Scheme principles for integrity management

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1 SURE integrity management

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

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

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

1.1 Transparency within the SURE certification scheme

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

✓ accessibility
✓ transparency/clarity
✓ traceability/plausibility
✓ tamper-proof
✓ credibility/reliability
✓ trustworthiness

To meet the transparency requirements of legislators, but even more importantly, our own standards for an integral certification scheme, the scheme operator-upholds different principles, for example:
✓ transparency in scheme representation
✓ transparency in scheme membership
✓ transparency in scheme management
✓ transparency in certification
✓ assuring scheme integrity and preventing scheme misuse and fraud
✓ continuous improvement

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

The measures that contribute to the transparency required by the legislator are described in section Fehler! Verweisquelle konnte nicht gefunden werden.

1.2 Structure of the SURE integrity management system

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

✓ the compliance management system (see section 3)
✓ the complaint management system (see section 4)
✓ the sanction management system (see section 5)
✓ the crisis management system (see section 6)

Figure 1: Structure of the SURE integrity management system
In addition, the scheme operator has established effective activities within the SURE certification scheme to reduce the potential risk of scheme irregularities, violations, abuse and fraud and to effectively combat these kinds of tendencies. These include:

✓ risk analysis
✓ monitoring
✓ preventive measures
✓ control measures

1.2.1 Risk analysis

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

1.2.2 Monitoring

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

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

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

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

1.2.4 Control measures

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

1) The economic operator has registered. (The control measure undertaken here is the verification of the information provided, particularly in relation to “other” certifications and company renaming activities to prevent scheme hopping, which is the ultimate goal.)

2) The economic operator has signed a scheme contract (this means that his data is entered in the SURE database. This is the only way the economic operator is entitled to obtain a SURE certification)

3) The economic operator has appointed a SURE certification body to carry out SURE-EU certification. (The certification body sends a legally binding declaration to the scheme operator.)

4) The scheme operator expects that an economic operator interested in SURE-EU certification has informed himself about the scheme requirements that need to be fulfilled before the certification body carries out its inspection (audit). (Information on these requirements is available to the economic operator on the scheme operator’s website)

The audit and certification process comprises the following steps:

1) The commissioned certification body conducts the initial audit of the operation (on-site audit and evaluation of the scheme requirements).

2) The certification body writes the audit report and saves it in the SURE database.

3) The scheme operator carries out sample inspections of the reports submitted.

4) The certification body issues the certificate and enters the certificate data in the SURE database. All valid certificates are published at www.sure-system.org.

2 Scheme integrity management

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

- **Tips** provided by interested parties, such as national or international authorities and organisations, by economic operators or certification bodies, as well as through SURE internal monitoring activities are reviewed on the *compliance management system* (see section 3).

- **Complaints** from interested parties, for example national or international authorities and organisations, but also from economic operators or certification bodies are processed via the *complaints management system* (see section 4).

- **Non-conformities** of interested parties, e.g. of SURE certification bodies, are passed on to the *sanctions management system* (see section 5). Non-conformities in this context are interface KOs, whereby a KO of a producer or collector holding being an exception to this rule.

- **Incidents** with potential to trigger a crisis are analysed using the crisis management system (see section 6).

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

All incidents must be documented in writing by interested parties for further processing and can be submitted anonymously to the scheme operator. For this purpose, you can contact SURE directly via ims@sure-system.org or via the contact form on www.sure-system.org. It is also possible to contact a SURE employee directly. All contact information is publicly available at www.sure-system.org.

All entry types can result in monitoring, preventive, corrective and/or sanction measures.
3 Compliance management system

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

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

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

a) sustainability requirements for the production/development and use of biomass to generate electricity and heat, taking into account applicable legal requirements and basic social standards

b) requirements for the GHG emission saving and the calculation method

c) requirements for the verifiable traceability and mass balancing for the continuous proof of origin of biomass over the entire production and supply chain

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

d) for the quality of the documentation and

e) for the chain of custody, in particular for the monitoring and certification of the companies involved.

f) for the assessment of the risk of unsustainable production of forest biomass

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

The scheme operator has established processes that serve to promote scheme transparency and thus ensure compliance. The two diagrams below show examples of the processes involved in the preventive measures to be taken when a potential scheme participant or a potential certification body becomes affiliated with the scheme (e.g. to prevent any “scheme hopping”).
Figure 4: Preventive measures when a potential scheme participant registers with the scheme
4 Complaint management system

A “complaint” is a statement by an interested party that expresses dissatisfaction and is linked to a claim against the scheme operator. A complaint does not justify a legal claim against the scheme operator.
Complaints of any kind may be an *indication of suspected violations or weaknesses* in scheme participants, certification bodies and the certification scheme itself, and may trigger additional inspections. The scheme operator has set up a complaint management system for this purpose.

Every complaint directed at SURE is accepted, analysed and tracked according to Figure . Possible complainants could originate from, for example:

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

The complaint process is confidential in principle, i.e. neither the complainant nor the affected party or parties named in the complaint are disclosed to third parties during the pending proceedings by the scheme provider, unless required by law, for example to the competent authorities. The individual steps in the complaint process are carefully documented by the scheme operator.

The person who initiates the complaint – as long as the complaint was not submitted anonymously – as well as any other parties involved (e.g. competent authorities or the European Commission) are informed of the results of the investigations.

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

Systematic documentation and complaint management contributes to the sound integrity and quality of the SURE-EU system.

