SUSTAINABLE RESOURCES
Verification Scheme GmbH

Add-on Criteria in the SURE-EU System

Version: SSP-AoK-en-1.0
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Content

1 Introduction

The SUSTAINABLE RESOURCES Verification Scheme (SURE) is a certification scheme established in 2019 to define sustainability criteria and GHG savings requirements for the production and use of biomass for electricity and heat production. By decision of the European Commission, the SURE-EU standard is recognised for verifying compliance with the minimum requirements of the revised EU Renewable Energy Directive (Directive (EU) 2018/2001, "RED III") regarding the sustainability of biomass use for electricity or heat production and the associated GHG reduction obligations.

The sustainability criteria and GHG reduction obligations defined in RED III constitute the minimum requirements and form the basis for the implementation of management processes and environmental standards in the bioenergy sector and its associated supply chains. However, there is often a desire to demonstrate compliance with additional requirements for responsible and sustainable biomass use beyond these minimum standards.

Through the "Add-on criteria" defined in this document, SURE offers economic operators the opportunity to reliably demonstrate compliance with additional requirements for sustainable and responsible biomass use and more ambitious GHG savings than those set out in RED III, to have these verified by an independent body, and to document them through corresponding certification.

2 Implementation and Integration of Add-on Criteria in the SURE-EU System

The basis for certification of Add-on criteria is the demonstrated and certified implementation of the minimum standards specified in the SURE-EU system for sustainable biomass production and use, GHG calculation, and associated management processes in accordance with Article 29, paragraphs 2-7 and 10 of the revised Directive (EU) 2018/2001 (RED III) and applicable regulations. Amendments, additions, or revisions to the currently valid RED III shall also apply directly within the SURE-EU system and shall be implemented accordingly by economic operators.

Proof of compliance shall be a valid SURE-EU certificate covering the scope of the biomass used and the corresponding activity of the economic operator. If a claim relating to one or more Add-on criteria is sought, only biomass certified in accordance with the SURE-EU standard may be processed for the product for which the claim is made. A mass balance approach or book and claim approach is not permitted.

The requirements of the minimum standards defined in the SURE-EU system shall be considered demonstrated when the audit result shows at least 75% compliance with SURE system requirements. In addition, the respective Add-on criteria shall be confirmed in the audit result with a 100% fulfilment level of the additional criteria described in the checklist.

The auditing of Add-on criteria may be conducted simultaneously with or after an audit against the RED III minimum standards of the SURE-EU system. However, the Add-on criteria shall only become valid if the underlying standards of the SURE-EU system are also met (at least 75% audit result). If the SURE-EU certificate underlying an Add-on loses its validity (for example, through suspension, withdrawal, or regular expiry) the Add-on certificate shall automatically lose its validity as well. The Add-on certificate is fully tied to the validity of the SURE-EU certificate and shall have the same expiry date. Independently of this, the Add-on certificate may be separately suspended, withdrawn, or regularly terminated without affecting the status of the underlying SURE-EU certificate.

3 General Requirements for Add-ons

Claims of conformity with the requirements of the SURE-EU system and the Add-ons shall always be substantiated and verifiable. Where such claims are made for communication with end consumers to positively influence their decision-making, the SURE-EU system applies specific requirements for evidence-keeping and documentation to increase the reliability of the information provided and to ensure product identity in connection with the claims made.

3.1 Traceability and Product Identity

The conditions for using the Add-ons require (in deviation from the mass balance approach of the SURE-EU system) a verification system within the supply chain that ensures the traceability of the biomass or biomass fuels used while preserving the identity and characteristics of the biomass according to the subject of the claim ("identity preservation"). Depending on the content of the claim made, mixing of biomass with different characteristics under a purely mass balance attribution of these characteristics (without these characteristics applying to the biomass physically used) is therefore excluded.

Economic operators shall therefore describe and demonstrate, in a transparent and verifiable manner, the procedures and technical equipment in place to ensure the correct recording and traceability of material flows while maintaining product identity.

