



Scheme principles for neutral inspections

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1 Introduction

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

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

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

2 Inspection system

To guarantee the sustainable production of solid and gaseous biomass fuels and the sustainable production of electricity and/or heat from them, the participants in the value chain must be inspected. The certification body approved by SURE and accredited¹ by national authorities performs regular audits, called scheme audits, of the scheme participant. The audit results are documented in an audit report, approved by the certification body and entered into the SURE database. A successful scheme audit is the prerequisite for SURE certification and certification is the prerequisite for selling sustainable biomass.

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

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

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

The audit and certification process comprises the following steps:

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

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

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

2.1 Types of audits

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

2.1.1 Scheme audits

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

- ✓ **Initial audit**

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

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

✓ **Re-certification audit**

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

Before re-certifying an economic operator who was previously shown to have seriously violated a SURE requirement,

- indicate the schemes he participates in and
- provide the auditor with all relevant information, including mass balance and audit reports,
- or who has been found to be otherwise in violation of the mandatory sustainability criteria,

the certification body must inform SURE.

✓ **Surveillance audit**

Scheme audit conducted during the validity period of the SURE certificate to assess whether the participant meets the requirements for certification. In the SURE-EU system, surveillance audits are carried out during the year in the area of waste and residues after initial certification.

✓ **Follow-up audit**

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

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

2.1.2 Special audits

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

In addition, special audits also represent a quality assurance measure of the scheme operator. The certification bodies and scheme participants to be inspected are selected using objective criteria. Quality criteria (e.g. review of the audit reports and analysis of the certification process as part of SURE monitoring or on the basis of complaints or if external third parties have reported possible non-conformities to the scheme) as well as financial figures (e.g. number of certificates issued) are both included. In addition, special audits can also be initiated based on a sample selection, mainly by auditors and certification bodies. Special audits of scheme participants, auditors or certification bodies can be accompanied by SURE auditors or carried out independently by SURE auditors.

There are different kinds of special audits:

- ✓ **Office audits**

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

- ✓ **Shadow audit**

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

- ✓ **Witness audit**

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

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

- ✓ **Spot audits**

A spot audit is an audit announced at short notice. Spot audits usually focus on checking reports of non-system-compliant activities/conduct or selected

sustainability criteria. This type of audit can be carried out both at a system participant and at a certification body.

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

2.2 Audit methods

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

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

The use of methods should be appropriate and balanced, taking into account the associated possibilities and limitations (according to ISO 19011: guidelines for auditing management systems).

✓ **On-site audit**

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

✓ **Desk audits**

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

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

This audit method is possible as long as

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

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

✓ **Remote audit**

A remote audit is a method, permitted only under certain conditions (see the SURE document "Technical guidance for conducting remote audits"), of carrying out an audit no longer solely on site with the physical presence of the people involved, but virtually with the aid of suitable *information and communication technologies (ICT)*.

Remote audits are *not permitted* if

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

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

2.3 Process and duration of audits

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

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

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

2.4 Inspection intervals

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

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

The following also applies for *collectors and traders/distributors of waste and residues*:

A mandatory surveillance audit must be carried out of the collector and trader/distributor within a six-week period before the end of 6 months after the initial certification. For collection points and traders/distributors who deal with waste and residues as well as with raw materials (e.g. virgin vegetable oil), the surveillance audit is conducted three months after the initial audit (for the first mass balance period).

2.5 Evaluation of the audit results

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

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

Table 1: Evaluation options in the SURE-EU system

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

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

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

✓ **Level 1: compliant (100%)**

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

→ Certificate/inspection certificate can be issued

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

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

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

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

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

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

→ No certificate/inspection certificate

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

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

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

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

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

2.5.1 Definitions of non-conformities

Minor evaluation of SURE criteria:

- ✓ minor non-conformities
- ✓ isolated or temporary non-conformities,
- ✓ non- systematic non-conformities.

Example: Omission of a parameter in the GHG calculation that does not have a significant impact on the GHG intensity report.

