



SUSTAINABLE RESOURCES
Verification Scheme GmbH

Scope and basic scheme requirements of the SURE system

Version: GSP-B-en-3.1

Date: October 10th, 2025

Valid from: October 15th, 2025

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1 Introduction

Climate change is a global problem which is increasingly influencing political and economic decisions.

One of its primary causes is the increase in emissions of greenhouse gases (GHG; carbon dioxide, methane and nitrous oxide), which can be attributed to increasing levels of industrialisation and the consumption of fossil fuels brought about as a result. However, unsustainable management of agricultural land and forests, for example through grassland conversion or deforestation, also leads to greenhouse gas emissions and thus has a negative impact on the climate.

Reducing GHG emissions is therefore a task faced by the international community which was incorporated into the Kyoto Protocol and ultimately affirmed by the resolutions of the Paris UN Climate Conference.

To reduce GHG emissions, financial incentives have thus been created for investments in renewable energy such as wind and solar power. Electricity and heat generation from biomass is one of the most important cornerstones of the transition to a low-carbon energy supply and accounts for the bulk of GHG reductions in the energy sector, provided that the biomass was produced in line with general sustainability standards.

In response, the European Community introduced regulations for the sustainable and climate-friendly production of biofuels and liquid bioenergy sources with Directive 2009/28/EC (Directive of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC). With the adoption of the recast of this Directive (Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources, for short: RED II and Revised Directive (EU) 2018/2001, for short RED III), the context of the sustainability certificate has now been fundamentally extended to cover all biomass used for energy.

“Based on experience in the practical implementation of the Union sustainability criteria, it is appropriate to strengthen the role of voluntary international and national certification schemes for verification of compliance with the sustainability criteria in a harmonised manner. “It is in the interests of the Union to encourage the development of voluntary international or national schemes that set standards for the production of sustainable biofuels, bioliquids and biomass fuels and that certify that the production of biofuels, bioliquids and biomass fuels meets those standards. For that reason, provision should be made for schemes to be recognised as providing reliable evidence and data where they meet adequate standards of reliability, transparency and independent auditing.”

SUSTAINABLE RESOURCES Verification Scheme GmbH (for short: SURE system) is this kind of “voluntary certification scheme”, recognised by the European Commission and, at national level, by the competent authorities in each member state. SURE is an initiative of the umbrella organisation of the bioenergy industry in Europe “Bioenergy Europe A.I.S.B.L.” and the established and EU-recognised certification company “REDcert Gesellschaft zur Zertifizierung nachhaltig produzierter Biomasse mbH”, that actively seek to demonstrate their willingness to meet their own responsibilities by participating in a collective and comprehensive voluntary certification scheme.

2 SURE’s self-defined role

SURE was formed to define “guidelines” for the sustainable production and use of biogenic resources and to be able to monitor compliance with these guidelines reliably, transparently and legally by independent third parties SURE is thus an instrument to affirm the special position of electricity and heat production from biomass as effective measures in the fight against climate change.

SURE is guided here by relevant legal regulations and social standards and, where necessary, sets its own priorities. In developing scheme requirements, SURE is guided by the following premises:

✓ ***Ensure social acceptance: Sustainability needs a framework***

The generation of electricity and heat from biomass can be an effective measure to reduce greenhouse gas emissions and provide valuable impetus for the transition of the energy sector. However, this assumes that the production and use of biomass is compatible with nature and the environment, that it takes account of social aspects and leads to significant and verifiable savings in greenhouse gas emissions in order to gain acceptance in society and legitimise political and financial support measures.

The use of biomass as an energy source therefore requires a framework to minimise sustainability risks and demonstrate responsible management. SURE defines a framework of this kind and monitors compliance with the measures and regulations set out therein so that potential economic operators can fulfil their environmental and social responsibilities and justify the “licence to operate”.