If a complaint represents a potential crisis for the scheme operator, the crisis management system is activated by the scheme operator in parallel to the complaint process.
**Figure 6:** Diagram of the complaint process

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

1. All communication channels are available to complaint initiator to submit his complaint to the scheme operator.

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

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

- ✓ the complaint initiator (including contact details, if known)
- ✓ the reason for the complaint (information on the companies involved, types and quantities of biomass/biomass fuels or electricity/heat, time periods and other details)
- ✓ possible causes of the complaint (as long as this can be determined with certainty at that time)
- ✓ potential magnitude of the complaint with respect to the integrity of the SURE system
- ✓ possible conflicts of interest (if known)

3. The analysis will examine and document whether the complaint submitted is so significant with regard to the above criteria that further action must be taken.

4. If the *complaint is not sufficiently clear*, the person who initiated the complaint is contacted and an attempt is made to obtain the missing information from the perspective of the complaint initiator. If the complaint was submitted anonymously and cannot be further clarified because there is no contact person, the complaint process usually ends at this point.

5. If the *complaint is sufficiently substantive and convincing*, the complainant – if known – will receive a letter within five working days confirming receipt of the complaint and assuring him that the complaint will be further investigated and that information on its progress will be provided.

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

7. The reason for the complaint must be explained and eliminated by the person concerned (e.g. scheme participant or certification body).
The scheme operator reviews the *complaints* of the person who submitted the complaint or directly checks the implementation and effectiveness of the measures specified by the person or identified by the scheme operator.

If the assessment of the effectiveness of the measures (e.g. result of another audit) is not satisfactory, a new cycle of measures (see ⑥) is initiated in accordance with the PDCA cycle (Plan-Do-Check-Act).

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

### 5 Sanction management system

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

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

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

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

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

The members need to have technical and professional knowledge and many years of experi-
ence in agriculture and forestry and in the field of waste and residues, as well as in the markets
of electricity and heat production from solid biomass and biogas, but may not be subject to
potential conflicts of interest resulting from past or present professional activities. The chair
of the Sanctions Committee must be a lawyer with the necessary qualifications to hold the
office of judge. This combination ensures that violations of the SURE-EU system are handled
in compliance with technical and legal requirements without the risk of conflicts of interest.

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

6 Crisis management system

For the scheme operator, crises represent incidents that

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

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

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

7 Measures

7.1. Measures to ensure scheme integrity

7.1.1 Transparency in scheme presentation

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

7.1.2 Transparency in scheme membership

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

These contracts ensure that the requirements of the certification scheme:

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

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

7.1.3 Transparency in scheme management

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

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

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

7.1.4 Transparency in certification

To make it possible for all economic operators to have a transparent and tamper-proof overview of all certificates of conformity issued in the SURE-EU system – valid, expired and suspended – the SURE database publicly makes these certificates available online together with detailed information on the validity and the scope of application (www.sure-system.org).
7.1.5 Assuring scheme integrity and preventing misuse and fraud

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

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

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

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

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

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

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

7.2 Measures to ensure scheme compliance

An overview of countries where the SURE certification scheme can be applied is published on the website of the scheme operator (www.sure-system.org).

The scheme operator optionally provides country-specific documents for selected EU member states and third countries, in which information on regional and country-specific conditions (e.g. risk assessments, protected areas etc.) is documented.
To import waste and residues or biofuels, SURE expressly reserves the right to explicitly recognise other individual certification schemes, provided that they meet the requirements defined by the scheme operator at least equivalently. If an economic operator wants to “import” biomass or biomass fuels from other certification schemes for further processing or delivery under the SURE system, he must ensure that the same information on sustainability characteristics and proof of these characteristics is available for these consignments of biomass or biomass fuels as for consignments under the SURE-EU system.

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

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

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

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

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

7.3 Measures to resolve complaints

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

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

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

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

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

In some cases, such as more complex incidents, the scheme operator may need to prepare an interim report. Interim reports must be created if there are more than 4 weeks between confirmation of receipt and resolution of the incident (see section 4, ⑩).

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

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

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

The scheme participant may not supply products certified as sustainable in the period between the failed audit and the follow-up audit.
If after three months no follow-up audit has been carried out, a full scheme audit is required to obtain a new SURE confirmation of conformity.

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

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

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

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

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

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

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

The *SURE sanction system* is structured into several levels:
Sanction level 0
The Sanction Committee determines that no other measures against the scheme participant are necessary.

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

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

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

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

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

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

SURE in turn is required:
- to inform the scheme participant of the Sanction Committee’s decision
- to enforce the sanctions defined by the Sanction Committee with the scheme participant
- to freely decide whether to increase the frequency of audits, also for the other operating sites affiliated with the scheme participant

SURE is also required for **Sanction Level III**
- to review, at its own discretion, whether to prematurely terminate the contract
- to declare termination if necessary
- to undertake other steps to satisfy civil claims (damages)

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

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

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

Another important role in ensuring scheme integrity is played by approved SURE certification bodies and their auditors. For these bodies too, SURE has effective procedures in place to reduce the potential risks of scheme violations, misuse and fraud and effectively combat these kinds of tendencies:

✓ **Systematic monitoring of all procedures**

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

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

In the event of deviating or conspicuous values, the certification body in question is contacted directly and asked to undertake corrective measures. If the deviations continue, the scheme operator can exclude the respective certification body from the certification scheme. In addition, the scheme operator regularly carries out sample inspections of the audit reports stored in the database to ensure that:
- the reports are complete
- the reports are understandable (informative and easy to read)
- the reports are coherent (consistency between evaluation and description of facts)
- the results are plausibly presented

The sample selected takes into account factors such as auditors or certification/registration bodies being monitored, participants in the scheme suspected of a violation or complaints pending. Unacceptable reports are sent back to the certification body for clarification and, if necessary, corrected by a specified date.

✓ **Systematic monitoring of the certification bodies**

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

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

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

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

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

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

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