Major evaluation of SURE criteria are:

- ✓ major non-conformities
- ✓ recurring and systematic problems or aspects which, either alone or in combination with other non-conformities, may lead to a fundamental systemic failure

Example: systematic problems with the reported mass balance or GHG data report

Critical evaluation of SURE criteria are:

- ✓ endanger the integrity of the SURE-EU system.

Example: Land conversion that contravenes RED Article 29 (3-7); intentional production of waste and residues (e.g. mixing vegetable oil with used cooking oil (UCO = Used Cooking Oil))

KO definition of SURE criteria are:

- ✓ Requirements which, if not complied with, have a particularly critical effect on scheme integrity or which are extremely important for the scheme for other reasons.

2.5.2 Corrective measures, time periods and impacts

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

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

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

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

Criteria evaluated as minor

- ✓ corrective measures must be verifiably implemented no later than by the next regular audit.
- ✓ issue of certificates

Criteria evaluated as major

- ✓ corrective measures must be verifiably implemented no later than 40 days after the audit. Extraordinary circumstances may justify an extension of the time limit by another 30 days. Any such extension is subject to the PRIOR consent of SURE.
- ✓ no certificate is issued (initial audit) until the agreed corrective measure(s) has (have) been implemented in a verifiable, appropriate and timely manner
- ✓ existing certificate suspended for a maximum period of 40 days if the deadline for implementing measures is not met
- ✓ existing certificate withdrawn if, during the period of suspension, the agreed corrective measure has not been implemented in a verifiable, appropriate and timely manner

Criteria-evaluated as critical

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

Criterion defined as KO

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

When a certificate is suspended, participants may NOT label biomass as sustainable.

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

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

The certification body verifies that the corrective measures have been implemented.

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

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

2.6 Reporting

After the audit, the auditor creates an audit report using the report forms provided by SURE that are part of the phase-specific checklists. This report must be countersigned by the person responsible in the audited operation.

The audit report and/or checklist contains information about:

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

The audit report also contains information on the scope of the operation to determine the scope of the audit, the type of biomass and any agreed corrective measures including their

implementation. By collecting this information, the audit report also gives a comprehensive overview of the audit and certification process.

Copies of the audit report are submitted to SURE and stored in the SURE database no later than 6 weeks or 42 calendar days from the first day *after* the on-site audit. As part of internal monitoring, SURE requires certification bodies to provide all audit reports and actual GHG value calculations (including relevant background information where appropriate) on the use of GHG emission saving credits (e_{ccr} , e_{ccs} , e_{sca}). If there are questions about the results, SURE contacts the respective certification body.

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

2.7 Checking documents

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

The economic operators must ensure that the auditor is familiar with all schemes they participate in and that all relevant information is made available to the auditor. This includes the complete mass balance records for a site and access to reports from previous audits².

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

This check can take place during the audit of the economic operator before his participation in the voluntary scheme. In addition, SURE asks the economic operator to provide the auditor with all relevant information on the calculation of the actual GHG emissions prior to the audit. The auditor in turn records the emissions incurred from processing at the inspected site (emissions after allocation) and, if relevant, the actual savings in the audit report in order to document that the calculation was thoroughly verified and understood. If these emissions deviate significantly from the typical values, the report must also include reasons for the deviation³. More information can be found in the SURE document "Technical guidance for greenhouse gas calculation".

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

2.8 Risk management

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

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

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

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

2.9 Issuing and withdrawing certificates

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

There may be a maximum of 6 weeks or 42 calendar days between the date of the audit and the date the certificate is issued. If this is the first certification, the certificate may only be issued after a scheme contract has been signed between SURE and the economic operator. The templates and forms provided by SURE must be used.

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

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

These rules apply equally to inspection certificates issued on request.

Certificate status

valid: an active certificate following the successful completion of an audit

suspended: temporary invalidation of a certificate due to one or more measures not (yet) implemented for criteria evaluated as major, critical or KO

withdrawn: permanently invalid certificate. Possible reasons for a certification body to withdraw a certificate include early re-certification, serious scheme violations, change of certification body

expired/terminated: certificate that is no longer active. The scheme participant may reapply for certification

3 Individual certification

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

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

Affiliated dependent/non-autonomous storage or operating sites must be included in the interface audit and inspected.