✓ ***Accepting accountability: companies are committed to sustainability***

Economic operators in the bioenergy sector have a responsibility to ensure that their economic activities meet the requirements of sustainable production and responsible use of biomass.

SURE is a voluntary certification scheme designed to enable operators to assume individual responsibility and actively promote the issue of sustainability in bioenergy. Companies and associations are involved in shaping the general conditions and contribute significantly to the implementation of the verification requirements. By participating in the SURE system, companies acknowledge their responsibility.

✓ ***Actively shaping the future: the scope of certification is continuously being developed***

With the possibility to certify the sustainability of electricity and heat generation from biomass, SURE lays the groundwork for including other potential uses of biomass in the scope of sustainability certification. This enables companies that already use biomass for a wide range of other products or services to learn from the experiences of the energy sector and to set a course towards sustainability in other sectors at an early stage.

Together with economic operators, SURE is continuously developing the certification of sustainable production and use of biomass in other sectors as well.

✓ ***Ensuring compliance: legal obligations are rigorously implemented***

With the entry into force of Directive (EU) 2018/2001 (“RED II”) and Revised Directive (EU) 2018/2001 (“RED III”) and the current legal framework in the EU member states, economic operators engaged in electricity and heat generation from biomass are faced with the challenge of reliably complying with the obligations imposed on them and documenting them in a way that can be verified.

The methodology developed by SURE for sustainability certification makes it possible to implement the legal requirements of RED III efficiently and in compliance with laws, thereby reducing the effort and costs of the obligation to provide proof for the companies in the market. The harmonisation of verification and the transnational approach of SURE enable, in cooperation with other EU-recognised voluntary certification schemes, the free movement of biomass and the establishment of uniform quality standards in Europe.

✓ ***Leveraging synergies: certification solutions from a single source***

The large number of voluntary certification schemes for the different uses of biomass are a challenge for companies not only in terms of organisation but also financially. The SURE system leverages the existing potential synergies with regard to the presentation, verification and implementation of certification.

The SURE system can be used to monitor the sustainability requirements for agricultural and forest biomass as well as for waste and residues from biomass, regardless of whether they are used for electricity or heat generation or for other forms of use. This will include, in the future, the extension of the scope of SURE to sectors

other than the energy sector. The goal is a certification concept that offers a solution for the sustainable production of biogenic raw materials that is independent of end users and can be used and recognised in all areas of biomass use.

✓ ***Designing practical processes: moving forward together with the industry***

The acceptance and support of voluntary schemes means knowing processes in the value chain, understanding needs and coordinating approaches to solutions with the people involved.

SURE involves technical experts and economic operators along the entire supply chain in the design of the scheme requirements in order to build on existing foundations and integrate existing initiatives. Recommendations for the verification of the criteria are checked for feasibility and viability in practice and continuously adapted to the growing challenges together with the economic operators.

✓ ***Enabling competition: diversification ensures high-quality standards***

The range of biogenic fuels is as diverse as their possible uses, and the requirements for proof of sustainability may differ in other countries. The development of voluntary schemes for selected value-added pathways or regions of origin creates the opportunity to address individual characteristics and special challenges. However, this can also lead to competition between voluntary schemes.

SURE promotes competition in the scheme landscape to create options for tailor-made solutions and to reduce market risks by diversifying voluntary schemes. Competition within the scheme landscape helps to boost the quality of the voluntary schemes among one another and to develop potential for reducing costs.

3 Conditions and scope of validity

The SURE-EU system applies to solid and gaseous biomass fuels¹ produced from the following types of biomass², provided that the specific requirements set out in Revised Directive (EU) 2018/2001, Article 29 (1) and (2) are met:

- ✓ Biomass from agriculture, including agricultural waste and residues
- ✓ Biomass from forestry, including forest waste and residues
- ✓ Waste and residues from biomass

The SURE-EU system *explicitly does not include* liquid energy sources such as biofuels or bioliquids. Furthermore, the scheme cannot be applied to liquid or gaseous renewable fuels for transport of non-biogenic origin or to recycled carbon fuels.

