



SUSTAINABLE RESOURCES
Verification Scheme GmbH

Technical guidance for the assessment of the risk of unsustainable production of forest biomass

Version: TG-RA-en-3.0

Date: May 20th, 2025

Valid from: May 21st, 2025

© SUSTAINABLE RESOURCES Verification Scheme GmbH

This document is publicly accessible at: www.sure-system.org.

Our documents are protected by copyright and may not be modified. Nor may our documents or parts thereof be reproduced or copied without our consent.

Document title: Technical guidance for the assessment of the risk of unsustainable production of forest biomass

Version: TG-RA-en-3.0

Date: May 20th, 2025

Valid from: May 21st, 2025

Contents

1	Background of the risk-based approach.....	5
2	The risk-based approach in the SURE-EU system.....	7
2.1	Methodology of the risk-based approach in the SURE-EU system	7
2.2	Implementation of the risk-based approach in the SURE-EU system	9
2.2.1	The self-declaration and the self-statement.....	11
3	Validity and recognition of risk assessments.....	12
4	Guide to creating and evaluating risk assessments in the SURE-EU system.....	13
4.1	Information on the author of the risk assessment.....	13
4.2	Definition of the scope of the risk assessment	14
4.2.1	Identification of the scope of application by means of a polygon.....	14
4.3	Description of the structure of the forestry and wood processing industry	15
4.4	Review of the sustainability criteria for forest biomass as per Article 29 (6) RED III in the risk assessment.....	16
4.4.1	Step 1: Identification of applicable laws	16
4.4.2	Step 2: Description of enforcement and monitoring.....	19
4.4.3	Step 3: Evaluation of the effectiveness of the legal framework.....	20
4.5	Review of the sustainability criteria for forest biomass as per Article 29 (7) RED II in the risk assessment.....	22
5	Assessment of the sustainability criteria.....	23
5.1	Extract from publicly available source for indicator values	23
5.2	Sources for indicator values	24
5.3	Overview of indicators of sustainability criteria for forest biomass	25
5.4	Legality of wood harvesting.....	26
5.5	Forest regeneration	27
5.6	Preservation of biological diversity	28
5.7	Preservation of soil quality	29
5.8	Regulations for protected areas	30
5.9	Regulations for particularly valuable landscapes, where restrictions on harvesting forest biomass apply.....	31
5.10	Maintenance of the long-term production capacity of the forest.....	33
5.11	Guarantee of carbon sequestration parity.....	34

6	Evaluation of the risk assessment.....	36
6.1	Evaluation of the assessment area as a low-risk area.....	36
6.2	Evaluation of the assessment area as a specified-risk area	37
6.3	Evaluation of the effectiveness of the legal framework in step 3.....	37
6.3.1	Prerequisite for the evaluation of a sustainability criterion as category A ...	38
6.3.2	Prerequisite for the evaluation of a sustainability criterion as category B ...	38
6.3.3	Prerequisite for the evaluation of a sustainability criterion as category C ...	38
6.3.4	Overview of the classification of sustainability criteria of forest biomass	39
7	Recognition of the risk assessment by SURE	39
8	Relevant documents	40
9	References	41
	Annex I: Template for the assessment of the risk of unsustainable production of forest biomass.....	43
	Annex II: Revision Information	43

1 Background of the risk-based approach

The Revised Directive (EU) 2018/2001 (RED III) defines the sustainability requirements for, among other things, biomass fuels from forest biomass, which are referred to in this document as sustainability criteria for forest biomass. Compliance with these requirements can be demonstrated by means of a risk-based approach. This document summarises all background information on this risk-based approach and describes the information necessary for the practical implementation of the risk-based approach.

In order to ensure that, despite the increasing demand for forest biomass in the energy sector, wood harvesting is sustainable as per Revised Directive (EU) 2018/2001, the risk-based approach must also ensure that forest management upholds the principles of sustainable forest management.

These include, in particular:

- ✓ Guarantee of forest regeneration
- ✓ Preservation and maintenance of particularly valuable landscapes and areas designated as protected areas
- ✓ Preservation of biodiversity and soil quality
- ✓ Guarantee of carbon sequestration parity
- ✓ Guarantee of the long-term production capacity of the forest

The risk-based approach for forest biomass in the SURE-EU system assesses whether the required sustainability criteria are already sufficiently implemented through national or sub-national legislation in the biomass sourcing area (including but not limited to the 'country of harvest'), and whether they are being efficiently verified and, if necessary, sanctioned. If the assessment concludes that the sustainability criteria are already reflected in the relevant forest management legislation and that the laws are reliably enforced and monitored, the risk that the biomass was taken from unsustainably managed forests is considered low.

In this document, *risk* is defined as the possible negative outcome of a planned goal, which is associated with disadvantages, loss or damage.¹ The aim of the risk-based approach in the SURE-EU system is to obtain forest biomass from sourcing areas where the principles of sustainable forest management are upheld in accordance with the requirements of the criteria laid down in RED III in Article 29 (6) and (7) and in accordance with the requirements of the SURE-EU system. In *the SURE-EU system, sustainable* forest biomass means biomass for which it can be ensured that

- ✓ the forest biomass has been legally harvested, processed and traded/distributed in accordance with national legislation and international conventions,
- ✓ areas designated by international or national legislation or by the competent authority as nature conservation areas, including wetlands, grassland, heathland and peatland, are protected, with the aim of preserving biodiversity and preventing habitat destruction,
- ✓ forest biomass is harvested in compliance with the restrictions that apply to valuable landscapes, i.e., land with high biodiversity value, wetland and peatland status in reference to the cut-off date,
- ✓ harvesting is carried out considering maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact
- ✓ forest is continuously regenerated on the harvested areas,
- ✓ the long-term production capacity of the forest is maintained And
- ✓ installations producing biomass fuel from forest biomass issue a statement of assurance that the biomass is harvested in compliance with the restrictions that apply to the above mentioned valuable landscapes.

In addition, sustainable forest biomass must fulfil the criteria of Article 29 (7) in RED III on land use, land-use change and forestry (LULUCF), for which proof must be provided that

- ✓ the country of origin is a Party to the Paris Agreement and
- ✓ has submitted an Intended Nationally Determined Contribution (NDC) to the United Nations Framework Convention on Climate Change (UNFCCC) covering emissions and reductions of greenhouse gases from agriculture, forestry and land use and ensuring that any change in carbon stocks associated with biomass harvesting is counted towards the country's commitments to reduce or limit greenhouse gas emissions as specified in the national contribution or
- ✓ that national or sub-national laws are in place, in accordance with Article 5 of the Paris Agreement, to maintain and enhance carbon stocks and sinks in the harvesting area over a relevant reference period and to provide evidence that emissions reported for the LULUCF sector do not exceed emission reductions.

Proof that only sustainable forest biomass that meets the requirements of RED III is used can be provided through voluntary schemes such as the SURE-EU system.

The risk-based approach outlined in Revised Directive (EU) 2018/2001 (RED III) is implemented in the SURE-EU system by means of a dedicated risk assessment. *Risk assessment* is the

systematic process of assessing potential risks that may be associated with an activity or undertaking². The risk assessment aims to minimise the probability that unsustainable forest biomass is sourced using a structured approach.

2 The risk-based approach in the SURE-EU system

2.1 Methodology of the risk-based approach in the SURE-EU system

In the risk assessment of the SURE-EU system, the risk that the respective ‘harvesting-’ and ‘LULUCF criteria at national or sub-national level’ of RED III and the SURE-EU system (which are referred to in this document as ‘sustainability criteria’) are not met in the area where the forest biomass is sourced is objectively assessed in a *three-step process*.

In the risk assessment, steps 1 and 2 (identification of applicable laws and description of law enforcement and monitoring) must be carried out to determine the *risk status* as *low-risk* or *specified-risk* so that the results can be used to determine conformity with the requirements of the SURE-EU system and RED III.

Step 3 can optionally be used in risk assessments with a low-risk status to determine the *risk level*. The aim is to assess the effectiveness of the legal framework identified in steps 1 and 2 by identifying indicators. The risk level affects which producers are selected for sample inspections as part of the scheme audit of the group manager. Similarly, this has to be applied in a second-party audit by the first gathering point.

The assessment of the individual criteria using indicators in step 3 also determines the *depth of the inspection* in the sample inspection.

Leading questions on the three-step process:

1) *Step 1: Identification of applicable laws*

Are the requirements for sustainable forest management defined in RED III and the SURE-EU system implemented by national or sub-national legislation within the scope of the risk assessment?

2) *Step 2: Description of legal enforcement*

Have the legal provisions identified within the scope of the risk assessment been put into practice and is their implementation monitored?

3) Step 3: Evaluation of effectiveness in low-risk areas (optional)

Has the effectiveness of the legal framework identified in steps 1 and 2 been documented for the individual sustainability criteria by identifying and evaluating indicators?

The risk assessment of the SURE-EU system also reviews the criteria stipulated in Article 29 (7) of RED III.

If the degree of compliance with the respective sustainability criteria has been established in steps 1 and 2 as specified in the SURE-EU system, the area covered by the scope of the risk assessment – depending on the result of the subsequent evaluation of the results – can be classified as follows:

- ✓ The area is an area with a *low risk* of unsustainable forest management (low-risk area). The requirements for transposition into applicable law and for law enforcement and monitoring are *fulfilled* for all sustainability criteria.
- ✓ The area is an area with a *specific risk* of unsustainable forest management (specified-risk area). The requirements for transposition into applicable law and for law enforcement and monitoring are deemed to be *unfulfilled* for at least one sustainability criterion.

The classification of the assessment area as a *low-risk* area means that the principles of sustainable forest management specified in RED III and the SURE-EU system are covered by legislation, monitored and sanctioned in the event of non-compliance.

In assessment areas classified as *specified-risk* areas, the principles of sustainable forest management as outlined in RED III and the SURE-EU system are not fully implemented for at least one sustainability criterion. In this case, compliance with the requirements for forest biomass must be verified in the area where the biomass was sourced for those sustainability criteria that are not fully implemented or found to be unsubstantiated in the risk assessment in accordance with the SURE document “Scheme principles for the production of forest biomass” of the SURE-EU system.

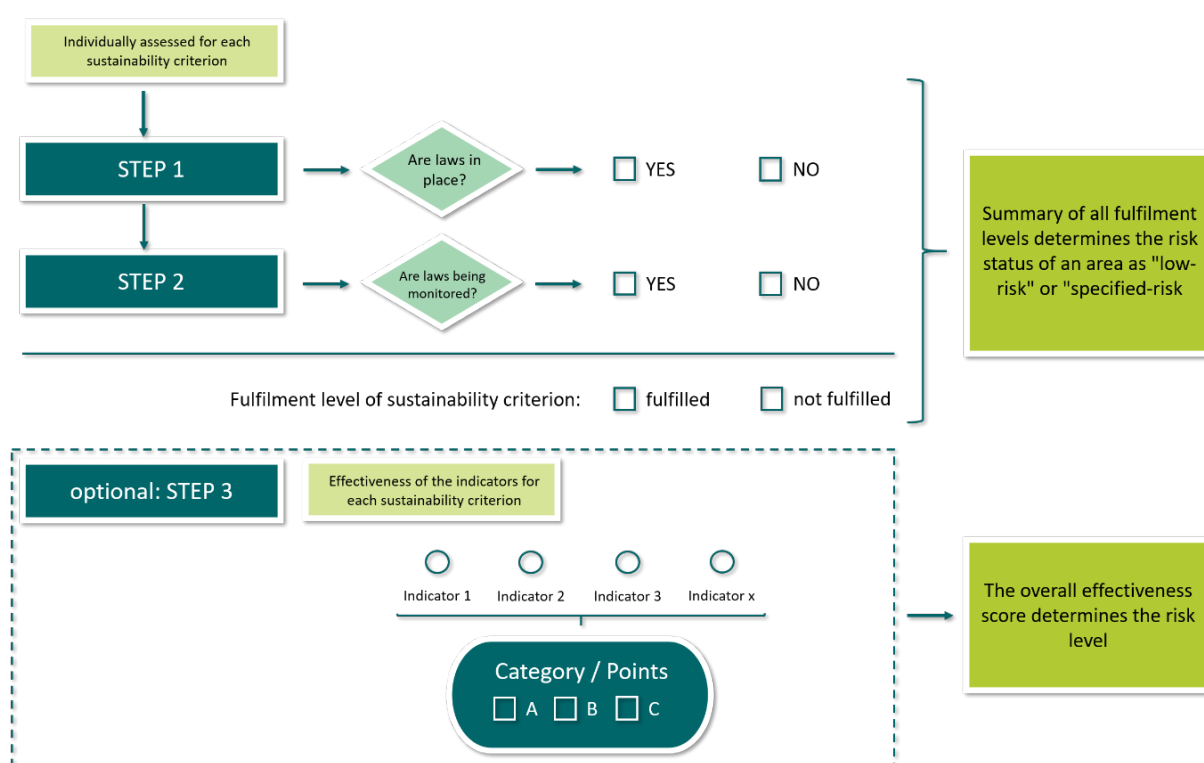


Figure 1: Schematic diagram of the risk-based approach in the SURE-EU system

2.2 Implementation of the risk-based approach in the SURE-EU system

Risk assessments are used in the SURE-EU system to determine how high the risk of unsustainably produced forest biomass is in a defined region. The principles of sustainable forest management according to the following sustainability criteria have been implemented in many countries and are enshrined in sectoral legislation:

- ✓ Legality of harvest, trade/distribution and transport
- ✓ Guarantee of forest regeneration
- ✓ Protection of designated protected areas, including wetlands, grassland, heathland and peatlands
- ✓ Preservation and maintenance of particularly valuable landscapes, i.e. high biodiversity land, wetlands and peatlands.
- ✓ Preservation and promotion of biological diversity
- ✓ Maintenance of soil quality
- ✓ Maintenance of the long-term production capacity of the forest

- ✓ Maintenance of at least carbon sequestration parity in the sourcing area

For this reason, when drawing up risk assessments in the SURE-EU system, the implementation of the sustainability criteria in the law applicable in the respective country is compared and their legal enforcement and monitoring reviewed. Compliance with the sustainability criteria shall be proven through submitting evidence demonstrating that the applicable legislation for each of the criteria has been followed. Examples of the type of evidence to be provided for each of the sustainability criteria are described in the subsections of this document.