Affiliated dependent/non-autonomous storage or operating sites are: Storage or operating sites (e.g. concrete slabs, silos, tanks, etc.) which are part of an interface and receive biomass, weigh it if necessary and keep records of all incoming and outgoing biomass, but do not perform invoicing.

3.1 Inspections and certifications of dependent and non-autonomous storage and operating sites

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

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

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

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

A sample inspection is not possible for economic operators downstream in the supply chain. These economic operators must be individually certified.

3.1.1 Scope and process for sample inspections of storage and operating sites

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

- ✓ results of the internal inspections of the storage and operating sites and assessments of the management and/or previous certifications
- ✓ documents with complaints and other relevant aspects for corrective and preventative measures
- ✓ significant differences in the size of the storage and operating sites
- ✓ deviations in shift models and work procedures
- ✓ complexity of the processes in the individual storage and operating sites
- ✓ changes since the last certification
- ✓ geographic distribution of the storage and operating sites
- ✓ additional risk criteria at the discretion of the respective certification body
- ✓ 25% of the samples are to be selected randomly

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

3.1.2 Threshold value for a failed inspection of storage or operating sites

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

3.1.3 Exemption for transshipment points

Transshipment points are defined in the SURE-EU system as locations where

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

Transshipment points that meet the above criteria are not considered to be operating sites subject to (sample) inspections.

If transshipment points are used as described above, the following do not apply:

- ✓ registration as an operating site in the SURE database
- ✓ the sample inspection

In the context of existing *waste management regulations*, the following prerequisites/conditions must be met to benefit from the exemption:

- ✓ short-term storage for the purpose of transshipment does not generally exceed 24 hours
- ✓ the containers are not changed/mixed (e.g. transferred to new containers)

If the site does not meet the criteria for transshipment points, it is considered a site subject to inspection (storage site).

The certification body must be notified of the use of transshipment points for the transshipment of sustainable biomass pursuant to Directive (EU) 2018/2001.

The certification body checks once on site at the next opportunity whether the requirements of a transshipment point are complied with and confirms this in writing to SURE and to the scheme participant.

The continued use of the transshipment point as such must be verified by the certification body in every subsequent audit (e.g. by providing transport documents from or to the transshipment point). In case of doubt, the certification body is authorised to inspect transshipment points at any time.

4 Group certification

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

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

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

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

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

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

4.1 General prerequisites

Group certification in the SURE-EU system is only for

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

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

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

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

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

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

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

4.2 Requirements of group management

4.2.1 Group manager

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

The group does not have to be an independent legal entity. However, all of the operations in the group must be legally or contractually affiliated with the main office of the group and be integrated into a common administrative system defined and set up by the main office which is monitored and inspected internally. This means that the main office has the right to mandate that the operations introduce necessary corrective measures. This must be documented if applicable in the official contract between the group manager and the operations.

Requirements of the group manager:

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

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

4.2.2 Group members

Requirements of the group members:

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

4.3 Self-declaration

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

4.3.1 Agricultural biomass producers

In the case of *agricultural biomass producers*, a distinction is made between cross-compliance and non-cross-compliance farms in the SURE-EU system. Accordingly, the following self-declarations are available for submission:

- ✓ Self-declaration for producers of agricultural biomass (cross-compliance)

The agricultural biomass producer confirms with his signature, among other things, that he is a recipient of direct payments and therefore subject to *cross compliance* and that the biomass meets requirements for the production of agricultural biomass (Art. 29 of Directive (EU) 2018/2001 or SURE scheme principles for the production of agricultural biomass).
- ✓ Self-declaration for producers of agricultural biomass (not cross-compliance)

The agricultural biomass producer *not subject to cross compliance* confirms with his signature, among other things, that he meets the requirements of the SURE-EU system for the production of sustainable agricultural biomass.