SURE-EU is a voluntary scheme which covers the entire biomass chain and therefore targets the following economic operators:

- ✓ producers of agricultural raw materials and forest biomass
- ✓ first gathering points of agricultural or forest biomass
- ✓ producers of waste and residues from biomass
- ✓ collection points for waste and residues fed into the processing chain
- ✓ conversion plants of all kinds
- ✓ biomass suppliers (raw materials and biomass biofuels)

The SURE-EU system can therefore be used to fulfil the sustainability criteria set out in Article 29 (2) to (7) of Revised Directive (EU) 2018/2001 and to provide accurate data on greenhouse gas emission savings for the purposes of Article 29 (10) of Revised Directive (EU) 2018/2001. However, the SURE-EU system cannot be used to demonstrate compliance with the criteria for certification of low ILUC-risk biofuels, bioliquids and biomass fuels established by Delegated Regulation (EU) 2019/807.

In order to participate in the SURE-EU system, prospective economic operators register for a defined scope depending on their activities and are checked as part of the certification inspection for this scope. The inspected and thus permissible scope is part of the information on the issued certificate. This is intended to prevent and eliminate misuse of a valid certificate by operators carrying out activities for which they have not been audited and certified. An overview of the coded scopes of the SURE-EU system can be found in Annex 2 of these scheme principles. (The registration process of economic operators is described in section 5.8. "Registration and certification".)

The SURE-EU scheme can generally be used globally. SURE reserves the right to exclude countries from the SURE-EU scheme based on a risk assessment and geopolitical developments³. A country that is eligible under the SURE-EU scheme must fulfil the corresponding requirements. The necessary information on the specific regional and national conditions in connection with soil classification, production, cultivation and social issues is available. The geographical scope refers to the place where the raw material was grown/collected or processed.

If the economic operator participating in the SURE-EU system imports biomass from other countries outside the defined geographical scope of the SURE-EU system, it must prove that the biomass meets at least the requirements of the SURE-EU system, which necessarily requires certification of this biomass under another voluntary scheme recognised by the European Commission (see also section 5.9).

To establish a common understanding of the terms and definitions used in these SURE scheme principles, please refer to the document “Definitions in the SURE system”. All of SURE’s scheme principles refer to the above document.

4 Organisational structure of SURE

The SURE system is operated by SUSTAINABLE RESOURCES Verification Scheme GmbH. The company focuses on the following activities:

- ✓ development, evaluation and adaptation of scheme requirements to comply with legal and operational specifications
- ✓ operation of the voluntary scheme (registering, monitoring and inspecting economic operators and certification bodies, etc.)
- ✓ development and implementation of measures to assure the integrity of the scheme and prevent misuse and fraud
- ✓ implementation of measures for transparent scheme operation
- ✓ implementation of measures for dealing with complaints
- ✓ support for producers (companies) and economic operators in scheme implementation

The figure below provides an overview of the organisational structure of the SUSTAINABLE RESOURCES Verification Scheme GmbH (for short: SURE):