In addition, all economic operators shall have a document management system that can be verified during audits, in which all relevant documents and procedures are maintained and

presented during audits. Unless otherwise specified in this document, the requirements for traceability and documentation defined in the SURE-EU documents "Scheme principles for the use, processing and distribution/trade of biomass fuels and their conversion to electricity and heat" (SSP-USE) and "Technical guidance for mass balancing" (TG-MASS) shall apply.

3.2 Data Collection

Claims made under the Add-ons shall be based on equivalent information and consistent methodology. The specific methodological requirements for data collection and assessment are defined in the respective Add-on rules.

As a general principle: the collection of primary data by the economic operator is required for data collection within the SURE-EU system. Primary data are data directly measured or collected from within the operational control of the economic operator.

The use of secondary data (for example, from scientific sources, recognised databases, or officially published information) is permitted, provided this is methodologically necessary and foreseen in the respective Add-on rules. In all cases, both primary data and secondary data shall demonstrate a high level of quality, transparency, and accuracy.

Unless deviating provisions are made in the Add-on-specific rules, the methodological principles of the revised Directive (EU) 2018/2001 (RED III) and the applicable SURE-EU documents shall apply.

4 Add-on “Regional Fuel Production” (Regionale Brennstoffproduktion) –

The biomass fuel is produced exclusively from raw materials sourced within a 200 km radius of the production facility.

4.1 Background

Regionality is one of the broader sustainability criteria that appears easy for many consumers to understand yet can be interpreted differently. Examples of typical regions may include federal states, counties, or NUTS regions, as well as natural areas such as "Eifel", "Tirol", or "Provence".

SURE uses the concept of functional spaces to define the region. The region is defined by the interactions and connections between various actors and sites along the value chain, whereby a defined distance from the site of the economic operator wishing to make a claim regarding regionality shall not be exceeded under any circumstances.

4.2 Definition of “Regional Fuel Production“

The term "regional fuel production" is defined in the context of this document as follows: The region comprises an area within a radius of 200 km around a facility for which a claim regarding regional fuel production is to be made. This may be:

a) a production facility in which a fuel is produced with the characteristics with which it is delivered to the end customer, or

b) a conversion facility in which electricity and/or heat is produced.

The entire value chain shall be located within this area, from the point of raw material sourcing, through sites where the raw material is processed, to the site for which the claim regarding regional fuel production is to be made. This does not apply to additives that may be added to the raw biomass during fuel production to improve technical properties.

4.3 Requirements for the Economic Operator Wishing to Make a Claim Regarding Regional Fuel Production

The economic operator wishing to make a claim regarding regional fuel production shall meet the following requirements.

4.3.1 The economic operator is the operator of the production facility in which the fuel is processed to its final required quality level (4.2 a)) or the operator of the conversion facility in which electricity and/or heat is produced from regionally produced fuel (4.2 b)).

4.3.2 At the time of sourcing, processing, or using biomass with the attribute "regional fuel production", the economic operator shall hold a valid certificate in accordance with the SURE-EU system with the additional Add-on criterion "regional fuel production" and shall demonstrate continuous certification until the marketing of the biomass fuel with the attribute "regional fuel production" or until thermal conversion.

4.3.3 The economic operator is obliged to establish and maintain internal processes that ensure only biomass from a region meeting the requirements defined in 4.2 is sourced and processed.

4.3.4 The economic operator is obliged to document and demonstrate the distances of all upstream economic operators to the production site. The determined geocoordinates shall be recorded in the mass balance.

4.3.5 The requirements defined in 4.4.1 to 4.4.3 as well as in 4.4.5 shall be met.

4.4 Requirements for All Economic Operators in the Value Chain

All economic operators in the value chain of a biomass fuel that are certified in accordance with the criteria of the Add-on "Regional Fuel Production" (Regionale Brennstoffproduktion) shall meet the following requirements.

4.4.1 All economic operators from raw material sourcing to the operator wishing to make a claim regarding regional fuel production (see 4.2) shall, at the time of sourcing, processing, or using biomass with the attribute "regional fuel production", hold a valid certificate in accordance with the SURE-EU system with the additional Add-on criterion for regionality and shall demonstrate continuous certification until delivery of the fuel with the attribute "regional fuel production" to the downstream economic operator in the value chain or until thermal conversion.