4.3.2 Forest biomass producers

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

The following self-declarations are therefore available for submission:

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

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

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

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

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

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

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

4.3.3 Waste and residue producers

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

- ✓ Self-declaration for producers of waste and residues
- The waste and residue producer confirms with his signature that the delivered material is exclusively waste or residue as defined by Directive (EU) 2018/2001.

4.4 External neutral inspection

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

- ✓ the auditing and certification of the group manager/main office and
- ✓ the sample inspection of the group members in the case of agricultural biomass producers and producers of waste and residues of biomass, or
- ✓ the sample inspection of group members in the case of forest biomass producers from low-risk areas and full inspections in the case of forest biomass producers from specified-risk areas or areas with an unknown risk.

4.4.1 Scope of the samples

The scope of the sample inspections is determined by the certification body based on risk.

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

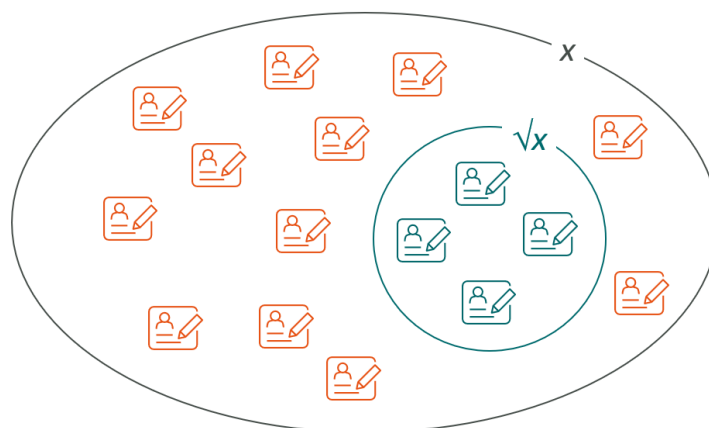


Figure 1: Scope of group members subject to sample inspections, where x = number of valid self-declarations

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

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

The sample scope increases if a threshold of unsuccessful inspections is exceeded (see section 5.3.1).

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

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

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

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

✓ **Agriculture**

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

- cross-compliance farms are subject to sample inspections (see above for scope)
- non-cross-compliance farms must fully inspected

✓ **Forestry**

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

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

Low-risk areas

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

Producers who are also able to document the effectiveness of sustainable forest management using objective indicators (see the SURE document “Technical guidance for the assessment of the risk of unsustainable production of forest biomass”) must be assessed as having a lower risk in the risk-based selection of farms to be subject to sample inspections by the certification body.

Specified-risk areas

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

Sourcing areas without risk assessment:

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

✓ **Waste and residues**

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

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

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

4.4.2 Selection of the samples

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

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

- ✓ The self-declaration does not apply for the entire quantity of biomass produced by the operation.
- ✓ The operation produces sustainable and non-sustainable biomass (if the operation supplies both types of biomass).
- ✓ The biomass is cultivated on nationally or internationally recognised protected areas and is subject to special requirements.
- ✓ Size of the supplier (actual quantity supplied)
- ✓ In the case of forest biomass, proof of the effectiveness of sustainable forest management should also be taken into account in the risk-based selection of the sample using indicators (see section 4.6).
- ✓ The following factors, among others, must be taken into account the case of biomass from *waste and residues*:
 - the type of waste and residue producer
 - the type of waste and residues (e.g. multi-feedstock)
 - type of GHG calculation (mainly in the case of individual calculation)

The sample must

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

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

4.5 Inspections of the group members

As part of the sample inspections carried out by the neutral certification body, the SURE-EU requirements of group members are inspected and evaluated using the phase-specific checklists provided by SURE.

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

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

A *desk audit* may be allowed if it provides the same level of assurance as an on-site audit (e.g. through the availability of high-quality satellite images, data on protected areas and peatland that provide information for the relevant time frame, etc.). Certification bodies must demonstrate under which circumstances a desk audit of this kind could be considered to provide the same level of assurance as an on-site audit.