If the risk assessment concludes that there is a low risk of non-sustainable forest management in the area where the forest biomass is sourced because the criteria are already regulated by law, monitored by the authorities and sanctioned accordingly in the event of non-compliance, the forestry operation is *not subject to certification* under the requirements of the SURE EU scheme. In this case, under the SURE-EU system, there are two options to prove compliance:

- 1) *First- or Second-party audit.* Pursuant to Revised Directive (EU) 2018/2001, only in the case that the sourcing area is evaluated as low-risk, internal or supplier audits (first- and second- party audits respectively) up to the first gathering point may be used to prove compliance.

In the case of first-party audits or self-assessments, forest biomass producers must provide a *self-statement* as proof of compliance with SURE-EU system requirements to the first gathering point (Figure 4) which will be inspected during the SURE-EU audit of the first gathering point.

In the case of second-party audit, by the first gathering point, the SURE-EU checklist for forest biomass can be used. The document is available at www.sure-system.org.

As part of their audit, first gathering points are obliged to prove

- a) whether the requirements for a supplier audit or for accepting self-statements as part of a first-party audit (e.g. valid low-risk assessment of the sourcing area) are met and
- b) whether conformity with the RED III requirements has been demonstrated by the suppliers.

Further details on the requirements for the first gathering points audits can be found on the document “Scheme principles for the certification process”.

- 2) *Sample inspections.* In the case that the group manager is different from the first gathering point, sample inspections to the forest biomass producers have to be conducted to prove compliance, as part of the scheme audits of the group manager (Figure 6). They can also be used as an alternative to first- and second-party audit. In this case, the producer must submit a signed *self-declaration* to the group manager that

- ✓ at the time the biomass is harvested, an up-to-date and recognised risk assessment is available for the forest biomass sourcing area,
- ✓ the scope of the risk assessment fully covers the sourcing area and
- ✓ exhibits a *low risk* of unsustainable forest management in the sourcing area.

If the risk assessment concludes that one or more of the harvesting and LULUCF criteria of RED III or the SURE-EU system are not or are not fully regulated or enforced at national or subnational level, or if there is no corresponding documentation, the region in question is considered a region with a specific risk (“specified-risk”) in which the ‘harvesting-’ and ‘LULUCF criteria at sourcing area level’ apply. That means that the harvesting or LULUCF criteria for which a specified risk was identified in the risk assessment must be verified in a neutral inspection in the sourcing area according to the SURE-EU scheme principles for the “production of forest biomass”. In this case, the producer must submit a signed self-declaration to the group manager confirming that

- ✓ at the time the biomass is harvested, an up-to-date risk assessment is available for the forest biomass sourcing area,
- ✓ the scope of the risk assessment fully covers the sourcing area, and
- ✓ there is a specified risk of unsustainable forest management in the sourcing area.

All producers that supply forest biomass from sourcing areas found to have a “specified-risk” in the risk assessment and that have submitted a self-declaration are inspected on site as part of the audit of the group manager for conformity with the SURE scheme principles for the production of forest biomass.

2.2.1 The self-declaration and the self-statement

Under the risk-based assessment, two key documents operate as proof of conformity for the forest biomass producers: the self-statement in the case of first-party audits, and the self-declarations (both for low and specific risks) in the cases of inspections.

Both documents are available on the SURE website at www.sure-system.org.

These forms can be used for every individual consignment or all consignments arising from an agreement or contract. If the self-declaration or self-statement is used for all consignments in an agreement or contract, the contract number or agreement number must be indicated on the self-declaration or self-statement.

It is also possible to incorporate the same wording in the self-declaration or self-statement as text in the contract between the group manager and the biomass producer.

The self-declaration or self-statement are valid for one year, starting from the date of issue, and apply to each quantity of forest biomass supplied during its period of validity.

The relevant documents proving compliance with the requirements, in particular the documentation on the location of the area where the forest biomass was sourced, must either be available to the group manager or be available at any time from the producer for the purpose of neutral inspection – also independently of an ongoing certification process of the group manager. This includes in particular:

- ✓ clear and verifiable information to identify the area and location of the sourcing area, e.g. by means of geographical coordinates, a polygon or similar verification of the area via field blocks, plots or parcels, or politically defined regions such as county, state or national borders
- ✓ a clear reference to the relevant risk assessment, including title, source, creation date and validity period and a copy of the risk assessment
- ✓ a valid self declaration or self-statement (copy or original)

All of the documents in the document management system must be kept for at least 5 years regardless of any other legal requirements relating to retention period.

In the self-declaration only, the biomass producer also confirms and accepts that, within the scope of audits by the group manager to whom the producer supplies sustainable biomass, inspections can be performed by the voluntary scheme or the executing certification body.

3 Validity and recognition of risk assessments

In the SURE-EU system, risk assessments published by the European Commission, by competent ministries of the individual federal states or by other qualified organisations can be recognised if they contain all the necessary sustainability criteria and the outcome is “low-risk” or “specified-risk”.

In addition, independent third parties who are not directly involved in the verification process (such as associations, institutions, authorities, etc.) may draw up their own risk assessments as described in this document.

The risk assessments used shall be verified by the inspectors as part of the verification of compliance with the requirements of the SURE-EU system at the time of the inspection of the economic operator.

Risk assessments can be reviewed and recognised by the SURE-EU system if provided in English language. They are then made available on the SURE website to all market participants, unless explicitly prohibited by the authors of the risk assessment.

Risk assessments are recognised in the SURE-EU system for a maximum period of 5 years and must be updated after their validity expires.

4 Guide to creating and evaluating risk assessments in the SURE-EU system

The guidance described in this section serves as an aid for drawing up and evaluating risk assessments in the SURE-EU system. To that end, authors of risk assessments should use legal assessments and reports prepared by the European Commission, international or national governmental organisations, including information provided by non-governmental and scientific forest expert organisations.

The following information needs to be provided.

4.1 Information on the author of the risk assessment

The author of the risk assessment must have expert knowledge of the forestry conditions in the region in question. For this reason, the author must provide information on the personal background. The information must include information on the author's professional background, training/education and other relevant qualifications to demonstrate the *author's suitability* to carry out the risk assessment properly.

The risk assessment shall be undertaken by in-country expert organisations (e.g. competent ministries, qualified national-level organisations or associations, independent bodies specifically set up to undertake the risk assessment etc) and not by individual economic operators. The author must not be involved in the verification process.

If a risk assessment is written by several authors, this information must be provided for the author responsible for finalising the content of the risk assessment.

4.2 Definition of the scope of the risk assessment

The scope of application is defined on the one hand by the *validity period of the risk assessment* and by the *region* for which the sustainability risk is being evaluated.

The geographical scope of the risk assessment must be defined and clearly identifiable by specifying a polygon or by clearly designating a geographical area, for example, by referencing a country's political borders. If, for the scope of the risk assessment, there is other proof of areas for field blocks, plots or parcels comparable to the polygon and which identify the exact location of the area, these can also be used to delimit the scope of the risk assessment.

In order to use the risk-based approach in the SURE-EU system, the geographical location of the area where forest biomass is sourced must be documented and compared with the scope of the risk assessment. Existing risk assessments may only be used in the SURE-EU system if the area where the forest biomass is sourced lies completely within the scope of the risk assessment.

4.2.1 Identification of the scope of application by means of a polygon

The polygon must be drawn in geographic coordinates with a resolution of 20 metres for each individual point.

In connection with the creation of the polygon, it is also possible to approximate the actual shape of the field with a polygon (in the most basic case with a triangle) for reasons of practicality. The respective start and end points of these lines delineating the polygon satisfy the accuracy requirements for the individual points above. The approximation using a polygon can be created with relatively few points provided that the resulting field area does not deviate any more than 10% from the officially determined field area.

If the geo-coordinates of the individual points are not available in table form, they can be identified on the basis of tools such as Google Earth in such a way that the individual points are positioned manually as location markers (distinct, unique points that mark the border of the property) and the results (geo-coordinates) read and documented for the location markers.

As another application option for the polygon, the entire usable forestry area of a clearly defined region can also be used as a basis to simplify matters and then captured in a single polygon as long as there are no partial areas on the total area where no biomass may be grown as defined in Revised Directive (EU) 2018/2001.

4.3 Description of the structure of the forestry and wood processing industry

The description of the structure of the forestry and wood processing industry is based on a summary of its most important *indicators in the assessment area*. The aim is to obtain a general overview of the regional characteristics and the importance of the forestry and wood processing industry in the region under review in the risk assessment. This information allows the subsequent results of the risk assessment to be linked to regional conditions and characteristics and interpreted. All data and statistics included in the description of the forestry and wood processing industry must be clearly and verifiably substantiated by stating the source and date at the end of the section or in footnotes.

In particular, key indicators and statistics from the forestry industry, wood volume, wood use and the wood processing industry must be taken into account. As a source of information, national forest reports compiled during national forest inventories and accompanied by additional explanations can be used, for example.³

Key indicators for the forestry industry:

- ✓ Total forest area in the region being assessed [ha, percentage]
- ✓ Percentage of deciduous and coniferous tree species [percentage]
- ✓ Predominant forest types and tree species in the region being assessed
- ✓ Forest ownership structures in the region being assessed [ha, percentage]
- ✓ Identification of all protected areas that protect forests in the region in question
- ✓ Portion of forest under protection [ha, percentage]
- ✓ CITES-listed (*Convention on International Trade in Endangered Species of Wild Fauna and Flora*) wood species occurring in the region in question
- ✓ Damaging events in the forest such as calamities, fires, storms, droughts [indicate year or period, extent of damage in m³]
- ✓ Forest rejuvenation [percentage: natural rejuvenation, seeding, planting, coppicing]
- ✓ Long-term forest development programmes in the region in question
- ✓ Percentage of certified forests [PEFC (*Programme for the Endorsement of Forest Certification*), FSC (*Forest Stewardship Council*)]

Key indicators for wood use:

- ✓ Total timber stock in the area in question [m³]

- ✓ Growing stock per hectare [m^3/ha]
- ✓ Net annual increment [m^3/year]
- ✓ Growth per hectare [$\text{m}^3/\text{year} \cdot \text{ha}$]
- ✓ Total wood volume in the area in question [m^3]
- ✓ Wood use [percentage, m^3]
- ✓ Data on illegal logging [economic damage, m^3]

Key indicators for the wood processing industry:

- ✓ Number of operations in the forest and wood cluster or in the sawmill industry, the wood product industry and the pulp and paper industry [absolute]
- ✓ Employees in the forest and wood cluster or in the sawmill industry, wood product industry and pulp and paper industry [absolute]
- ✓ Sales in the forest and wood cluster or in the sawmill industry, wood product industry and pulp and paper industry [euros]
- ✓ Structure of the sawmill industry [annual cutting capacity in m^3]
- ✓ Structure of the wood product industry [wood use in m^3]
- ✓ Structure of the pulp and paper industry [wood use in m^3]
- ✓ Structure of wood use for energy purposes [wood use in m^3 , percentage of electricity and heat production, employees, sales]

4.4 Review of the sustainability criteria for forest biomass as per Article 29 (6) RED III in the risk assessment

A fundamental element of the risk assessment is the extent to which the principles of sustainable forest management *are enshrined and enforced in sectoral legislation* in the region in question. To this end, the sustainability criteria for forest biomass are evaluated in a three-step process to determine whether they are implemented in sectoral legislation and if they are monitored and enforced.