4.4.2 All sourcing areas where biomass is harvested or points of origin where waste or residues arise, and all sites where biomass is processed or stored, shall be located within the region (see 4.2) around the company wishing to make a claim regarding regional fuel production (see 4.3). Biomass from sourcing areas/points of origin or from sites not located within the region cannot be used for a claim regarding regional fuel production and shall, where applicable, be clearly delineated in the mass balance and stored separately.

4.4.3 To comply with the criteria of the Add-on "Regional Fuel Production" (Regionale Brennstoffproduktion), it is mandatory that only biomass has been processed that meets the requirements for demonstrating regionality and is physically present in the product. This requires (unlike the mass balance approach of the SURE-EU system) the separate recording, storage, processing, and documentation of delivered biomass quantities that meet the requirements for regional fuel production from other biomass quantities that do not meet these requirements.

4.4.4 Economic operators are obliged to record the geocoordinates of the relevant sourcing areas/sites and, where applicable, to pass on the information for identifying the sourcing area/site to the respective downstream economic operator.

4.4.5 The requirements for product identity and data collection defined in 3.1 and 3.2 shall be met.

5 Add-on “Resource Efficiency” (Ressourcen-effizienz) –

The biomass fuel is produced exclusively from waste and residues, thereby contributing to resource efficiency.

5.1 Background

Biomass is a renewable but not infinitely available raw material. The use of biogenic waste or residues from biomass processing can make a significant contribution to conserving natural resources, reducing pressure on cultivation areas and sourcing areas, and preventing the relocation of cultivation or harvesting activities to sensitive regions.

5.2 Definitions of “Waste” and “Residues”

In the context of this document, the definitions of "waste" and "residues" include the following biomass types:

a) agricultural residues in accordance with the SURE-EU document "Scheme principles for the production of agricultural biomass" (SSP-AGRI), e.g. harvest residues,

b) forestry residues in accordance with the SURE-EU document "Scheme principles for the production of forest biomass" (SSP-FOREST), e.g. forest residues, thinning and salvaged wood not suitable for material use,

c) waste and residues in accordance with the SURE-EU document "Scheme principles for the generation of waste and residues from biomass" (SSP-WaR), e.g. waste and residues from the processing of agricultural and forestry biomass, landscape management material, other biomass waste, e.g. shells, sawdust, waste wood.

5.3 Requirements for Economic Operators in the Value Chain

All economic operators in the value chain of a biomass fuel that are certified in accordance with the criteria of the Add-on "Resource Efficiency" (Ressourceneffizienz) shall meet the following requirements. This includes all companies, from raw material sourcing to the production of the fuel to be marketed to end customers with a claim regarding resource efficiency, or to the production of heat and/or electricity from a fuel that meets the requirements.

5.3.1 All economic operators shall, at the time of sourcing, processing, or using biomass with the attribute "resource efficiency", hold a valid certificate in accordance with

the SURE-EU system with the additional Add-on criterion for resource efficiency and shall demonstrate continuous certification until delivery of the fuel with the attribute "resource efficiency" to the downstream economic operator in the value chain or until thermal conversion.

5.3.2 With the exception of additives that may be added to the raw biomass during fuel production to improve technical properties, all biomass used shall meet the requirements for waste and residues in accordance with 5.2.

5.3.3 The sustainability attributes of the biomass shall remain assigned to the respective physically delivered quantities at all times.

5.3.4 Deliveries of raw materials or biomass fuels that do not fall under the categories "waste and residues from biomass", "forestry residues", or "agricultural residues" in accordance with 5.2 shall not be mixed with biogenic waste or residues used for the production of biomass fuels in accordance with the requirements of the Add-on "Resource Efficiency" (Ressourceneffizienz), but shall be recorded, stored, and processed strictly separately from these.