To this end, criteria must be defined which allow the following to be determined at a minimum:

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

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

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

4.5.1 Agriculture

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

- ✓ the proven conformity with cross-compliance requirements (CC) in the case of agricultural biomass
- ✓ the documentation of information on the farm's cropland (for example, by means of independent databases and tools)
- ✓ the traceability of agricultural biomass from the farm to the land where it is grown
- ✓ plausibility check of the harvest quantities with the land data

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

4.5.2 Forestry

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

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

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

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

For group members who have submitted a self-declaration with the status "low-risk", a *desk audit* is also possible if

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

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

4.5.3 Waste and residues

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

- ✓ traceability requirements
- ✓ plausible type and quantity of biomass
- ✓ documentation requirements
- ✓ where applicable, sustainability requirements (e.g. for agricultural or forestry residues)

For biomass from waste or residues – as long as it did not originate from agriculture, forestry and fishing or from aquacultures – there is no requirement to provide proof related to the land-related criteria in accordance with Directive (EU) 2018/2001. In addition, residues and waste in Europe are subject to monitoring and inspection under the European Waste Framework Directive (EU) 2008/98. The sustainability risk of biomass fuels produced from waste and residues can therefore be regarded as low.

If there are no specific support systems in Europe or the European member states for residue- and waste-based biomass that favour their use over other biomass fuels and thus create incentives for false declarations or fraudulent behaviour, the inspection of the conformity of production plants with the requirements of the SURE-EU system can be carried out as a *desk audit* due to the low sustainability risk and replace on-site inspections if

- ✓ they are conducted with the same level of reliability and accuracy
- ✓ the same depth of inspection can be guaranteed
- ✓ the security and confidentiality of electronic and electronically submitted information is guaranteed
- ✓ it is carried out by mutual consent between the auditor and the producer to be inspected

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

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

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

4.6 Threshold values for a failed inspection

If at least $\frac{1}{3}$ of the operations inspected do not meet the scheme requirements, the scope of the sample inspections must be doubled ($2 * \sqrt{x}$, where x is the number of operations). If at least $\frac{1}{3}$ of the operations inspected do not meet the scheme requirements, the scope of the sample inspections must be doubled again. In an extreme case, this can continue until all operations that belong to this first gathering point have been inspected (inspection density of up to 100%). The first gathering point and/or group manager is informed of all major non-conformities. Only operations that satisfy the scheme requirements may supply biomass certified as “sustainable”. Other operations may not be part of the group.

Group members who do not meet the SURE requirements (KO evaluation) must be excluded from the group and from SURE certification. Group members who have been excluded can only rejoin the SURE-EU system if they have successfully passed a follow-up inspection and are able to document a successful follow-up inspection, for example in the form of an inspection certificate, for the next re-certification of the first gathering point.

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

4.7 Issue of certificates

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

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

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

In addition, the requirements from section 5.3.2 apply.

5 Requirements and responsibilities of certification bodies

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

5.1 Requirements of certification bodies

5.1.1 Recognition by a national authority or accreditation body

All certification bodies require accreditation pursuant to the principles set out in Article 4 of Regulation (EC) 765/2008, either by the competent authority in the respective country or by a national accreditation body according to ISO/IEC 17065 or alternatively ISO/IEC 17021.

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

The certification bodies conduct their audits in accordance with the requirements in ISO 19011 (prerequisite for accreditation). Conformity evaluations are carried out in line with the specifications of ISO/IEC Guide 60.

5.1.2 Registration by SURE and contract conclusion

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

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

implemented. (see SURE document “Scope and basic scheme requirements of the SURE system”)

5.1.3 QM system and documentation

The certification bodies must have a documentation system that, addresses the following elements at a minimum:

- ✓ general quality management system (including manual, guidelines, definition of responsibilities)
- ✓ document and record management
- ✓ management review
- ✓ internal audits
- ✓ procedure for identifying and managing non-conformities
- ✓ procedure for initiating preventive measures to eliminate the causes of potential non-conformities

5.1.4 Independence and impartiality

Evaluations and decisions may not be affected by personal relationships, financial incentives or other types of influences. The certification bodies and the auditors are independent of the interfaces, operations and suppliers and free of all conflicts of interest and can furnish proof of this. An exception is possible for the audit of RED II Article 29 (6) a and Article 29 (7); in this case, first- and second-party audits can be applied up to the first gathering point/collector).