4.4.1 Step 1: Identification of applicable laws

For each of the following sustainability criteria, the scope of the risk assessment must include identification of the *applicable legislation at national or sub-national level* in which the sustainability criterion is legally enshrined and implemented. This should include the name,

source and date of the entry into force of the legislation and a verifiable reference to the section of the legislation in which the equivalent requirement of RED III is addressed, if necessary, referencing the paragraph and section.

The valid legislation must be identified for the following sustainability criteria at a minimum:

✓ ***Legality of harvest, trade/distribution and transport***

The legality of harvesting operations must be ensured by demonstrating compliance of harvesting with the applicable legislation in the country of harvest, as set out in point (h) of Article 2 of Regulation (EU) No 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market.

✓ ***Guarantee of forest regeneration***

The identified laws have to demonstrate that they require natural or artificial regeneration, or a combination of both, aiming at the establishment of a new forest in the same area and within an appropriate time period according to the relevant national legislation, and that there is no biodiversity degradation in the regenerated forest area, including that primary forests and natural or semi-natural forests are not degraded to or replaced with plantation forests.

✓ ***Protection of designated protected areas, including wetlands, grassland, heathland and peatlands***

The applicable laws have to ensure an efficient protection of areas designated by international or national law, or by the relevant competent authority, for nature protection purposes, including areas being defined in wetlands, grassland, heathland and peatlands.

✓ ***Preservation and maintenance of particularly valuable landscapes, where restrictions on biomass harvesting apply***

The legal framework applicable in the area of harvest has to ensure that forest biomass does not stem from land with the status of primary and old growth forest, natural highly biodiverse grassland, heathland and wetland. In addition, the requirements to harvest biomass on other valuable landscapes, i.e. highly biodiverse forest, non-natural highly biodiverse grassland and peatland, have to be set by law.

✓ ***Preservation and promotion of biological diversity***

Impacts on biological diversity have to be minimized by demonstrating that the applicable laws, including relevant forest management rules, ensure the protection of species and habitats including those protected by international or national law. Primary forests and areas protected under Article 3.1 (b) (iii) of the “EU Commission

Implementation Regulation on establishing operational guidance on the evidence for demonstrating compliance with the sustainability criteria for forest biomass” laid down in Article 29 of the Revised Directive (EU) 2018/2001 of the European Parliament and of the Council shall not be degraded to or replaced by plantation forests, which may include, but should not be limited to, safeguarding that the regenerated forest area provides for a locally appropriate and adequate amount of plants and tree species.

✓ ***Maintenance of soil quality***

Impacts on soil quality have to be minimized by demonstrating that the applicable laws, including relevant forest management rules, ensure, during the harvesting operations, the protection of soils and regulate the removal of stumps, roots, deadwood, and where appropriate, needles or leaves.

✓ ***Maintenance of the long-term production capacity of the forest***

The applicable laws identified need to demonstrate that the long-term production capacity of the forest is maintained or increased, by ensuring that the forest harvesting does not exceed the annual growth on average, except in cases where it is temporarily justified due to documented forest pests, storms or other natural disturbances; and that it does not hamper the forest’s health and the related ecosystem services. The maintenance of the long-term production capacity may be proven by using:

- national forest inventory reports;
- providing the evidence referred to in Article 5 (ii) of “EC Implementing Regulation on establishing operational guidance on the evidence for demonstrating compliance with the sustainability criteria for forest biomass” laid down in Article 29 of the the Revised Directive (EU) 2018/2001 of the European Parliament and of the Council; or
- similar inventory reports at sub-national level.

✓ ***Statement of assurance by installations producing biomass fuel from forest biomass that the forest biomass is harvested in compliance with the restrictions that apply to the above-mentioned valuable landscapes***

According to the Revised Directive 2018/2001, not only forest biomass producers have to demonstrate that forest biomass does not arise from land where no biomass may be harvested, but also the processing plants that use forest biomass must do so. Specifically, RED III requires that the installations producing biomass fuel from forest biomass issue a statement of assurance that the biomass is harvested in compliance with the restrictions that apply to the above-mentioned valuable

landscapes. This requirement has to be established in the national or sub-national law system applicable in the area of harvest.

The FAO's (*Food and Agriculture Organization*) FAOLEX database provides an overview of current legislation relating to forestry. In this database, you can search for country-specific laws for different categories under the heading "Country Profiles". The forestry legislation of the selected country is listed in the Forestry section⁴.

Another way to identify the legislation is the ECOLEX database, which contains environmental laws. This database was developed jointly by the IUCN (*International Union for Conservation of Nature*), the UNEP (*United Nations Environment Programme*) and the FAO.⁵

It is also possible to contact the ministries responsible for forestry, nature conservation and the environment.

4.4.2 Step 2: Description of enforcement and monitoring

For the description of the enforcement and monitoring system of the legislation identified in step 1 within the scope of the risk assessment, following information is to be provided:

- ✓ Competent authorities or departments for carrying out monitoring, implementation and law enforcement,
- ✓ sanctions for non-compliance,
- ✓ systems for appealing against decisions, and
- ✓ public access to information.

The description of enforcement and monitoring is intended to ensure that there is no significant lack of enforcement of the national and/or sub-national laws and regulations.

Evidence can be provided by taking into account any legal assessments and reports, prepared by national or international governmental organisations, detailing the level of enforcement of the national or sub-national laws.

Any on-going infringement procedure brought by the European Commission against a Member State, on the basis of relevant Union legislation, shall be also taken into account as evidence for a lack of law enforcement. The existence of a ruling of the Court of Justice against a Member State, for the violation of relevant Union legislation, such as Regulation (EU) No 995/2010 of the European Parliament and of the Council, shall be considered evidence of such a lack of enforcement as well.

If steps 1 and 2 show that

- ✓ applicable laws have been identified for the sustainability criterion being assessed and that no significant lack of enforcement of the national and/or sub-national laws and regulations can be determined, the degree of compliance with the sustainability criterion in question is deemed to be *fulfilled*.
- ✓ that *no* law has been identified for the sustainability criterion being assessed which legally enshrines its implementation, *or* that an enforcement and monitoring system *cannot be documented*, the degree of compliance with the sustainability criterion in question is deemed to be *unfulfilled*.

4.4.3 Step 3: Evaluation of the effectiveness of the legal framework

The optional assessment of the effectiveness of the legal framework identified in steps 1 and 2 in low-risk areas is based on generally accessible and objective indicators or individual, verifiable information.

For this any legal assessments and reports, prepared by national or international governmental organisations, detailing a lack of enforcement of the identified national or sub-national laws shall be taken into consideration. Any on-going relevant infringement procedure brought by the European Commission against a Member State, on the basis of relevant Union legislation, shall be also taken into account. The existence of a ruling of the Court of Justice against a Member State, for the violation of relevant Union legislation, such as Regulation (EU) No 995/2010 of the European Parliament and of the Council, shall be considered evidence of such a lack of enforcement.

Indicators and the corresponding indicator values show the development of the sustainability criterion being assessed and largely, but not exclusively, relate to the development of the condition of the forest covered in the scope of the assessment.

The degrees of compliance with the effectiveness of the legal framework are divided into three categories through an evaluation of the indicators (for more information, see section 6.3):

- ✓ **Category A:** the effectiveness of the legal framework can be confirmed
- ✓ **Category B:** the effectiveness of the legal framework can only be partially confirmed
- ✓ **Category C:** the effectiveness of the legal framework cannot be confirmed

A detailed evaluation of the effectiveness of the legal framework identified using general indicators is only possible at local level in exceptional cases. As a result, one or more indicators are usually assigned to the sustainability criteria in order to obtain a more comprehensive picture of the situation within the scope of the risk assessment.

Suitable indicators are proposed in the following section. Sources are also identified from which further regionally specific indicator values can be determined for the individual sustainability criteria.

Since the underlying data is different, it cannot be guaranteed that indicator values can be determined for all regions or countries from the sources specified in this document. The authors of risk assessments can use indicators they have researched or collected themselves and the indicator values determined for this purpose for evaluation. In this case, they must be *resilient, up-to-date and objective*. Sources and dates must be indicated for all indicators and indicator values used. Ideally, the indicators should not be older than 6 years at the time of the risk assessment.

Storms, droughts, fires or other calamities such as beetle or insect infestation can impair the planned development process of the forest and lead to negative indicator values. These events are beyond the direct control of the legislative authority or the individual economic operator. Consequently, indicator values that have been significantly impacted by these events cannot serve as an indication of unsustainable forest management if the causality is clearly described. Negative indicator values can be remedied by such events if they can be explained by reliable, verifiable, current and objective data.

The risk-based assessment should also take account of any relevant on-going infringement procedures launched by the Commission, which are reflected in the publicly available infringements database of the Commission, and consider any relevant infringement rulings of the Court of Justice of the European Union as evidence of lack of enforcement.

Sustainability criteria that have been assigned to category A or B on the basis of indicators or plausible reasons are considered to have been effectively implemented in the biomass sourcing area. In the case of a sample inspection of the forest biomass producer as part of the scheme audit of the group manager, the auditor verifies that the information in the risk assessment is correct and plausible.

The effectiveness of the legal regulations for the biomass sourcing area is not considered to be confirmed if the sustainability criteria are assigned to category C. In this case, affected economic operators will have to provide detailed proof of their measures to ensure conformity with the requirements of RED III and the SURE-EU system. In the course of the scheme audit, auditors randomly check implementation of these measures in the sourcing area of the forest biomass producers.

4.5 Review of the sustainability criteria for forest biomass as per Article 29 (7) RED II in the risk assessment

The country of origin of the biomass or the regional economic integration organisation where the forest biomass is sourced must have ratified the *Paris Agreement* and fulfils either of the two conditions

- 1) It has submitted a *nationally determined contribution* (NDC) under the 2015 Paris Agreement on Climate Change following the 21st Conference of the Parties to the United Nations Framework Convention on Climate Change, that meets the following requirements:
 - a) the NDC integrates the agriculture, forestry and land use sectors, either combined as one agriculture, forestry and other land use (AFOLU) sector, or as agriculture and LULUCF sectors separately;
 - b) the NDC explains how the agriculture, forestry and land use sectors have been considered in the NDC;
 - c) the NDC counts the emissions and removals from the agriculture, forestry and land use sectors against the country's overall emission reduction target, including emissions associated with harvesting of forest biomass;
- 2) there are national or sub-national laws, applicable to the area of harvest, to conserve and enhance carbon stocks and sinks in forests. Evidence shall be provided that the reported LULUCF sector emissions do not exceed removals on average over the ten years preceding the harvesting of the forest biomass and that carbon stocks and sinks are conserved or enhanced between the last two successive ten-year periods preceding the harvesting of forest biomass. In the risk assessment, this can also be verified using an appropriate indicator and the indicator value to be determined.

On the website of the *United Nations Treaty Collection*, the *United Nations* (UN) publishes a list of the Parties to the Paris Agreement and the status of ratification, which can be used to verify the requirement in Article 29 (7) of RED II⁶.

On its website under NDC Registry, the *United Nations Framework Convention on Climate Change* (UNFCCC) has compiled a list of all Parties that have submitted an NDC and which version has been submitted.⁷

The *status of the region in question* must be indicated in the risk assessment and the source indicated.

5 Assessment of the sustainability criteria

Sources that can be used to determine values for indicators are listed below (not exhaustive). Where the risk assessment area is covered by these indicators and no indicators from other sources are available, these indicators should be used to assess the effectiveness of the legal framework.

Authors of risk assessments are free to use indicators other than the ones proposed here through individual research if a proposed indicator is not applicable, no indicator value is available or other indicators are more appropriate. In this case, it is necessary to verifiably indicate the source of the data and how up-to-date it is, and to document the date of data collection in the risk assessment accordingly. The indicators should not be older than 6 years at the time of the risk assessment.