5.3.5 The operator of the production facility in which the fuel is processed to its final required quality level, or the operator of the conversion facility, shall establish and maintain internal processes (with regard to the biomass designated in accordance with 5.2) to ensure that only biomass meeting the requirements defined in 5.2 is sourced and processed.

5.3.6 The requirements for product identity and data collection defined in 3.1 and 3.2 shall be met.

6 Add-on “Wood Fuel with Limited Carbon Footprint“ (Holzbrennstoff mit begrentztem CO_2-Fußabdruck) –

The wood fuel demonstrates high potential for GHG savings in the heat market.

6.1 Background

Climate-related data is increasingly evolving from a pure compliance requirement to a strategic factor along global value chains. Regulatory authorities, customers, financial institutions, and downstream industries demand greenhouse gas (GHG) information that is not only accurate but also usable across different reporting and management systems.

The Add-on "Wood Fuel with Limited Carbon Footprint " (Holzbrennstoff mit begrentztem CO_2-Fußabdruck) supplements the SURE-EU system with a voluntary, extended methodology for determining product-specific GHG emissions for wood fuels. By using site-specific primary data, quality-assured emission factors from recognised life cycle assessment (LCA) databases, and clearly defined system boundaries, the Add-on enables a robust assessment of climate efficiency along the entire value chain up to the factory gate. This provides a reliable basis for communication with customers and business partners and supports companies in differentiating themselves in the market through demonstrable climate efficiency.

The Add-on builds on the existing RED framework of the SURE-EU system but extends it with methodological elements aligned with internationally recognised LCA principles. It thus represents a hybrid approach: compatible with RED-based supply chains yet supplemented by selected principles of life cycle assessment for structured and transparent emissions re-porting.

The RED GHG calculation remains unaffected by this. The emission values determined under this Add-on do not replace RED calculations and do not serve as proof of regulatory mini-mum savings.

6.2 Methodological Basis

6.2.1 The GHG calculation under this Add-on is based on a hybrid methodological approach.

It builds on the existing GHG framework of the SURE-EU system for implementing the Directive (EU) 2018/2001 (RED III) and uses its structure for process-based emissions determination along the supply chain.

In addition, selected methodological principles of life cycle assessment are taken into account, particularly regarding:

- ✓ the definition of clear system boundaries,
- ✓ the transparent documentation of assumptions and data sources,
- ✓ the structured recording of material and energy flows,
- ✓ the transparent reporting of biogenic and fossil emission shares.

This represents a methodological alignment with selected principles of the standards ISO 14040, ISO 14044, and ISO 14067.

6.2.2 The calculation follows a life cycle-based inventory approach within a cradle-to-gate system framework. All relevant material and energy flows within the defined system boundaries are recorded and assessed using appropriate emission factors.

Emissions are determined on a process-specific basis and passed on along the supply chain. Each economic operator is responsible for recording the emissions arising within their operational control.

The calculation shall be transparent, consistent, and documented.

6.2.3 The methodological requirements described in this Add-on are aligned with core principles of ISO 14040, ISO 14044, and ISO 14067, particularly regarding transparency, documentation, and structuring of emission data.

However, due to the integration of RED-specific elements (particularly regarding the treatment of biogenic emissions and certain emission factors) this Add-on does not constitute an ISO-compliant product carbon footprint calculation in the sense of a full application of the aforementioned standards.

6.2.4 This Add-on supplements the RED-based GHG calculation within the SURE-EU system. It does not replace it and does not alter the regulatory requirements or verification obligations under Directive (EU) 2018/2001.

Where specific methodological options are provided in this Add-on that relate to RED-compliant supply chains, these are expressly to be understood as supplementary provisions within this hybrid approach.

6.3 System Boundaries and Functional Unit

6.3.1 The GHG calculation under this Add-on is performed within a cradle-to-gate system framework.

All GHG-relevant processes are captured, from the supply of raw materials used to the defined factory gate of the wood fuel producer. The decisive point is when the finished product leaves the production site.