5.1.5 Technical and staffing requirements

The certification bodies have the respective equipment and infrastructure to review compliance with the scheme requirements and the requirements of Directive (EU) 2018/2001 for all participants in the value chain. The certification bodies have sufficient qualified staff which fulfils the requirements listed under section 6. The verification that these prerequisites are fulfilled must be provided by presenting suitable documents on the equipment of the respective certification body, its structure and its staff.

5.1.6 Principle of peer review

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

5.1.7 Handling complaints and claims

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

5.1.8 Selection and appointment of an audit team

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

5.2 Invalidating approval

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

5.3 Responsibilities of certification bodies

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

5.3.1 Risk management

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

5.3.2 Performing audits and issuing certificates and inspection certificates

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

- ✓ identifies the activities undertaken by the economic operator that are relevant to the scheme requirements
- ✓ identifies the relevant schemes of the economic operator and their overall organisation with respect to the scheme requirements and checks the effective implementation of relevant control systems
- ✓ establishes at least a “limited assurance level”⁴ in the nature and complexity of the economic operator’s activities
- ✓ analyses the risks that could lead to a material misstatement based on the auditor’s professional knowledge and the information submitted by the economic operator
- ✓ draws up an audit plan which corresponds to the risk analysis and the scope and complexity of the economic operator’s activities, and that defines the sampling methods to be used for the operator’s activities
- ✓ implements the audit plan by gathering evidence in accordance with the defined sampling methods plus all other relevant proof that the verifier will base his conclusion on
- ✓ requests that the economic operator provide any missing elements of audits, explain variations, or revise claims or calculations before reaching a final verification conclusion⁵

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

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

5.3.3 Managing interface directories

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

5.3.4 Storing and handling information

Certification bodies have to keep the results of audits and copies of all certificates that they issue under the SURE-EU certification scheme for at least 10 years. The audit reports are provided solely to the company and SURE. If a scheme participant switches to a different approved certification body, the first certification body is required to provide the new certification body with the required data. The certification bodies are required to document the results of the conformity evaluation in such a way that it is possible at any time for SURE to check the results and records. In addition, it must guarantee that storage is secure, complete and transparent.

5.3.5 External and internal training for auditors

The certification bodies are responsible for implementing external and internal training for auditors. SURE supports this qualification and further training of auditors through an annual mandatory event for certification bodies. In addition, SURE offers regular information and training events as well as newsletters and communications on current issues and developments for certification bodies and auditors. It is the responsibility of the certification body to appoint a contact person who disseminates this information in internal training sessions.

6 Requirements of SURE auditors

The auditors must be identified to SURE by name and they must furnish proof that they fulfil the requirements below. CVs together with references, confirmations and/or other relevant documents can serve as evidence of sufficient expertise, professional experience and experience as an auditor of a certification body. These must be documented by the respective certification body, updated and provided to SURE upon request. SURE is authorised, particularly

in the case of missing documents or insufficient qualification of the auditors, to reject the application for approval or to withdraw an existing approval.

6.1 Training and qualification

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

6.1.1 Knowledge of GHG balancing

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

At least two years of experience in life cycle greenhouse gas emission assessment and specific experience in verifying GHG emission calculations using the REDI/REDII calculation methodology. Relevant experience depending on the type of audits to be carried out by the individual auditor. When verifying the soil organic carbon content for the purpose of applying the emission reduction credit for soil carbon accumulation (e_{sca}), it should be noted that this requires specific technical expertise (e.g. soil science)

6.1.2 Farms

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

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

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

b) Soil knowledge

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

c) Biological and ecological knowledge

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

Demonstrating compliance with the criterion “high biodiversity grassland” or “forests with high biodiversity and other wooded areas that is species-rich and not degraded” requires technical knowledge that goes beyond the competencies that can be expected of auditors who verify the accuracy of the information provided by economic operators (e.g. assessing whether grassland or wooded land maintains its natural species composition, ecological properties and processes and whether it is species-rich).