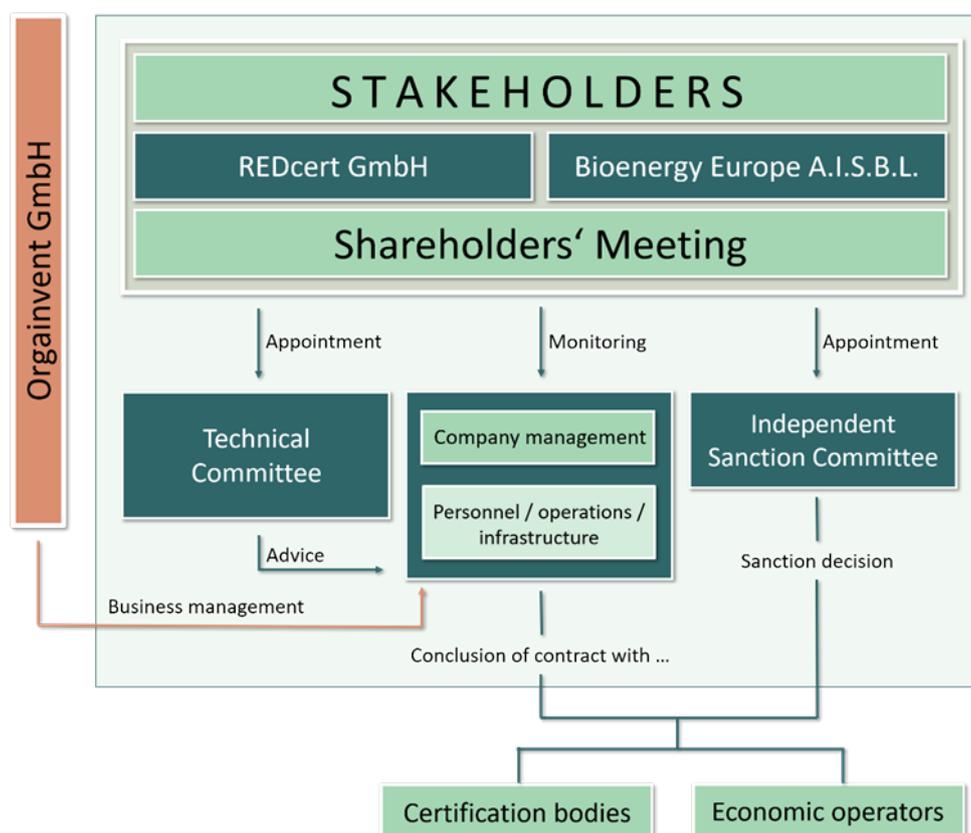


Figure 1: The organisational structure of SUSTAINABLE RESOURCES Verification Scheme

✓ Shareholders' meeting

The shareholders' meeting represents the partners of SURE. These are

- Bioenergy Europe A.I.S.B.L. and
- REDcert – Zertifizierungsgesellschaft für nachhaltig produzierte Biomasse mbH

Their responsibilities are defined in the company's Articles of Association. These include:

- a) auditing the annual financial statements
- b) using the net income
- c) discharging the company's management for the last business year
- d) appointing and dismissing the members of the Technical Committee and the Sanctions Committee
- e) defining the Rules of Procedure
- f) selecting the auditor for the current financial year

The shareholders' meeting defines the strategic and economic goals, but has *no influence* on the operation of the SURE system. This rules out any conflict of interest between their association activities and their activities as shareholders of SURE.

✓ **Technical Committee**

The Technical Committee defines the principles and content of the voluntary scheme to meet the applicable legal requirements for biomass for energy production and develops the scheme taking into account the interests of all economic groups concerned.

The Technical Committee advises the executive management in the areas entrusted to it. The Committee's working methods are laid down in the Rules of Procedure, which also take into account potential conflicts and how to resolve them. The management must consult the Technical Committee before taking decisions that fall within the jurisdiction of this Technical Committee and must justify to the shareholders any decisions taken against the recommendations of the Committee.

The members of the Committee need in-depth knowledge as well as technical and professional experience in all economic sectors covered by the voluntary scheme and must be familiar with the rules of the SURE-EU system as well as other sectoral voluntary certification schemes (quality management, environmental management, energy management). Where appropriate, representatives from the scientific community, public authorities and non-governmental organisations are involved. The chair of the Technical Committee has the right to participate in the shareholders' meetings. At the annual shareholders' meetings, the chair must report to the shareholders on the activities of the previous financial year.

✓ **Sanction Committee**

The SURE Sanction Committee is the body established under the SURE-EU voluntary scheme to issue sanctions for violations by SURE scheme participants. Its responsibilities and tasks are described in the scheme principles and implemented through a master agreement and Rules of Procedure with the appointed members of the Sanction Committee.