The system boundary includes in particular:

- ✓ raw material supply, including any upstream processing,
- ✓ collection, storage, and transport of the biomass or residues used,
- ✓ all production processes at the site (e.g. size reduction, drying, pelletizing, cooling),
- ✓ internal material movements,
- ✓ energy input, including on-site energy generation,
- ✓ auxiliary materials or additives used,
- ✓ packaging processes, including the production and use of packaging materials where the product leaves the factory gate in packaged form.

Note: “Size reduction” covers mechanical processes such as chipping, shredding, and grinding.

The following are not part of the system boundary:

- ✓ the use of the wood fuel, in particular its combustion by the end customer,
- ✓ downstream transport and distribution processes outside the defined factory gate,
- ✓ the crediting of avoided fossil emissions or substitution effects.

The system boundaries shall be clearly defined and consistently applied.

6.3.2 The factory gate is the clearly defined point of transfer for the finished wood fuel at the production site.

This may be, for example:

- ✓ silo loading for bulk goods,
- ✓ a defined loading point,
- ✓ or the dispatch of packaged goods.

The chosen reference point shall be documented and shall not vary within a reporting period.

6.3.3 The functional unit is 1 kilogram of wood fuel at the defined factory gate of the production site. The functional unit refers to the physical product condition at the time of leaving the factory gate.

To clearly describe the functional unit, at least the following product-specific parameters shall be stated:

- ✓ Lower heating value (LHV) of the product in its delivery condition (MJ/kg),
- ✓ Moisture content of the product at the factory gate,
- ✓ Physical product form (bulk goods or packaged goods)

All GHG emissions shall be stated in grams of CO_2 equivalent per megajoule of wood fuel at the factory gate (gCO_2e/MJ), based on the declared lower heating value.

The additional reporting of a mass-based reference value (gCO_2e/kg) is permitted.

6.4 Data Sources and Emission Factors

6.4.1 The GHG calculation is based on site-specific primary data from the respective economic operators. All economic operators within the defined system boundaries are obliged to record the energy and material flows arising within their operational control completely and transparently.

The primary data shall cover a representative period of typically twelve consecutive months. Deviations shall be justified and documented.

6.4.2 Appropriate emission factors shall be used for the assessment of energy and material flows.

A fundamental distinction shall be made between site-specific primary data and background data:

Primary data comprise all activity data actually measured or documented at the site, such as the electricity consumption of a facility, the quantity of fuel used, water consumption, or material input.

The emissions associated with these activity data (such as emissions from electricity generation, water supply, or the production of an auxiliary material used) are represented through emission factors. These attributed emissions are referred to as background systems.

For such background systems, emission factors shall be used from:

- ✓ recognised and quality-assured LCA databases,
- ✓ officially published, scientifically substantiated sources,
- ✓ or equivalent, methodologically transparent datasets

The selected datasets shall be suitable in terms of geographical, technological, and temporal representativeness. The selection shall be documented and justified.

The use of non-transparent, generic, or undocumented emission factors is not permitted.

6.4.3 The use of politically defined default values or simplified emission factors from regulatory contexts is excluded under this Add-on.

6.4.4 The sourcing and assessment of electrical energy represent a significant factor influencing the cradle-to-gate GHG calculation. To ensure comparability and methodological consistency, the following requirements apply:

a) Location-based approach – Default approach

For purchased grid electricity, a location-based emission factor of the respective national or regional electricity mix shall generally be applied. The emission factor used shall originate from a recognised, quality-assured LCA database or an officially published, scientifically substantiated source.

This includes in particular the emission factors for electricity published under Implementing Regulation (EU) 2022/996. These are recognised under this Add-on as an officially published, scientifically substantiated source. The use of these factors is permitted, provided it is applied consistently and uniformly.

b) Market-based approach

A market-based emission factor may only be applied where:

- ✓ Guarantees of Origin are clearly assigned to the electricity consumption being calculated and have been demonstrably cancelled,
- ✓ no double selling or double counting occurs,
- ✓ the emission factor is technologically and geographically representative of the electricity generation procured,
- ✓ both the market-based and the location-based emission values are transparently documented.