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

In terms of the neutral inspection, this means that prudence and care must be exercised in determining the potential biodiversity of grassland or wooded and forested areas: The auditor must assess whether an evaluation of grassland or forest or wooded areas of high biodiversity is necessary or whether the result of the

evaluation is consistent with the information provided by the producer and whether the expert who carried out the evaluation has taken all requirements into account.⁶

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

6.1.3 Forestry operations

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

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

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

b) *Silvicultural knowledge*

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

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

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

The assessment of the risk that the forest biomass has been produced unsustainably in accordance with the requirements of Directive (EU) 2018/2001 Article 29(6) and (7) requires expertise in the relevant legislation and the regulatory framework in the production area, which can be obtained through training in forestry, forest-based industries, forest sciences, environmental sciences, environmental law, landscape

and nature conservation or comparable training courses. Relevant proof of technical and professional expertise must be provided.

d) Assessment of the biological diversity

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

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

In terms of the neutral inspection, this means that prudence and care must be exercised in determining the potential biodiversity of forests and their potential change: The auditor must determine whether a separate assessment of the forest with regard to its biodiversity is necessary or whether the result of the assessment is consistent with the information provided by the producer and whether the expert who carried out the assessment took all requirements into account.⁷

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

6.1.4 Residues and waste

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

a) *Knowledge of handling data sources and registers*

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

b) *Knowledge of waste management*

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

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

6.1.5 Interfaces, storage sites and suppliers

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

6.1.6 Groups

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

6.2 Required knowledge, professional and practical experience as an auditor

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

Table 2: Required competencies of a SURE auditor

6.2.1 Further education and training

The auditors must be trained in the SURE-EU system before they can begin their activities in the scheme. This is done in the SURE system through the train-the-trainer principle. Once approved, auditors are required to attend training courses for the SURE-EU system on a regular basis – at least once a year. The training is either conducted by SURE or, after agreement on content and scope, by qualified individuals responsible for implementing the certification body’s “train-the-trainer principle”. However, this requires that the people responsible and certification bodies have successfully participated in the training courses offered by SURE in keeping with the train-the-trainer principle.

All training and performance assessments of the qualified people responsible and certification bodies are documented. It is the responsibility of the certification bodies to ensure that the auditors conducting the audits on behalf of the certification bodies in the SURE-EU system are verifiably up to date with the current scheme requirements. SURE immediately informs the certification bodies by newsletter, e-mail and other means of communication about changes and other relevant developments in the scheme. SURE reserves the right to request documentation on participants, content, duration and performance assessment from the qualified people responsible and certification bodies.

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

- ✓ content of the relevant legislation
- ✓ content of the scheme documentation in the SURE-EU system
- ✓ review of the knowledge gained as performance assessment

- ✓ content and handling of the SURE-EU checklists for neutral inspections
- ✓ requirements for verifying criteria
- ✓ reporting requirements to SURE
- ✓ practical questions about audits and the SURE-EU system
- ✓ harmonisation of evaluation practices to guarantee consensus

7 Registration

The figure below shows the registration processes for the certification bodies and the auditors. Please see sections “5 Requirements and responsibilities of certification bodies” and “6 Requirements of SURE Auditors” for information about the skills necessary for successful registration. Please see section 7.1 “Relevant documents” for information on the documents required for registration.