5.1 Extract from publicly available source for indicator values

- 1) The World Bank's *Worldwide Governance Indicators* are based on data from over 30 different studies provided by NGOs, international organisations and research institutions. The *Worldwide Governance Indicators* can be downloaded as an Excel file from the following link: <https://info.worldbank.org/governance/wgi/>
- 2) As part of the Global Forest Resource Assessment (FRA), the FAO, with the help of national partners, has been collecting data on the state of forests and changes to it at country level over five to ten annual periods since 1946. The *FRA 2015* covers 98.8% of the world's forests.⁸ The *Global Forest Resource Assessment (FRA)* is carried out in five-year periods and the data is updated. The data for past *FRA*s can be downloaded from the FAO website at the link below. An Excel sheet with the results of the respective *FRA*s can be downloaded in the category "Desk Reference" by selecting the sub-item "Download FRA results": <http://www.fao.org/forest-resources-assessment/past-assessments/fra-2015/en/>
- 3) The organisation Forest Europe emerged out of the *Ministerial Conference on the Protection of Forests in Europe* (MCPFE) and sets the framework for European forest policy. Forest Europe publishes the *Country Reports on SFM (sustainable forest management) indicators* of its 46 member states.⁹ These are another source which can provide data for many indicators for the different countries of the member states. The data can be downloaded as an Excel sheet for the different countries:¹⁰ <https://foresteurope.org/iv0306rr0765mv8432cr/>

- 4) In connection with the report *Forests in the ECE Region: Trends and Challenges in Achieving the Global Objectives on Forest Management* of the UNECE, data is published on the state of forests in the ECE region. The data can be downloaded as an Excel sheet from the following link under “Source Data”: <http://www.unece.org/forests/forests-in-the-ece-region-2015.html>
- 5) As part of the Montréal Process, *country reports* containing the “Criteria and Indicators on Sustainable Forest Management” of the twelve member states are published.¹¹ The *country reports* can be downloaded using the following link: https://www.montrealprocess.org/Resources/Country_Reports/index.shtml
- 6) The status of the ratification of the Paris Agreement can be viewed on the website of the United Nations (UN) *United Nations Treaty Collection* at the following link: https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XXVII-7-d&chapter=27&clang=en
- 7) The website of the *NDC Registry* of the *United Nations Framework Convention on Climate Change* (UNFCCC) publishes a list of the countries that have submitted an NDC and which version has been submitted. The *NDC Registry* can be viewed at the following link: <https://www4.unfccc.int/sites/NDCStaging/Pages/All.aspx>
- 8) Chatham House’s *Illegal Logging Portal* provides available information on illegal logging in different countries. The *Illegal Logging Portal* publishes reports on illegal logging and trade that can be filtered and displayed by country. The *Illegal Logging Portal* can be accessed using the following link: <https://www.illegal-logging.info/>

5.2 Sources for indicator values

Publisher and title of the source	Link
World Bank: <i>Global Worldwide Governance Indicators</i>	https://info.worldbank.org/governance/wgi/
FAO: <i>Global Forest Resource Assessment (FRA)</i>	http://www.fao.org/forest-resources-assessment/past-assessments/fra-2015/en/
Forest Europe: <i>Country Reports on SFM indicators</i>	https://foresteurope.org/iv0306rr0765mv8432cr/
UNECE: <i>Forests in the ECE region: Trends and Challenges in Achieving the Global Objectives on Forest Management</i>	http://www.unece.org/forests/forests-in-the-ece-region-2015.html

Montréal Process: <i>Country reports</i>	https://www.montrealprocess.org/Resources/Country_Reports/index.shtml
UN: <i>United Nations Treaty Collection</i>	https://www.montrealprocess.org/Resources/Country_Reports/index.shtml
UNFCCC: <i>NDC Registry</i>	https://www4.unfccc.int/sites/NDCStaging/Pages/All.aspx
Chatham House: <i>Illegal Logging Portal</i>	https://www.illegal-logging.info/

Table 1: Possible sources for indicator values (not exhaustive)

5.3 Overview of indicators of sustainability criteria for forest biomass

The indicators are assigned to the sustainability criteria in the table:

RED III Article 29 (6)	Indicators
Legality of wood harvesting	<ul style="list-style-type: none"> ✓ “Rule of law” ✓ “Control of corruption”
Forest regeneration	<ul style="list-style-type: none"> ✓ Development of the total forest area
Maintenance of biodiversity	<ul style="list-style-type: none"> ✓ Deadwood ✓ Habitat and biotope trees ✓ Protected forest areas ✓ Age and diameter structure
Maintenance of soil quality	<ul style="list-style-type: none"> ✓ Soil condition survey ✓ Programmes, publications or guides on soil protection in forests
Regulations for protected areas	<ul style="list-style-type: none"> ✓ Delineation and definition of protected areas ✓ Statutes, by-laws, programmes, publications or guides for forest management in protected areas
Regulations for particularly valuable landscapes (areas in which restrictions on biomass harvesting apply)	<ul style="list-style-type: none"> ✓ Delineation and definition of the particularly valuable landscapes ✓ Statutes, laws, programmes, publications or guides for forest management in valuable landscapes (land with high biodiversity, wetlands or peatlands).
Maintenance of the long-term production capacity of the forest	<ul style="list-style-type: none"> ✓ Development of the timber stock
Statement of assurance by installations producing biomass fuel from forest biomass that the	<ul style="list-style-type: none"> ✓ Laws, programmes or directives applicable at the sourcing level area

harvesting of forest biomass complies with the restrictions on biomass harvesting on certain valuable landscapes.	
RED III Article 29 (7)	Indicators
Implementation of the LULUCF criteria	<ul style="list-style-type: none"> ✓ Paris Agreement ✓ Submission of the NDC ✓ Description and evaluation of the submitted NDC ✓ Greenhouse gas emissions from the forestry industry as an indicator if the relevant legislation is in place

Table 2: Assignment of indicators to the sustainability criteria

5.4 Legality of wood harvesting

Wood harvesting is not legal if the harvest, trade/distribution or transport of the wood violates national, sub-national or international laws and agreements.

Illegal logging can have many causes. Illegal wood harvesting and trade are often found in countries where *weak or unclear government structures* exist or government structures are lacking. This may be reflected in inadequate legislation, inadequate law enforcement and sanctions or a high rate of corruption.

The indicators used to evaluate the sustainability criterion “legality of wood harvesting” from the *World Bank’s Worldwide Governance Indicators* evaluate the rule of law and corruption control in the countries and can be used to evaluate the legality of wood use in risk assessment:

- ✓ “Rule of law”: This indicator evaluates trust in and compliance with the rules of a country. This includes the enforcement of contracts and property rights. It also takes into account the quality of courts and police and the probability of crime and violence.
- ✓ “Control of corruption”: This indicator evaluates the extent to which the public sector is determined by private profit interests. This includes corruption on any scale and the appropriation of the state by elites and private interests.¹²

For the two indicators “rule of law” and “control of corruption”, the most recent indicator values from the table of the *Worldwide Governance Indicators* “estimate” are to be used. The evaluation of the categories ranges from -2.5 (weak) to +2.5 (strong). The threshold value is 0. This means that the value must be 0 or greater for a positive evaluation.

In addition to the *Worldwide Governance Indicators*, individual research for indications of illegal activities in connection with the harvest, trade/distribute and transport of wood in the region should be conducted and, where appropriate, reported. Internet research, interviews with the local population in the sourcing area or opinions of environmental associations can be used for this purpose (not exhaustive). The *Illegal Logging Portal* of Chatham House or media reports can also be used as a source of information.

If positive indicator values are documented for the criterion of the legality of timber harvesting and there is no evidence of illegal activities, the criterion can be assessed as effectively implemented. In the case of a sample inspection of the forest biomass producer as part of the scheme audit of the group manager, the auditor verifies that the information in the risk assessment is correct and plausible. Similarly, this has to be verified in a second-party audit by the first gathering point.

If the indicator values are negative or there are indications of relevant incidents of illegal activities, the effectiveness of the legal framework is not confirmed. In this case, the economic operators affected must provide evidence of a detailed, in-house preventive risk management action plan to prevent illegal activities related to the harvest, trade/distribution and transport of forest biomass. In the course of the scheme audit of the group manager, auditors randomly check the implementation of these measures in the sourcing area of the forest biomass producers.

5.5 Forest regeneration

Forest regeneration is the *establishment of a stand after harvest interventions or damaging events* such as fire, storm or pest infestation. This can be done either artificially by planting and seeding or naturally through natural rejuvenation.

It is not possible to reliably derive generally valid information on forest regeneration at country level. However, the development of the total forest area in the assessment area is an indication. If this development remains constant or increases, it can be assumed that the forest is being reliably regenerated in the assessment area.

Corresponding indicator values for forest regeneration can be taken from the results of national forest inventories or from the results of the FAO's most recent *Global Forest Resource Assessment (FRA)*. The value under 1.1 is determined for the forest area in the *Global Forest Resource Assessment*. The value "Change Rate" for the period of the last 10 years can be used for this purpose in the table. The threshold value here is -0.05%.

If the forest area decreases by more than 0.05%, the decrease in forest area must be accompanied by plausible and verifiable information on sources to prevent a negative assessment.

The reasons are reviewed by SURE as part of the recognition of the risk assessment and, in the case of a sample inspection, are verified by the auditor of the group manager.

A decline in forest area that is not detrimental to the proof of sustainability in the sense of the SURE sustainability requirements is, for example, an officially approved land use change for infrastructure projects such as the construction of railway lines or power lines.

If forest generation is proven by means of indicators or sufficient reasons, the criterion can be assessed as effectively implemented. In the case of a sample inspection of the forest biomass producer as part of the scheme audit of the group manager, the auditor verifies that the information in the risk assessment is correct and plausible.

However, if the decline in forest area cannot be adequately explained, the effectiveness of the legal framework is deemed to be unconfirmed. In this case, affected economic operators must provide detailed proof of forest regeneration in the sourcing area. In the course of the scheme audit of the group manager, auditors randomly check implementation of measures for forest regeneration in the sourcing area of the forest biomass producers. Similarly, this has to be verified in a second-party audit by the first gathering point.

If a current, reliable and objective indicator from another source is used to evaluate forest regeneration, it must be assured that the forest area in the region in question remains constant or has not decreased by more than 0.05% in a ten-year period in order to arrive at a “low-risk” assessment.

5.6 Preservation of biological diversity

The evaluation of forest biodiversity and its development is complex and requires a high degree of technical expertise. The underlying data used to evaluate the development of biodiversity in general and for forest ecosystems in particular is largely insufficient. In SURE’s risk approach, the development of biodiversity is therefore assessed on the basis of the following indicators and habitat structures. These can be actively influenced and promoted by forest management and policy measures¹³:

- ✓ Deadwood: Volume of standing and lying deadwood
- ✓ Habitat and biotope trees¹⁴: Number of habitat and biotope trees per hectare
- ✓ Degree of naturalness of forests: usually classified as “undisturbed”, “semi-natural” and “plantation”
- ✓ Protected forest areas: percentage of forest protected to maintain biological or landscape diversity

- ✓ Age and diameter structure: Age and diameter structure of trees in the forest

Since these indicators are not widely covered by any studies and are not available for all areas, *at least two indicator values* of the above-mentioned indicators are to be determined and positively evaluated when the risk assessment is created to obtain a positive evaluation of the criterion “biological diversity”. A positive evaluation is possible if no negative trend is found for the indicator in the assessment period, i.e. for example, that the percentage of deadwood is not decreasing or that the area of protected areas is not declining.

In the UNECE report *Forests in the ECE Region: Trends and Challenges in Achieving the Global Objectives on Forest Management*, indicator values for deadwood and naturalness levels of forests can be found under item 13 in the table in the category “Biological Diversity”.

The *Country Reports on SFM indicators* published by Forest Europe contains indicator values for deadwood, naturalness levels of forests and the percentage of protected forest areas in category 4 “Biological Diversity in Forest Ecosystems”.

In the FAO’s *Global Forest Resource Assessment*, data on deadwood can be found under section 3.4 and data on protected areas under category 5.

If the conservation of biodiversity in the sourcing area is sufficiently documented, the criterion can be assessed as effectively implemented. In the case of a sample inspection of the forest biomass producer as part of the scheme audit of the group manager, the auditor verifies that the information in the risk assessment is correct and plausible. Similarly, this has to be verified in a second-party audit by the first gathering point.

However, if there is not adequate proof of biodiversity conservation, the effectiveness of the legal framework is deemed to be unconfirmed. In this case, economic operators affected must provide detailed proof of measures to conserve biodiversity in the sourcing area. In the course of the scheme audit of the group manager, auditors randomly check implementation of measures for biodiversity conservation in the sourcing area of the forest biomass producers.

5.7 Preservation of soil quality

Healthy forest soil is a fundamental prerequisite for the preservation of the overall sustainability of the forest. In the risk assessment, the maintenance of soil quality is evaluated by means of the following indicators:

- ✓ Regular analyses such as soil condition surveys are carried out in the assessment area, in which the development of the soil condition in the forests is evaluated on the basis of factors such as soil carbon content, nutrient availability, pH value, soil

physical parameters, nutrient situation of the forest trees, ground vegetation or crown condition. If these conclude that the soil quality in the forest is not deteriorating, the sustainability criterion “maintenance of soil quality” is assessed to be effective.

- ✓ Soil condition maps, statistical data or other reliable findings are available for the assessment area, which indicate that monitoring of soil quality is effective and that management practices have been adapted accordingly.

The proof of the existence of basic procedures for maintaining soil quality in forests must be determined by *individual research* and documented with verifiable and reliable source data.

