.2025
whole document	Updated reference to Revised Directive (EU) 2018/2001 (RED III)	20.05.2025

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