In this case, the cradle-to-gate emission value shall be reported on the basis of the market-based approach. In addition, the emission value on the basis of the location-based approach shall be stated in the documentation.

c) Own electricity generation

For self-generated electricity, the actual emissions of the respective generation technology shall be accounted for. For electricity-generating installations based on biomass, fossil and biogenic emissions shall be reported separately.

d) Exclusion of generic zero values

An emission factor of "0 kg CO_2e/kWh" may only be applied where this is justified by a methodologically consistent data basis and is transparently documented. The mere existence of Guarantees of Origin does not justify an automatic zero value.

6.5 Allocation and Treatment of Residues

6.5.1 Where multiple energy-usable products or co-products arise in upstream or within the processes under consideration, allocation decisions shall be made. Allocation shall be avoided where possible through process subdivision or through differentiated recording of individual sub-processes. Where this is not possible, the GHG emissions caused shall be allocated on the basis of their lower heating value (LHV). Allocation shall be proportional to the energy content of the respective products.

Economic allocation is not permitted under this Add-on. The chosen method shall be applied consistently and documented transparently.

6.5.2 Where wood fuels are produced from waste or residues from wood processing, a cut-off approach may be applied to these material flows. In this case, the waste or residues enter the wood fuel producer's calculation without upstream GHG burdens. The emissions from forestry and primary wood processing remain with the respective main products of these processes.

6.5.3 However, from the point of taking possession of the waste or residue, all subsequent processes (in particular collection, storage, processing, and transport to the production site) shall be fully included in the GHG calculation.

6.5.4 The classification of a material flow as waste or residue shall be made in accordance with the provisions of the SURE system document SSP-WaR "Scheme principles for the generation of waste and residues from biomass", in particular Chapter 5. The criteria set out therein are authoritative for the application of the cut-off approach under this Add-on. No independent or deviating definition of waste or residues is made under this Add-on.

6.5.5 Where a material used is not a waste or residue within the meaning of the aforementioned SURE system document, but rather a deliberately produced co-product or an economically independent product stream, the upstream emissions shall be allocated between the resulting products according to causation.

6.6 Accounting for Biogenic Carbon

The accounting for biogenic carbon is aligned with the principles of ISO 14067. Biogenic carbon flows shall be recorded separately from fossil emissions.

6.6.1 The total emissions of the product are the sum of all emissions caused within the defined system boundaries, taking into account the characterization rules set out in this section.

This Add-on follows a hybrid approach that incorporates elements of ISO product accounting as well as regulatory principles of the RED.

6.6.2 The biogenic carbon physically contained in the wood fuel at the defined factory gate shall be determined and reported separately.

The determination shall be based on:

- ✓ the dry matter content of the product at the factory gate,
- ✓ a documented carbon content of the biomass used.

6.6.3 Where no site-specific analytical data are available, a carbon content of 0.5 kg C per kg dry matter may be used, provided this is appropriately justified. For the conversion of carbon (C) to carbon dioxide (CO_2), the stoichiometric factor 44/12 shall be applied.

The value to be reported is:

Biogenic carbon content of the product at the factory gate (g CO_2 biogenic per kilogram of wood fuel).

This value represents the quantity of carbon physically bound in the product. No emission reductions or credits may be derived from the reporting of biogenic carbon content.

6.6.4 Biogenic CO_2 emissions arising within the defined cradle-to-gate system boundaries shall be quantified.

This relates in particular to emissions from the combustion of biomass for energy purposes within the production process, for example for drying or for the generation of process heat.

6.6.5 Characterization rule for biogenic CO_2 emissions

a) Principle

Biogenic CO_2 emissions shall be reported separately from fossil emissions as a matter of principle.

b) RED-certified biomass

Where demonstrably only RED-compliant and sustainably certified biomass in accordance with the SURE-EU system is used, a characterization factor of 0 may be applied to biogenic CO_2 emissions.

In this case, biogenic CO_2 emissions enter the calculation of total emissions with a value of "0 kg CO_2 equivalent".

This provision is based on the regulatory framework of Directive (EU) 2018/2001 and represents a deliberate methodological deviation from a purely ISO-compliant assessment.