If the conservation of soil quality in the sourcing area can be documented, the criterion can be assessed as effectively implemented. In the case of a sample inspection of the forest biomass producer as part of the scheme audit of the group manager, the auditor verifies that the information in the risk assessment is correct and plausible. Similarly, this has to be verified in a second-party audit by the first gathering point.

However, if there is not adequate proof of the maintenance of soil quality, the effectiveness of the legal framework is deemed to be unconfirmed. In this case, affected economic operators must provide detailed proof of the measures to maintain soil quality in the sourcing area. In the course of the scheme audit of the group manager, auditors randomly check implementation of measures to conserve biodiversity in the sourcing area of the forest biomass producers.

5.8 Regulations for protected areas

Setting up and maintaining protected areas plays a central role in achieving nature conservation objectives. Protected areas protect important parts of ecosystems, preserve essential ecosystem services and secure habitats in the long term.

The *categorisation of protected areas* provides guidance as to whether, or to what extent, management is permitted in the protected area¹⁵.

For a positive assessment of the sustainability criterion, the risk assessment must demonstrate the following for “regulations for protected areas”:

- ✓ protected areas have been designated
- ✓ the designated protected areas can be clearly delimited, for example by means of mapping, marking or other geographical information

- ✓ there are official guidelines, protected area by-laws on management, regulations or similar which regulate the removal of forest biomass, either by explicitly excluding it if it is contrary to the protective purpose of the protected areas, or by generally allowing it, provided that it has not been excluded or is explicitly permitted

The information must be ascertained through individual research and substantiated with verifiable and reliable sources, as there is no generally valid information for these indicators.

If sufficient regulations for protected areas in the biomass sourcing area can be verified, the criterion can be assessed as effectively implemented. In the case of a sample inspection of the forest biomass producer as part of the scheme audit of the group manager, the auditor verifies that the information in the risk assessment is correct and plausible. Similarly, this has to be verified in a second-party audit by the first gathering point.

If sufficient regulations for protected areas in the area where the biomass is sourced cannot be confirmed, the effectiveness of the legal framework is deemed to be unconfirmed. In this case, economic operators affected must provide detailed proof of measures to regulate protected areas in the sourcing area. In the course of the scheme audit of the group manager, auditors randomly check implementation of measures to regulate protection areas in the sourcing area of the forest biomass producers.

5.9 Regulations for particularly valuable landscapes, where restrictions on harvesting forest biomass apply

Particularly valuable landscapes in terms of biodiversity and carbon stock have to be preserved. For that purpose, laws or regulations have to set certain restrictions on the harvesting of forest biomass. Under the SURE EU system, those landscapes are classified in two types, based on how restrictive the biomass harvesting conditions are:

- ✓ Type I: includes the areas where biomass may not be harvested under any circumstances, including also the prohibition of extracting biomass for land maintenance. Landscapes contained in this group are primary or old growth forest, natural highly biodiverse grassland, heathland and wetland.
- ✓ Type II refers to the areas where biomass may be harvested only if certain conditions can be proven. This group encompasses highly biodiverse forest, non-natural highly biodiverse grassland and peatland.

The specific conditions for harvesting forest biomass in these landscapes are explained in detail in the document “Technical guidance for the identification of areas with restrictions on biomass harvesting”¹⁶.

This requirement could, in some cases, overlap with the Regulations for protected areas, explained in Section 5.8. Nevertheless, designating the landscapes mentioned here as protected areas is not enough to verify this requirement. In addition, the management regulation of the protected area has to establish that forest biomass may not be harvested in the area, in the case of Type I landscapes, or the additional conditions under which harvesting is allowed, in the cases of Type II areas.

For a positive assessment of the sustainability criterion, the risk assessment must demonstrate the following for “regulations for particularly valuable landscapes, where restrictions on harvesting forest biomass apply”:

- ✓ the areas where restrictions on harvesting forest biomass apply are defined
- ✓ those areas can be clearly delimited, for example by means of mapping, marking or other geographical information
- ✓ there are official guidelines, protected area by-laws on management, regulations or similar which prohibit the harvest of forest biomass in Type I landscapes, under the conditions established in the documents “Scheme principles for the production of forest biomass” and “Technical guidance for the identification of areas with restrictions on biomass harvesting”.
- ✓ there are official guidelines, protected area by-laws on management, regulations or similar which establish the conditions under which the harvest of forest biomass in Type II landscapes is allowed, as defined in the documents “Scheme principles for the production of forest biomass” and “Technical guidance for the identification of areas with restrictions on biomass harvesting”.

There is no specific valid indicator that can be generally applied for this requirement. Thus, the information must be ascertained through individual research and substantiated with verifiable and reliable sources.

If sufficient regulations for the areas in which restrictions on harvesting forest biomass apply in the biomass sourcing area can be verified, the criterion can be assessed as effectively implemented. In the case of a sample inspection of the forest biomass producer as part of the scheme audit of the group manager, the auditor verifies that the information in the risk assessment is correct and plausible. Similarly, this has to be verified in a second-party audit by the first gathering point.

If sufficient regulations for the areas in which in which restrictions on harvesting forest biomass apply in the area where the biomass is sourced cannot be confirmed, the effectiveness of the legal framework is deemed to be unconfirmed. In this case, economic operators affected must provide detailed proof of measures to regulate the particularly valuable

landscapes in the sourcing area. In the course of the scheme audit of the group manager, auditors randomly check implementation of measures to regulate protection areas in the sourcing area of the forest biomass producers.

5.10 Maintenance of the long-term production capacity of the forest

The long-term production capacity of the forest is already reflected in the risk assessment by the following sustainability criteria, among others

- ✓ Preservation of the soil structure
- ✓ Preservation of the biological diversity
- ✓ Guarantee of forest regeneration

In order to classify the risk for the criterion “Maintenance of the long-term productive capacity of the forest” as positive, *all three criteria mentioned above must have been assessed as “effectively implemented” in the previous evaluation.*

In addition, the indicator total timber stock is used to evaluate the sustainability criterion “Maintenance of the long-term production capacity of the forest”. The indicator values for the development of the total timber stock can be determined from the FAO’s *Global Forest Resource Assessment* (item 3.1 “Growing Stock” in the corresponding FRA table). It is recommended that the rate of change in total timber stocks for the most recent 10-year period from the table be used. This should remain at least at the same level or increase.

Declining total timber stocks are only permitted for a positive evaluation if the decline is plausibly, objectively and verifiably explained and current and reliable sources are referenced that confirm this explanation. Possible causes for declining timber stocks, which do not necessarily result in a negative evaluation of the sustainability criterion of the long-term production capacity of the forest as a specific risk, can be damaging events, calamities, fires, storms, droughts, but also forest restructuring measures or the general age structure of forests.

If the growing stock is declining, the values for the net annual increment of the forest and the total fellings must also be used for interpretation in the explanation. The ratio of net annual increment to total fellings reflects the sustainability of timber production. The ratio must be less than 100%, i.e. the number of trees felled must be less than the net annual increment. Net annual increment means the annual growth in volume of the stock of living trees available minus the average natural mortality of that stock.

For European countries, values for total timber growth and total harvesting are provided in the *Country Reports on SFM indicators* of Forest Europe, under section 3.1 in the table.

If the maintenance of the long-term production capacity in the sourcing area can be documented, the criterion can be assessed as effectively implemented. In the case of a sample inspection of the forest biomass producer as part of the scheme audit of the group manager, the auditor verifies that the information in the risk assessment is correct and plausible. Similarly, this has to be verified in a second-party audit by the first gathering point.

If maintenance of the long-term production capacity in the area where the biomass is sourced cannot be confirmed, the effectiveness of the legal framework is deemed to be unconfirmed. In this case, affected economic operators must provide detailed proof of measures to maintain the long-term production capacity in the sourcing area. In the course of the scheme audit of the group manager, auditors randomly check implementation of measures to maintain the long-term production capacity in the sourcing area of the forest biomass producers.

5.11 Guarantee of carbon sequestration parity

There are two ways to assess the risk of *carbon sequestration imparity* in the forest biomass sourcing area:

- 1) The country of origin of the forest biomass or the regional integrating economic organisation has ratified the Paris Agreement *and* has also submitted a NDC.

In addition, it must be verified for the NDC submitted that the country has taken agriculture, forestry and land use into account in the NDC. These can either be integrated together for the AFOLU sector (Agriculture, Forestry and other Land Use) or separately for agriculture and the LULUCF sector in the submitted NDC.

The risk assessment must verify that the following items are covered in the submitted NDC:

- How was the AFOLU sector (possibly also separately for agriculture and the other LULUCF sectors) taken into account in the submitted NDC?
- Are emissions and sinks from the AFOLU sector counted towards the overall emission reduction target in the submitted NDC?
- Are emissions related to the harvesting of forest biomass included in the total emissions of the AFOLU sector?

The ratification of the Paris Agreement can be verified on the website of the *United Nations Treaty Collection*. The submission of the NDC can be checked on the website *NDC Registry* and the relevant NDC can be downloaded to check the above items.

If the country of origin of the forest biomass has ratified the Paris Agreement and submitted an NDC covering the above items, the criterion of carbon sequestration

parity in the forest biomass sourcing area is considered to be effectively implemented.

- 2) If the country of origin of the forest biomass has ratified the Paris Agreement but has not submitted an NDC, it must be shown that laws in accordance with Article 5 of the Paris Agreement are in force¹⁷ in the risk assessment area and their effectiveness can be verified by an indicator.

Suitable indicators are values from independent, scientifically recognised and reliable studies, surveys or methods in which the total GHG emissions and GHG sinks in the forestry industry are recorded and their development monitored. These must show that the forestry industry in the region in question is not a source of GHG emissions (emissions do not exceed removals on average over the ten years preceding the harvesting of the forest biomass). The underlying data must be checked to ensure that it is up-to-date and a verifiable reference must be provided.

The UNECE report *Forests in the ECE Region: Trends and Challenges in Achieving the Global Objectives on Forest Management* includes the values for total greenhouse gas emissions from the forestry industry. Under section 5 “LULUCF”, a positive value in the table for “Forest Land” as an indicator value for a greenhouse gas source and the criterion of carbon sequestration parity in the sourcing area of the forest biomass is deemed to be unfulfilled. However, if it is shown that forestry in the assessment area is not a source of greenhouse gases, the criterion is considered to be effectively implemented.

In addition, the identified laws applicable in the sourcing area of the forest biomass need to ensure that carbon stocks and sinks are conserved or enhanced between the last two successive ten-year periods preceding the harvesting of forest biomass.

If carbon sequestration parity can be ensured in the sourcing area using one of the two options, the criterion can be assessed as effectively implemented. In the case of a sample inspection of the forest biomass producer as part of the scheme audit of the group manager, the auditor verifies that the information in the risk assessment is correct and plausible. Similarly, this has to be verified in a second-party audit by the first gathering point.

If carbon sequestration parity cannot be demonstrated in the area where the biomass is sourced, the effectiveness of the legal framework is deemed to be unconfirmed. In this case, affected economic operators must provide detailed proof of recognised methods to establish carbon sequestration parity in the sourcing area. In the course of the scheme audit of the group manager, auditors randomly check the accuracy of these methods in the sourcing area of the forest biomass producers.

6 Evaluation of the risk assessment

To classify the risk status of the assessment area as *low-risk* or *specified-risk*, the degree of compliance of the sustainability criteria ('harvesting-' and 'LULUCF criteria at national or sub-national level') must be evaluated in steps one and two of the risk assessment¹⁸. The classification of the risk status of the assessment area is based *solely* on the results of the first two steps of the risk assessment.

In contrast, the information provided in the third step of the risk assessment on the effectiveness of the legal framework affects the risk level of *low-risk areas*. Certification bodies are required to take into account the risk level when selecting the sample of producers to be inspected.

The level 3 category of the risk assessment also determines the depth of the inspection in the case of a sample inspection. If the effectiveness of the identified legal framework can be documented by means of indicators or plausible reasons (category A or B), the auditor verifies the *information in the risk assessment* in terms of accuracy and plausibility. Similarly, this has to be verified in a second-party audit by the first gathering point.

However, if a sustainability criterion was not evaluated or if the evaluation yielded a negative result (category C), the auditor verifies on site whether the respective *measures* taken by the forest biomass producer to ensure conformity with the requirements of RED III and the SURE-EU system have been implemented.

6.1 Evaluation of the assessment area as a low-risk area

To classify the risk status of the *assessment area* as "low-risk", it is necessary that the degree of compliance of all underlying 'harvesting-' and 'LULUCF criteria at national or sub-national level' criteria is considered to be fulfilled in the risk assessment. The degree of compliance can be considered as fulfilled if it is confirmed that the criterion is implemented and enforced by the applicable legal framework and if monitoring is carried out.

The classification of the assessment area as a low-risk area means that the principles of sustainable forest management specified in RED III and the SURE-EU system are covered by legislation, monitored and sanctioned in the event of non-compliance.