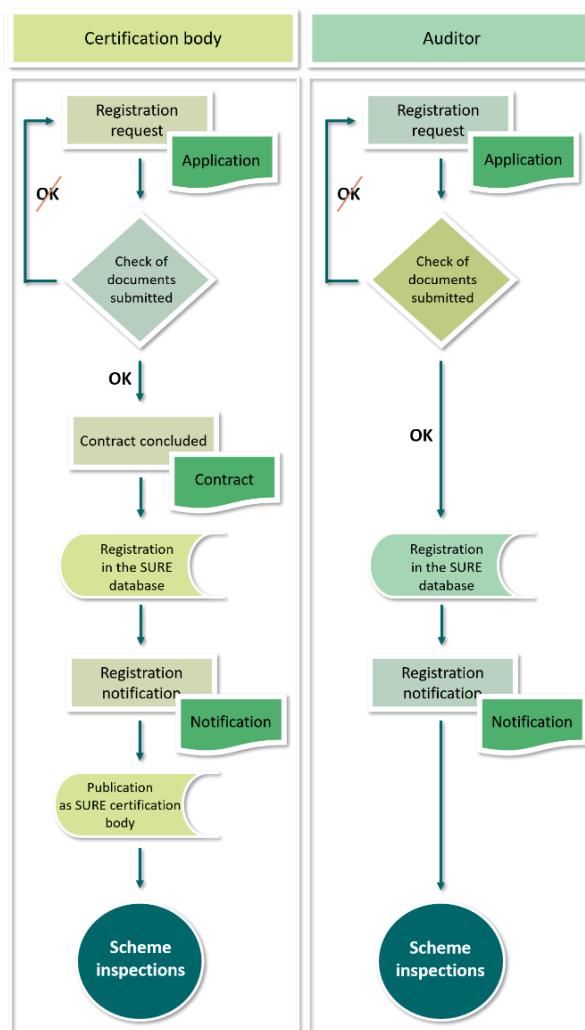


Figure 2: SURE registration processes for certification bodies and auditors

7.1 Relevant documents

7.1.1 Registering a scheme participant

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

7.1.2 Registering a certification body

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

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

The application includes questions in compressed form about information on what is expected from SURE certification bodies formulated under section 5 “Requirements and responsibilities of certification bodies”. It is to be sent by the certification body submitting the application together with the sample documentation listed here to SURE in electronic format. Application and documentation are subject to a review process at SURE. If the information submitted by the certification body does not fulfil the SURE requirements, the registration process is interrupted to clarify any questions. If the information submitted by the certification body meets the requirements, SURE sends the master agreement to the certification body.

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

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

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

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

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

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

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

7.1.3 Registering an auditor

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

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

The application includes in compressed form the request for information on the SURE requirements outlined in section 6 “Requirements of SURE ” for the qualification of auditors deployed for certifications under SURE. It is to be sent by the certification body submitting the application together with the sample documentation listed here to SURE in electronic format. Application and documentation are subject to a review process at SURE. If the information submitted does not meet the qualifications required by SURE, the registration process is interrupted to clarify any questions. If the information submitted meets the qualifications required by SURE, SURE sends a notification of registration of an auditor including the scope registered for the auditor in the SURE-EU system.

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

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

c) Expanding the auditor’s scope

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

8 SURE integrity and quality assurance measures

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

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

9 Relevant documents

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

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

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

10 References

1

until RED II recognition of the SURE-EU system by the EU Commission by country specific accreditation bodies

2

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

3

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

4

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

5

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

6

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

7

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

Annex I: Overview of certification and inspection duties

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

Table 3: Overview of certification and inspection requirements of agricultural producers

The following applies for the area of forestry:						
Individual producer				Documentary proof	Certificates of conformity	Scope
RBA Low risk	RBA Specified risk	No RBA	Registered scheme part.	Operation		
✓				Inspection required	Upon request Inspection certificate	Sample inspection
	✓			Inspection required	Upon request Inspection certificate	All
		✓		Subject to inspections	Upon request Inspection certificate	All
			✓	Subject to certification	Certificate	All

Group member				Documentary proof	Certificates of conformity	Scope
RBA Low risk	RBA Specified risk	No RBA	Registered scheme part.	Operation/group member		
✓				Subject to inspections	Upon request Inspection certificate	Sample inspection
	✓			Subject to inspections	Upon request Inspection certificate	All
		✓		Subject to inspections	Upon request Inspection certificate	All
Group manager				Documentary proof	Certificates of conformity	Scope
		Registered scheme part.	No registered scheme part.	Operation		
		✓		Subject to certification	Certificate	All
			✓	-	-	-

Table 4: Overview of certification and inspection requirements of forest producers

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

Table 5: Overview of the certification and inspection requirements for waste and residues. (Group certification is not possible here.)

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