6.6.6 Changes in carbon stocks in forests or other biogenic carbon pools are not part of this cradle-to-gate calculation. No modelling of sink effects or temporary carbon storage is performed under this Add-on.

6.6.7 No emission credits may be claimed for avoided fossil emissions, substitution effects, or biogenic carbon sinks.

6.7 Reporting, Data Transfer, and Certification Requirements

The GHG calculation under this Add-on follows a cradle-to-gate approach for determining a product carbon footprint aligned with ISO principles. The calculation is based on the systematic collection, transfer, and consolidation of GHG-relevant data along the entire value chain.

6.7.1 All economic operators producing, processing, or trading wood fuels certified under this Add-on shall ensure that GHG-relevant information is properly determined, documented, and passed on to the respective downstream economic operator.

The Add-on does not replace the existing mass balance and data transfer framework of the SURE-EU system but supplements it with additional GHG information aligned with ISO principles.

6.7.2 Within the SURE-EU system, GHG determination is generally process-based. Each economic operator is responsible for the emissions arising within their operational control and transmits the corresponding information to the next interface in the supply chain. This principle also applies under this Add-on.

Each upstream economic operator shall:

- ✓ determine the GHG emissions of their own processes within the defined system boundaries,
- ✓ use site-specific activity data and appropriate emission factors in accordance with this Add-on,
- ✓ document assumptions, data sources, and allocation decisions transparently,
- ✓ pass on the determined emission values together with the certified material to the downstream economic operator.

6.7.3 The last economic operator in the supply chain placing the wood fuel on the market under this Add-on is responsible for:

- ✓ the collection and plausibility check of the GHG data transmitted by upstream companies,
- ✓ the performance of the complete cradle-to-gate GHG calculation for the final product,
- ✓ the consistent integration of all upstream emission data into a consolidated product carbon footprint,

- ✓ ensuring methodological consistency across all process stages.

6.7.4 The responsibility for the accuracy and completeness of the reported cradle-to-gate emission value lies with the economic operator placing the wood fuel on the market with the attribute of this Add-on.

6.7.5 For the certified wood fuel at the defined factory gate, at least the following indicators shall be reported:

- ✓ Lower heating value (LHV) of the product in its delivery condition (MJ/kg),
- ✓ Fossil GHG emissions (g CO_2 equivalent per MJ),
- ✓ Biogenic GHG emissions (g CO_2 equivalent per MJ),
- ✓ Total cradle-to-gate GHG emissions (g CO_2 equivalent per MJ),
- ✓ Biogenic carbon content of the product at the factory gate (g biogenic CO_2 per kilogram of product),
- ✓ Description of the system boundaries applied,
- ✓ Indication of the allocation method applied,
- ✓ Sources of the emission factors and background data used,
- ✓ Reporting year and a reference period of the primary data used.
- ✓ Where a market-based electricity approach is applied, this shall be explicitly indicated in the report.

All information shall clearly refer to the declared functional unit.

6.7.6 To ensure the usability of the results in downstream applications, the GHG emissions shall be presented in disaggregated form.

At a minimum, the following process modules shall be reported separately:

- ✓ Raw material supply and transport,
- ✓ Production processes at the site (including drying, processing, and pelletizing),
- ✓ On-site energy generation,
- ✓ Packaging processes, where applicable,
- ✓ Other relevant emission-causing processes.

This modular structure enables the integration of results into downstream product calculations, company-level GHG inventories, and reporting systems.

6.7.7 All methodological decisions, assumptions, emission factors, allocation rules, and data foundations shall be fully and transparently documented. The documentation must enable an independent review of compliance with this add-on.

6.7.8 The GHG values determined under this Add-on shall be clearly distinguished from GHG values calculated for RED conformity purposes. Mixing or replacing RED values with ISO-based values is not permitted.

6.8 Verification and Certification Requirements

6.8.1 The GHG calculation performed under this Add-on is subject to review by independent auditors as part of the regular SURE certification process.

6.8.2 The subject of the review shall include in particular compliance with the methodological requirements of this Add-on, the completeness and plausibility of the activity data and emission factors used, as well as the consistency of the calculation and reporting along the defined system boundaries.