6.2 Evaluation of the assessment area as a specified-risk area

If the risk assessment classifies the degree of compliance with at least one of the underlying ‘harvesting-’ and ‘LULUCF criteria at national or sub-national level criteria’ criteria are not fulfilled, the assessment area as a whole is deemed to be an area with a specific risk of unsustainable forest management (specified-risk).

It is necessary to classify the degree of compliance of a sustainability criterion as “not fulfilled” if no applicable laws are identified in the risk assessment, if law enforcement cannot be documented or if no monitoring takes place.

Classifying the risk level of the assessment area as “specified-risk” means that the principles of sustainable forest management as outlined in RED III and the SURE-EU system are not fully implemented for at least one sustainability criterion.

In this case, the scheme conformity of the forest biomass for those sustainability criteria whose degree of compliance was classified as “not fulfilled” in the risk assessment must be verified as part of a neutral on-site inspection in accordance with the SURE document “Scheme principles for forest biomass producers”.

6.3 Evaluation of the effectiveness of the legal framework in step 3

The risk level in step 3 is determined by assessing the effectiveness of the individual sustainability criteria as follows:

- ✓ **A:** the effectiveness of the legal framework can be confirmed
(20 points)
- ✓ **B:** the effectiveness of the legal framework can only be partially confirmed
(10 points)
- ✓ **C:** the effectiveness of the legal framework cannot be confirmed
(0 points)

The sum of the assessments of all sustainability criteria yields the risk level of the assessment area. A maximum number of points is awarded if all sustainability criteria are assigned to category A. In this case, the total number of points is 180. The higher the overall score, the more effective the legal framework and its enforcement. The risk level must be taken into account when the certification body selects producers for a sample inspection on a risk-oriented basis.

Further details on the scope, selection and process of sample inspections are described in the SURE document “Scheme principles for the certification process”

6.3.1 Prerequisite for the evaluation of a sustainability criterion as category A

For a sustainability criterion to be classified in category A, all of the following prerequisites must be fulfilled and verified by the risk assessment:

- ✓ The risk assessment identifies at least one applicable legal provision at national or sub-national level which already implements the relevant sustainability criterion.
- ✓ The risk assessment describes how the identified legal provisions implementing the sustainability criterion in question are enforced and monitored in practice.
- ✓ The indicators show whether the sustainability criterion has been effectively implemented.

In the evaluation of the risk assessment, 20 points are awarded for sustainability criteria that were rated in category A.

6.3.2 Prerequisite for the evaluation of a sustainability criterion as category B

For a sustainability criterion to be classified in category B, all of the following prerequisites must be fulfilled and verified by the risk assessment:

- ✓ The risk assessment identifies at least one applicable legal provision at national or sub-national level which implements the relevant sustainability criterion.
- ✓ The risk assessment describes how the identified legal provisions implementing the sustainability criterion in question are enforced and monitored in practice.
- ✓ Not all indicators can confirm the effectiveness of the sustainability criterion

In the evaluation of the risk assessment, 10 points are awarded for sustainability criteria that were rated in category B.

6.3.3 Prerequisite for the evaluation of a sustainability criterion as category C

For a sustainability criterion to be classified in category C, all of the following prerequisites must be fulfilled and verified by the risk assessment:

- ✓ The risk assessment identifies at least one applicable legal provision at national or sub-national level which implements the relevant sustainability criterion.
- ✓ The risk assessment describes how the identified legal provisions implementing the sustainability criterion in question are enforced and monitored in practice.

- ✓ The indicators used to assess the sustainability criteria produce a negative result, indicating that the legal framework is not effective, or an assessment of the sustainability criteria has not been carried out.

In the evaluation of the risk assessment, 0 points are awarded for sustainability criteria that were rated in category C.

6.3.4 Overview of the classification of sustainability criteria of forest biomass

Category	Prerequisite for classification	Points
A Efficiency confirmed	<ul style="list-style-type: none"> ✓ Applicable law was identified ✓ Implementation and monitoring were described ✓ Indicators show effective legal framework 	20
B Efficiency partially confirmed	<ul style="list-style-type: none"> ✓ Applicable law was identified ✓ Implementation and monitoring were described ✓ Not all indicators show effective legal framework 	10
C Efficiency not confirmed	<ul style="list-style-type: none"> ✓ Applicable law was identified ✓ Implementation and monitoring were described ✓ Indicators show a negative result or criterion was not evaluated 	0

Table 3: Overview of the evaluation options for the sustainability criteria

7 Recognition of the risk assessment by SURE

Risk assessments that are used to demonstrate a low risk of unsustainable production of forest biomass in accordance with the SURE-EU scheme principles for “production of forest biomass” must be recognised by the SURE-EU system or verified by the auditor during the inspection of a producer of forest biomass.

For being compliant with the SURE-EU system, the following steps must be taken:

- 1) The information must be provided on the author’s professional background, training/education and other relevant qualifications to demonstrate the author’s suitability to carry out the risk assessment properly.

- 2) Once a risk assessment based on the “Technical guidance for the assessment of the risk of unsustainable production of forest biomass” of the SURE-EU scheme has been completed, the author who compiled the risk assessment must submit it for comment in a public stakeholder dialogue process. The stakeholder dialogue process must be documented.

To this end, the risk assessment should be published for an appropriate period of time, for example 4 weeks, by the independent third party who is the author of the risk assessment (e.g. on the author’s website) and relevant stakeholder groups such as authorities, associations or concerned clubs should be made aware of it (via newsletter or e-mail, etc.).

- 3) SURE or the auditor checks the risk assessments for their methodological accuracy or comparability with the “Technical guidance for the assessment of the risk of unsustainable production of forest biomass”.
- 4) SURE reserves the right to re-evaluate recognised or approved risk assessments with the status of "low-risk" if there are strong indications of a lack of legal framework or inadequate enforcement documented and received in writing in the SURE-EU system.

SURE reserves the right to recognise risk assessments from other (voluntary) certification schemes, provided they have been accredited by the European Commission.

8 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. References to legal regulations always relate to the current version.

9 References

1

TILLMANN F. AND K. DÄNNART (2018): Was ist Risiko? Eine Begriffsbestimmung. Available at: https://www.waldwissen.net/waldwirtschaft/schaden/fva_begriffsbestimmung_risiko/index_DE (last accessed on 17.03 2025).

2

UNIVERSITY OF BATH (ED.) (2020): Risk assessment. Available at: <https://www.bath.ac.uk/corporate-information/risk-assessment/> (last accessed on 17.03.2025).

3

Since the underlying data for the indicators of the forestry and wood processing industry can vary considerably from country to country, the following indicators should only be included in the risk analysis if reliable, up-to-date and objective data is available.

4

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS (ED.) (2020): FAOLEX Database. Available at: <http://www.fao.org/faolex/country-profiles/en/> (last accessed on 17.03.2025).

5

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS (ED.) (2020): ECOLEX. The gateway to environmental law. Available at: <https://www.ecolex.org/> (last recently accessed on: 17.03.2025).

6

UNITED NATIONS TREATY SECTION (ED.) (2015): Paris Agreement. Available at: https://treaties.un.org/Pages/showDetails.aspx?objid=0800000280458f37&clang=_en (last accessed on: 17.03.2025).

7

UN CAMPUS (ED.) (2020): NDC Registry. Available at: <https://www4.unfccc.int/sites/NDCStaging/Pages/All.aspx> (last accessed on: 24.03.2020).

8

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS (ED.) (2020): Global Forest Resources Assessment. Available at: <http://www.fao.org/forest-resources-assessment/past-assessments/fra-2015/en/> (last accessed on 17.03.2025).

9

FOREST EUROPE (ED.) (2020): Signatory Countries. Available at: https://www.google.com/maps/d/u/0/viewer?mid=13L9yMwZ3MPo1_OyyBSZyhQ7yXgSdMB&femb=1&ll=50.62942461483235%2C9.833257623307276&z=3. (last accessed on 17.03.2025).

10

FOREST EUROPE (ED.) (2020): About Forest Europe. Available at: <https://foresteurope.org/foresteurope/> (last accessed on 17.03.2025).

11

Member States of the Montreal Process: Argentina, Australia, Canada, Chile, China, Japan, South Korea, Mexico, New Zealand, Russia, USA, Uruguay

12

MAX PLANCK INSTITUTE FOR CHEMICAL ENERGY CONVERSION (ED.) (2016): World Governance Index (WGI). Available at: <https://www.solarify.eu/2016/08/24/world-governance-index-wgi/> (last accessed on 17.03.2025).

13

KRAUS, D. AND F. KRUMM (ED.) (2013): Integrative Ansätze als Chance für die Erhaltung der Artenvielfalt in Wäldern. European Forest Institute. Available at: https://www.researchgate.net/publication/297757354_Integrative_Ansatze_als_Chance_fur_die_Erhaltung_der_Artenvielfalt_in_Waldern. (last accessed on 17.03.2025).

14

“Habitat or biotope trees are very large, very old trees, both dead and living, which contain microhabitats. They are of central importance for specialised forest animal and plant species.” Definition from: **BÜTLER, R ET AL (2013):** Habitatbäume: Schlüsselkomponenten der Waldbiodiversität. Available at: https://www.wsl.ch/fileadmin/user_upload/WSL/Mitarbeitende/buetler/pdf/Habitatbaume_Kapitel_RBR.pdf (last accessed on 17.03.2025).

15

DUDLEY, NIGEL (ED.) (2013): Guidelines for applying protected area management categories. IUCN. Available at: <https://portals.iucn.org/library/node/30018>. (last accessed on 17.03.2025).

16

Under RED III and SURE Principles, the areas where restrictions on harvesting forest biomass apply are defined considering the status of the land in reference to a cut-off date (January 2008), as defined in the Revised Directive (EU) 2018/2001 Article 29 paragraph 6(a) subparagraph vi.

17

The relevant legislation must ensure that carbon stocks and sinks in the areas of harvest are preserved or enhanced.

18

DEIMER, C. (2005): Honorierungsansätze für Umweltleistungen in der Landwirtschaft. Genese, Trends und Bewertung. Dissertation. Available at: <https://opendata.uni-halle.de/browse?type=author&value=Deimer%2C+Cornelia>. (last accessed on 17.03.2025).

Annex I:

Template for the assessment of the risk of unsustainable production of forest biomass



Assessment of the risk of unsustainable production of forest biomass [- SOURCING AREA -]

Date: [Enter creation date]

1. Information on the author of the risk assessment
<i>[Please enter information about the author of the risk assessment here.]</i>
2. Scope of the risk assessment
<i>[Please enter the geographic scope of the risk assessment here.]</i>
3. Structure of the forestry and wood processing industry in [country]
3.1. Description of the forestry industry
<i>[Please describe the forestry industry in the scope of application.]</i>
3.2. Description of the timber volume and timber use
<i>[Please describe the volume of wood and its use in the scope of application.]</i>
3.3. Description of the wood processing industry
<i>[Please describe the wood processing industry in the scope of application.]</i>
3.4. Sources
<i>[Please indicate the sources used here.]</i>

4. Evaluation of the sustainability criteria for forest biomass	
4.1. Legality of wood harvesting	
Step 1: Identification of applicable laws	
<p><i>[Guidance: Please enter the applicable laws identified here, including a description on how they ensure compliance of harvesting with the applicable legislation in the country of harvest, as set out in point (h) of Article 2 of Regulation (EU) No 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market. If there are several laws, please number them.]</i></p>	
Sources	<i>[Please enter the sources used here. If there are several sources, please assign them to the laws listed above.]</i>
Were applicable laws identified?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Step 2: Description of enforcement and monitoring	
<p><i>[Guidance: Please describe the practical implementation of the laws here, including information on competent authorities or departments for carrying out monitoring, implementation and law enforcement, sanctions for non-compliance, systems for appealing against decisions, and public access to information. Please pay attention to assignment in step 1.]</i></p>	
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in step 1.]</i>
Are enforcement and monitoring ensured for the identified laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Degree of compliance of the criterion “Legality of timber harvesting”	
<input type="checkbox"/> Requirements fulfilled <input type="checkbox"/> Requirements not fulfilled	

Step 3: Evaluation of the effectiveness of the legal framework on the legality of timber harvesting			
<p><i>[Please evaluate and explain the indicators here. Please pay attention to assignment in steps 1 and 2.]</i></p>			
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in steps 1 and 2.]</i>		
Effectiveness (points):	<input type="checkbox"/> Category A (20 points)	<input type="checkbox"/> Category B (10 points)	<input type="checkbox"/> Category C (0 points)

4.2. Forest regeneration	
Step 1: Identification of applicable laws	
<p><i>[Guidance: Please enter the applicable laws identified here, including a description on how they require natural or artificial regeneration, or a combination of both, aiming at the establishment of a new forest in the same area and within at least ten years after the harvesting operation, and that there is no biodiversity degradation in the regenerated forest area, including that primary forests and natural or semi-natural forests are not degraded to or replaced with plantation forests. If there are several laws, please number them.]</i></p>	
Sources	<i>[Please enter the sources used here. If there are several sources, please assign them to the laws listed above.]</i>
Were applicable laws identified?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Step 2: Description of enforcement and monitoring	
<p><i>[Guidance: Please describe the practical implementation of the laws here, including information on competent authorities or departments for carrying out monitoring, implementation and law enforcement, sanctions for non-compliance, systems for appealing against decisions, and public access to information. Please pay attention to assignment in step 1.]</i></p>	
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in step 1.]</i>
Are enforcement and monitoring ensured for the identified laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Degree of compliance of the criterion "forest regeneration"	
<input type="checkbox"/> Requirements fulfilled <input type="checkbox"/> Requirements not fulfilled	

Step 3: Evaluation of the effectiveness of the legal framework for forest regeneration			
<p><i>[Please evaluate and explain the indicators here. Please pay attention to assignment in steps 1 and 2.]</i></p>			
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in steps 1 and 2.]</i>		
Effectiveness (points):	<input type="checkbox"/> Category A (20 points)	<input type="checkbox"/> Category B (10 points)	<input type="checkbox"/> Category C (0 points)

4.3. Biodiversity	
Step 1: Identification of applicable laws	
<i>[Guidance: Please enter the applicable laws identified here, including a description on how they contribute to minimize impacts on biological diversity and ensure the protection of species and habitats. If there are several laws, please number them.]</i>	
Sources	<i>[Please enter the sources used here. If there are several sources, please assign them to the laws listed above.]</i>
Were applicable laws identified?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Step 2: Description of enforcement and monitoring	
<i>[Guidance: Please describe the practical implementation of the laws here, including information on competent authorities or departments for carrying out monitoring, implementation and law enforcement, sanctions for non-compliance, systems for appealing against decisions, and public access to information. Please pay attention to assignment in step 1.]</i>	
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in step 1.]</i>
Are enforcement and monitoring ensured for the identified laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Degree of compliance of the criterion "biodiversity"	
<input type="checkbox"/> Requirements fulfilled <input type="checkbox"/> Requirements not fulfilled	

Step 3: Evaluation of the effectiveness of the legal framework for biodiversity			
<i>[Please evaluate and explain the indicators here. Please pay attention to assignment in steps 1 and 2.]</i>			
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in steps 1 and 2.]</i>		
Effectiveness (points):	<input type="checkbox"/> Category A (20 points)	<input type="checkbox"/> Category B (10 points)	<input type="checkbox"/> Category C (0 points)

4.4. Maintenance of soil quality	
Step 1: Identification of applicable laws	
<i>[Guidance: Please enter the applicable laws identified here, including a description on how they contribute to minimize impacts on soil quality and ensure the protection of soils and regulation of the removal of stumps, roots, deadwood, and where appropriate, needles or leaves. If there are several laws, please number them.]</i>	
Sources	<i>[Please enter the sources used here. If there are several sources, please assign them to the laws listed above.]</i>
Were applicable laws identified?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Step 2: Description of enforcement and monitoring	
<i>[Guidance: Please describe the practical implementation of the laws here, including information on competent authorities or departments for carrying out monitoring, implementation and law enforcement, sanctions for non-compliance, systems for appealing against decisions, and public access to information. Please pay attention to assignment in step 1.]</i>	
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in step 1.]</i>
Are enforcement and monitoring ensured for the identified laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Degree of compliance of the criterion "maintenance of soil quality"	
<input type="checkbox"/> Requirements fulfilled <input type="checkbox"/> Requirements not fulfilled	

Step 3: Evaluation of the effectiveness of the legal framework for the maintenance of soil quality			
<i>[Please evaluate and explain the indicators here. Please pay attention to assignment in steps 1 and 2.]</i>			
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in steps 1 and 2.]</i>		
Effectiveness (points):	<input type="checkbox"/> Category A (20 points)	<input type="checkbox"/> Category B (10 points)	<input type="checkbox"/> Category C (0 points)

4.5. Regulations for protected areas	
Step 1: Identification of applicable laws	
[Guidance: Please enter the applicable laws identified here, including a description on how they ensure an efficient protection of areas designated by international or national law, or by the relevant competent authority, for nature protection purposes, including areas being defined in wetlands, grassland, heathland and peatlands. If there are several laws, please number them.]	
Sources	[Please enter the sources used here. If there are several sources, please assign them to the laws listed above.]
Were applicable laws identified?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Step 2: Description of enforcement and monitoring	
[Guidance: Please describe the practical implementation of the laws here, including information on competent authorities or departments for carrying out monitoring, implementation and law enforcement, sanctions for non-compliance, systems for appealing against decisions, and public access to information. Please pay attention to assignment in step 1.]	
Sources	[Please enter the sources used here. Please pay attention to assignment in step 1.]
Are enforcement and monitoring ensured for the identified laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Degree of compliance of the criterion “regulations for protected areas”	
<input type="checkbox"/> Requirements fulfilled <input type="checkbox"/> Requirements not fulfilled	

Step 3: Evaluation of the effectiveness of the legal framework for regulation of protected areas			
[Please evaluate and explain the indicators here. Please pay attention to assignment in steps 1 and 2.]			
Sources	[Please enter the sources used here. Please pay attention to assignment in steps 1 and 2.]		
Effectiveness (points):	<input type="checkbox"/> Category A (20 points)	<input type="checkbox"/> Category B (10 points)	<input type="checkbox"/> Category C (0 points)

4.6. Regulations for particularly valuable landscapes, where restrictions on harvesting forest biomass apply	
Step 1: Identification of applicable laws	
[Guidance: Please enter the applicable laws identified here, including a description on how they ensure that restrictions on harvesting forest biomass from valuable landscapes apply (i.e. primary forest, old growth forest, highly biodiverse forest, highly biodiverse grassland, heathland), wetland or peatland in reference to the cut-off date. If there are several laws, please number them.]	
Sources	[Please enter the sources used here. If there are several sources, please assign them to the laws listed above.]
Were applicable laws identified?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Step 2: Description of enforcement and monitoring	
[Guidance: Please describe the practical implementation of the laws here, including information on competent authorities or departments for carrying out monitoring, implementation and law enforcement, sanctions for non-compliance, systems for appealing against decisions, and public access to information. Please pay attention to assignment in step 1.]	
Sources	[Please enter the sources used here. Please pay attention to assignment in step 1.]
Are enforcement and monitoring ensured for the identified laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Degree of compliance of the criterion “regulations for particularly valuable landscapes, where restrictions on harvesting forest biomass apply”	
<input type="checkbox"/> Requirements fulfilled <input type="checkbox"/> Requirements not fulfilled	

Step 3: Evaluation of the effectiveness of the legal framework for regulation of particularly valuable landscapes, where restrictions on harvesting forest biomass apply			
[Please evaluate and explain the indicators here. Please pay attention to assignment in steps 1 and 2.]			
Sources	[Please enter the sources used here. Please pay attention to assignment in steps 1 and 2.]		
Effectiveness (points):	<input type="checkbox"/> Category A (20 points)	<input type="checkbox"/> Category B (10 points)	<input type="checkbox"/> Category C (0 points)

4.7. Maintenance of the long-term production capacity of the forest	
Step 1: Identification of applicable laws	
<p><i>[Guidance: Please enter the applicable laws identified here, including a description on how they demonstrate that the long-term production capacity of the forest is maintained or increased and ensure that the forest harvesting does not exceed the annual growth on average, except in cases where it is temporarily justified due to documented forest pests, storms or other natural disturbances; and that it does not hamper the forest's health and the related ecosystem services. If there are several laws, please number them.]</i></p>	
Sources	<i>[Please enter the sources used here. If there are several sources, please assign them to the laws listed above.]</i>
Were applicable laws identified?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Step 2: Description of enforcement and monitoring	
<p><i>[Guidance: Please describe the practical implementation of the laws here, including information on competent authorities or departments for carrying out monitoring, implementation and law enforcement, sanctions for non-compliance, systems for appealing against decisions, and public access to information. Please pay attention to assignment in step 1.]</i></p>	
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in step 1.]</i>
Are enforcement and monitoring ensured for the identified laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Degree of compliance of the criterion "maintenance of the long-term production capacity of the forest"	
<input type="checkbox"/> Requirements fulfilled <input type="checkbox"/> Requirements not fulfilled	

Step 3: Evaluation of the effectiveness of the legal framework for maintenance of the long-term production capacity of the forest			
<p><i>[Please evaluate and explain the indicators here. Please pay attention to assignment in steps 1 and 2.]</i></p>			
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in steps 1 and 2.]</i>		
Effectiveness (points):	<input type="checkbox"/> Category A (20 points)	<input type="checkbox"/> Category B (10 points)	<input type="checkbox"/> Category C (0 points)

4.8. Statement of assurance by installations processing forest biomass	
Step 1: Identification of applicable laws	
<i>[Guidance: Please enter the applicable laws identified here, including a description on how they require that installations producing biomass fuels from forest biomass issue a statement of assurance, that the forest biomass is not sourced from lands where restrictions on harvesting forest biomass apply. If there are several laws, please number them.]</i>	
Sources	<i>[Please enter the sources used here. If there are several sources, please assign them to the laws listed above.]</i>
Were applicable laws identified?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Step 2: Description of enforcement and monitoring	
<i>[Guidance: Please describe the practical implementation of the laws here, including information on competent authorities or departments for carrying out monitoring, implementation and law enforcement, sanctions for non-compliance, systems for appealing against decisions, and public access to information. Please pay attention to assignment in step 1.]</i>	
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in step 1.]</i>
Are enforcement and monitoring ensured for the identified laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Degree of compliance of the criterion "Statement of assurance by installations processing forest biomass"	
<input checked="" type="checkbox"/> Requirements fulfilled <input type="checkbox"/> Requirements not fulfilled	

Step 3: Evaluation of the effectiveness of the legal framework for the statement of assurance by installations processing forest biomass			
<i>[Please evaluate and explain the indicators here. Please pay attention to assignment in steps 1 and 2.]</i>			
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in steps 1 and 2.]</i>		
Effectiveness (points):	<input type="checkbox"/> Category A (20 points)	<input type="checkbox"/> Category B (10 points)	<input type="checkbox"/> Category C (0 points)

4.9. Guarantee of carbon sequestration parity	
Paris Agreement ratified?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Submission of a relevant NDC	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sources	<i>[Please enter the sources used here.]</i>
Brief description of how agriculture, forestry and land use are accounted for in NDC	<i>[Please enter the short description for the submitted NDC here.]</i>
OR^(*) <small>(*) This option should be selected if no NDC has been submitted. If the answer is yes for both options, these fields can be skipped.</small>	
Step 1: Identification of applicable laws	
<i>[Please enter the applicable laws identified here. If there are several laws, please number them.]</i>	
Sources	<i>[Please enter the sources used here. If there are several sources, please assign them to the laws listed above.]</i>
Were applicable laws identified?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Step 2: Description of enforcement and monitoring	
<i>[Guidance: Please describe the practical implementation of the laws here, including information on competent authorities or departments for carrying out monitoring, implementation and law enforcement, sanctions for non-compliance, systems for appealing against decisions, and public access to information. Please pay attention to assignment in step 1.]</i>	
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in step 1.]</i>
Are enforcement and monitoring ensured for the identified laws?	<input type="checkbox"/> Yes <input type="checkbox"/> No (audit required)
Degree of compliance of the criterion "guarantee of carbon sequestration parity"	
<input type="checkbox"/> Requirements fulfilled <input type="checkbox"/> Requirements not fulfilled	

Step 3: Assessment of the effectiveness of the legal framework for the guarantee of carbon sequestration parity			
<i>[Please evaluate and explain the indicators here. Please pay attention to assignment in steps 1 and 2.]</i>			
Sources	<i>[Please enter the sources used here. Please pay attention to assignment in steps 1 and 2.]</i>		
Effectiveness (points):	<input type="checkbox"/> Category A (20 points)	<input type="checkbox"/> Category B (10 points)	<input type="checkbox"/> Category C (0 points)

5. Results			
Criterion	Degree of compliance		Number of points (effectiveness)
	Requirements fulfilled	Requirements not fulfilled	
Legality of wood harvesting	<input type="checkbox"/>	<input type="checkbox"/>	
Forest regeneration	<input type="checkbox"/>	<input type="checkbox"/>	
Maintenance of biodiversity	<input type="checkbox"/>	<input type="checkbox"/>	
Maintenance of soil quality	<input type="checkbox"/>	<input type="checkbox"/>	
Regulations for protected areas	<input type="checkbox"/>	<input type="checkbox"/>	
Regulations for particularly valuable landscapes, where restrictions on forest biomass harvesting apply	<input type="checkbox"/>	<input type="checkbox"/>	
Maintenance of the long-term production capacity of the forest	<input type="checkbox"/>	<input type="checkbox"/>	
Statement of assurance by installations processing forest biomass	<input type="checkbox"/>	<input type="checkbox"/>	
Guarantee of carbon sequestration parity	<input type="checkbox"/>	<input type="checkbox"/>	