6.8.3 Verification under this Add-on does not constitute ISO certification and does not establish any entitlement to certification under ISO 14040, ISO 14044, or ISO 14067. Likewise, it does not establish any entitlement to a product-related ISO label.

6.9 Qualification criterion for the Add-on “Wood fuel with limited carbon footprint"

6.9.1 To use the Add-on, it shall be demonstrated that the total emissions of the wood fuel reported in accordance with Section 6.7.5 do not exceed the following reference value:

7.0 g CO_2 equivalent per MJ of wood fuel (LHV) at the factory gate.

The assessment is based on the characterization rules applied in accordance with Section 6.6.

6.9.2 The reference value relates to the declared functional unit in accordance with Section 6.3. The demonstration shall be provided for the reporting period defined in accordance with Section 6.4.1.

6.9.3 The emission value shall be stated to one decimal place. Exceeding the reference value (even marginally) means that the wood fuel may not be placed on the market with the attribute of this Add-on.

6.9.4 Failure to meet the qualification criterion does not affect the RED conformity of the wood fuel within the SURE-EU system. Regulatory certification in accordance with Directive (EU) 2018/2001 remains unaffected.

7 Requirements for Certification Bodies and Auditors

In addition to the provisions set forth in the applicable SURE-EU document “Scheme Principles for the Certification Process,” the specific requirements defined below apply to activities conducted as part of the voluntary SURE Add-on certification.

7.1 Requirements for Certification Bodies

A fundamental prerequisite for the registration of certification bodies for activities under the voluntary SURE add-on, in accordance with the system document “Add-on Criteria in the SURE-EU System” (SSP-AoK), is a successful registration for certification activities under the SURE-EU system.

For details on the registration process, refer to the SURE-EU document “Scheme Principles for the Certification Process.”

7.2 Requirements for auditors

A fundamental prerequisite for registering an auditor to perform activities under the voluntary SURE Add-on, in accordance with the system document “Add-on Criteria in the SURE-EU System” (SSP-AoK), is a successful registration as a SURE-EU auditor (see SURE-EU Scheme Principles for the Certification Process)

Auditors shall meet the requirements for verifying greenhouse gas calculations based on actual values (SURE-EU Scope ID 7002) and be confirmed by SURE for this purpose.

For the registration process, refer to the SURE-EU document “Scheme Principles for the Certification Process.”

8 Associated Documents

Associated documents are all documents of the SURE-EU system in their respectively valid version, in particular

- ✓ GSP-Basic: Scope and basic scheme requirements of the SURE system
- ✓ GSP-CP: Scheme principles for the certification process
- ✓ GSP-IMS: Scheme principles for integrity management
- ✓ SSP-AGRI: Scheme principles for the production of agricultural biomass
- ✓ SSP-FOREST: Scheme principles for the production of forest biomass
- ✓ SSP-WaR: Scheme principles for the generation of waste and residues from biomass
- ✓ SSP-USE: Scheme principles for the use, processing and distribution/trade of biomass fuels and their conversion to electricity and heat
- ✓ TG-DEF: Definitions in the SURE system
- ✓ TG-MASS: Technical guidance for mass balancing
- ✓ TG-GHG: Technical guidance for greenhouse gas calculation

SURE reserves the right to create and publish additional supplementary system documents as required.

The respectively valid versions of the SURE-EU documents are published on the SURE homepage at www.sure-system.org.

The methodological principles of this Add-on are aligned with selected principles of the following international standards:

- ✓ ISO 14040:2006 – Environmental management – Life cycle assessment - Principles and framework
- ✓ ISO 14044:2006 – Environmental management – Life cycle assessment – Requirements and guidelines
- ✓ ISO 14067:2018 – Greenhouse gases – Carbon Footprint of products –Requirements and guidelines for quantification

These standards are cited as supplementary information sources for understanding the underlying accounting principles. Full application of these standards is not required under this Add-on. Compliance with the requirements set out in Section 6 is authoritative.

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