6. Evaluation of the risk assessment	
Risk status:	The sustainability criteria were fulfilled <i>[Please enter number] times.</i> The sustainability criteria were not met <i>[Please enter number] times.</i>
	<input type="checkbox"/> Low-risk area <input type="checkbox"/> Specified-risk area
Risk level: (Total points)	<i>[Please enter total score]</i> of a maximum of 180 points was awarded.
Written summary of the results:	
<i>[Please describe the result here and provide explanations.]</i>	

Annex to the risk assessment: Documentation of the stakeholder dialogue
<p>Author of the risk assessment:</p> <p><i>[Please enter the name of the author here.]</i></p>
<p>Date of the stakeholder dialogue:</p> <p><i>[Please enter the date the stakeholder dialogue took place.]</i></p>
<p>Specific issue discussed in the stakeholder dialogue:</p> <p><i>[Please enter the specific issue discussed in the stakeholder dialogue here.]</i></p>
<p>Participating institutions or individuals:</p> <p><i>[Please enter the participating institutions or individuals here.]</i></p>
<p>Result of the stakeholder dialogue:</p> <p><i>[Please enter the result of the stakeholder dialogue here.]</i></p>

Annex II: Revision Information

Revision Information Version 3.0

Section	Change	Date of change
whole document	Version 2.0 updated to 3.0	19.05.2025
whole document	Updated reference to Revised Directive (EU) 2018/2001 (RED III)	19.05.2025
Section 1	<p>added: [...] areas designated by international or national legislation or by the competent authority as nature conservation areas, including wetlands, grassland, heathland and peatland, are protected, with the aim of preserving biodiversity and preventing habitat destruction, [...]</p> <p>added: that forests in which the forest biomass is harvested does not stem from areas where no biomass may be grown, i.e., land with high biodiversity value, wetland and peatland status in reference to the cut-off date care is taken during harvesting to preserve soil quality and biodiversity in order to minimise damage</p> <p>changed to: care is taken during harvesting to preserve soil quality and biodiversity in order to minimise damage and in accordance with sustainable forest management principles,</p>	19.05.2025
Section 1	<p>added:</p> <ul style="list-style-type: none"> - forest biomass is harvested in compliance with the restrictions that apply to valuable landscapes, i.e., land with high biodiversity value, wetland and peatland status in reference to the cut-off date, <p>care is taken during harvesting to preserve soil quality and biodiversity in order to minimise damage and in accordance with sustainable forest management principles</p> <p>changed to: harvesting is carried out considering maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact</p>	19.05.2025
Section 1	<p>amended: installations producing biomass fuel from forest biomass issue a statement of assurance that the biomass is harvested in compliance with the restrictions that apply to the above mentioned valuable landscapes.</p>	19.05.2025

Section	Change	Date of change
Section 2.2	<p>added:</p> <p>In this case, under the SURE-EU system, there are two options to prove compliance:</p> <p>1) First- or Second-party audit. Pursuant to Revised Directive (EU) 2018/2001, only in the case that the sourcing area is evaluated as low-risk, internal or supplier audits (first- and second- party audits respectively) up to the first gathering point may be used to prove compliance.</p> <p>In the case of first-party audits or self-assessments, forest biomass producers must provide a <i>self-statement</i> as proof of compliance with SURE-EU system requirements to the first gathering point (Figure 4) which will be inspected during the SURE-EU audit of the first gathering point.</p> <p>In the case of second-party audit, by the first gathering point, the SURE-EU checklist for forest biomass can be used. The document is available at www.sure-system.org.</p> <p>As part of their audit, first gathering points are obliged to prove</p> <p>(a) whether the requirements for a supplier audit or for accepting self-statements as part of a first-party audit (e.g. valid low-risk assessment of the sourcing area) are met and</p> <p>(b) whether conformity with the RED III requirements has been demonstrated by the suppliers.</p> <p>Further details on the requirements for the first gathering points audits can be found on the document “Scheme principles for the certification process.</p> <p>Protection of designated protected areas, including wetlands, and peatlands</p> <p>changed to:</p> <p>Protection of designated protected areas, including wetlands, grassland, heathland and peatlands</p> <p>added:</p> <p>Preservation and maintenance of particularly valuable landscapes, i.e. high biodiversity land, wetlands and peatlands</p>	19.05.2025
Section 2.2.1	New chapter	19.05.2025

Section	Change	Date of change
Section 4.4.1	added: <i>✓ Preservation and maintenance of particularly valuable landscapes, where restrictions on biomass harvesting apply</i> The legal framework applicable in the area of harvest has to ensure that forest biomass does not stem from land with the status of primary and old growth forest, natural highly biodiverse grassland, heathland and wetland. In addition, the requirements to harvest biomass on other valuable landscapes, i.e. highly biodiverse forest, non-natural highly biodiverse grassland and peatland, have to be set by law	19.05.2025
Section 4.4.1	amended: <i>Statement of assurance by installations producing biomass fuel from forest biomass that the forest biomass is harvested in compliance with the restrictions that apply to the above-mentioned valuable landscapes</i> According to the Revised Directive 2018/2001, not only forest biomass producers have to demonstrate that forest biomass does not arise from land where no biomass may be harvested, but also the processing plants that use forest biomass must do so. Specifically, RED III requires that the installations producing biomass fuel from forest biomass issue a statement of assurance that the biomass is harvested in compliance with the restrictions that apply to the above-mentioned valuable landscapes. This requirement has to be established in the national or sub-national law system applicable in the area of harvest.	19.05.2025
Section 4.4.1	amended: <i>Statement of assurance by installations producing biomass fuel from forest biomass that the forest biomass is harvested in compliance with the restrictions that apply to the above-mentioned valuable landscapes</i> The legal framework applicable in the area of harvest has to ensure that forest biomass does not stem from land with the status of primary and old growth forest, natural highly biodiverse grassland, heathland and wetland. In addition, the requirements to harvest biomass on other valuable landscapes, i.e. highly biodiverse forest, non-natural highly biodiverse grassland and peatland, have to be set by law.	19.05.2025

Section	Change	Date of change
Section 4.4.1	<p>Protection of designated protected areas, including wetlands and peatlands</p> <p>The applicable laws have to ensure an efficient protection of areas designated by international or national law, or by the relevant competent authority, for nature protection purposes, including areas being defined in wetlands and peatlands.</p> <p>changed to:</p> <p>Protection of designated protected areas, including wetlands, grassland, heathland and peatlands</p> <p>The applicable laws have to ensure an efficient protection of areas designated by international or national law, or by the relevant competent authority, for nature protection purposes, including areas being defined in wetlands, grassland, heathland and peatlands.</p> <p>added:</p> <p>Preservation and maintenance of particularly valuable landscapes, where forest biomass shall not be grown</p> <p>The legal framework applicable in the area of harvest has to ensure that forest biomass does not stem from land with the status of high biodiversity land, wetlands or peatlands.</p>	19.05.2025
Section 5.3	<p>amended:</p> <p>[...] Regulations for particularly valuable landscapes (areas in which restrictions on biomass harvesting apply) [...]</p> <p>[...] Statement of assurance by installations producing biomass fuel from forest biomass that the harvesting of forest biomass complies with the restrictions on biomass harvesting on certain valuable landscapes. [...]</p>	19.05.2025
Section 5.3	<p>added:</p> <p>Statement of assurance by installations producing biomass fuel from forest biomass that the forest biomass does not stem from areas where no biomass may be grown</p> <p>Laws, programmes or directives applicable at the sourcing level area</p>	19.05.2025
Section 5.3	<p>added:</p> <p>Regulations for particularly valuable landscapes (areas in which forest biomass shall not be grown)</p> <p>Delineation and definition of particularly valuable landscapes</p> <p>Statutes, laws, programmes, publications or guides for forest management in valuable landscapes (land with high biodiversity, wetlands or peatlands).</p>	19.05.2025
Section 5.4	<p>added:</p> <p>Similarly, this has to be verified in a second-party audit by the first gathering point.</p>	19.05.2025

Section	Change	Date of change
Section 5.5	added: Similarly, this has to be verified in a second-party audit by the first gathering point.	19.05.2025
Section 5.6	added: Similarly, this has to be verified in a second-party audit by the first gathering point.	19.05.2025
Section 5.7	added: Similarly, this has to be verified in a second-party audit by the first gathering point.	19.05.2025
Section 5.8	added: Similarly, this has to be verified in a second-party audit by the first gathering point.	19.05.2025
Section 5.9	<p>new section added:</p> <p>5.9 Regulations for particularly valuable landscapes, where forest biomass shall not be grown</p> <p>Particularly valuable landscapes in terms of biodiversity and carbon stock have to be pre-served. Thus, laws or regulations have to ensure that forest biomass shall not stem from any of the following areas: primary or old growth forest, highly bio-diverse forest, highly bio-diverse grassland, heathland, wetland or peatland. Specific conditions under which these landscapes shall not be used to harvest biomass are defined in the document “Scheme principles for the production of forest biomass”.</p> <p>This requirement could, in some cases, overlap with “Regulations for protected areas”. Nevertheless, designating the landscapes mentioned here as protected areas is not enough to verify this requirement. In addition, the management regulation of the protected area also has to establish that forest biomass shall not be grown in the area. Also, this restriction shall also be applied in the cases that the landscapes are not designated as protected areas.</p> <p>For a positive assessment of the sustainability criterion, the risk assessment must demonstrate the following for “regulations for particularly valuable landscapes, where forest biomass shall not be grown”:</p> <ul style="list-style-type: none"> - the areas where forest biomass shall not be grown are defined - those areas can be clearly delimited, for example by means of mapping, marking or other geographical information - there are official guidelines, protected area by-laws on management, regulations or similar which prohibit the removal of forest biomass, under the conditions established in the document “Scheme principles for the production of forest biomass” <p>There is no specific valid indicator that can be generally applied for this requirement. Thus, the information must be</p>	19.05.2025

	<p>ascertained through individual research and substantiated with verifiable and reliable sources.</p> <p>If sufficient regulations for the areas in which forest biomass shall not be grown in the bio-mass sourcing area can be verified, the criterion can be assessed as effectively implemented. In the case of a sample inspection of the forest biomass producer as part of the scheme audit of the group manager, the auditor verifies that the information in the risk assessment is correct and plausible.</p> <p>If sufficient regulations for the areas in which forest biomass shall not be grown in the area where the biomass is sourced cannot be confirmed, the effectiveness of the legal framework is deemed to be unconfirmed. In this case, economic operators affected must provide de-tailed proof of measures to regulate the particularly valuable landscapes in the sourcing area. In the course of the scheme audit of the group manager, auditors randomly check implementation of measures to regulate protection areas in the sourcing area of the forest biomass producers.</p>	
Section 5.9	<p>Major rewording of whole chapter</p> <p>added: Similarly, this has to be verified in a second-party audit by the first gathering point.</p>	19.05.2025
Section 5.9	<p>[...] the areas where forest biomass shall not be grown are defined [...]</p> <p>changed to: [...] the areas where forest biomass may not be harvested are defined [...]</p> <p>If sufficient regulations for the areas in which forest biomass shall not be grown in the bio-mass sourcing area can be verified, the criterion can be assessed as effectively implemented.</p> <p>changed to: If sufficient regulations for the areas in which forest biomass may not be harvested in the bio-mass sourcing area can be verified, the criterion can be assessed as effectively implemented.</p> <p>If sufficient regulations for the areas in which forest biomass shall not be grown in the area where the biomass is sourced cannot be confirmed, the effectiveness of the legal framework is deemed to be unconfirmed.</p> <p>changed to: If sufficient regulations for the areas in which forest biomass may not be harvested in the area where the biomass is sourced cannot be confirmed, the effectiveness of the legal framework is deemed to be unconfirmed</p>	19.05.2025
Section 5.10	<p>added: Similarly, this has to be verified in a second-party audit by the first gathering point.</p>	19.05.2025

Section	Change	Date of change
Section 5.11	added: Similarly, this has to be verified in a second-party audit by the first gathering point.	19.05.2025
Section 6	added: Similarly, this has to be verified in a second-party audit by the first gathering point.	19.05.2025
Section 6.3	In this case, the total number of points is 140 changed to: In this case, the total number of points is 180	19.05.2025
Annex I	Amendments to assessment template of the risk of unsustainable production of forest biomass	19.05.2025

Publication information

SUSTAINABLE RESOURCES Verification Scheme GmbH
Schwertberger Straße 16
53177 Bonn
Germany

+49 (0) 228 3506 150
www.sure-system.org

Cover photo

© sborisov - AdobeStock