The members of the Sanction Committee need to have technical and professional knowledge and many years of experience in agriculture and forestry and in the field of waste and residues as well as in the markets of electricity and heat production from solid biomass and biogas, but may not be subject to *potential conflicts of interest* resulting from past or present professional activities. Should a potential conflict of interest arise despite this requirement, the decision-making process outlined in Article 4(2) of the Rules of Procedure will take account of this.

The chair of the Sanction Committee must at least 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.

✓ **National Supporting Bodies**

As Biomass is a regional energy source we work with our national partners, to ensure a sustainable use of biomass. In this way, we ensure that we have local contacts for both the economic operators and our SURE team.

Working without national partners we address regional specifications focussing particularly on the proof of legality of timber harvesting as well as the analysis of the legal framework. Due to this our partners are instrumental to the SURE system. Our national supporting bodies (NSB) also organise workshops and information events in order to explain the requirements and approaches of the SURE-System in a constant dialogue with the economic operators. They help to overcome language barriers, are the contact persons for economic operators on the spot and enable a practice-oriented knowledge transfer.

For their part, the National Supporting Bodies meet once a year in the NSB Committee for a joint exchange of experiences, report on relevant developments in their countries and make recommendations for the continuous further development of the certification scheme. The NSB network of national partners is continuously expanded according to needs after checking their qualifications.

✓ **ORGAINVENT GmbH (agency)**

ORGAINVENT GmbH *operates the voluntary scheme* on behalf of SUSTAINABLE RESOURCES Verification Scheme GmbH. In this role it provides the necessary business premises, office equipment and staff. Business operations are regulated in long-term contracts with regard to the rights and obligations of the contractual partner (including data protection requirements, remuneration and liability). There is no conflict of interest between the other business areas and activities of ORGAINVENT and its activities for SURE.

ORGAINVENT has been operating since 1998 as a leading voluntary scheme for identifying the origin of meat (for further information, see www.orgainvent.de) and with its many years of experience has played a major role in the establishment of REDcert GmbH.

5 The SURE-EU voluntary scheme

The SURE voluntary scheme is designed to satisfy the basic requirements of the Revised Directive (EU) 2018/2001:

- 1) Sustainability requirements for the cultivation and production of biomass or the generation of waste and residues from biomass, taking into account applicable legal requirements (CAP-Conditionality criteria) and basic social standards in accordance with the ILO convention
- 2) Requirements for the GHG emission saving and the calculation method
- 3) Requirements for traceability and mass balancing for the continuous proof of origin of biomass over the entire production and supply chain

It also defines requirements for the quality of documentation as well as the chain of custody, particularly for auditing and certifying the participating companies.

These requirements are captured in the scheme documentation (scheme principles) that are recognised by the European Commission under the European approval process.⁴

5.1 Sustainability requirements for cultivating and producing agricultural biomass

When farms produce “sustainable biomass” as defined in Revised Directive (EU) 2018/2001, they must satisfy the sustainability requirements of RED III:

- 1) Protection of land with high biodiversity value
- 2) Protection of land with high carbon stocks
- 3) Protection of peat bog areas
- 4) Environmentally responsible management

These requirements are described in detail in the SURE document “Scheme principles for the production of agricultural biomass”.

5.2 Sustainability requirements for cultivating and producing forest biomass

When forestry operations produce “sustainable biomass” as defined in Revised Directive (EU) 2018/2001, they must prove that the RED III sustainability requirements are verifiably regulated by law and effectively enforced in the harvesting area

- 1) Legality of harvesting, transport and trade/distribution of biomass and compliance with international conventions
- 2) Protection of designated protected areas, including wetlands and peat bog areas
- 3) Preservation and promotion of biological diversity
- 4) Environmentally responsible forest management
- 5) Guarantee of forest regeneration and maintenance or optimisation of the long-term production capacity of the forest
- 6) Guarantee of the carbon neutrality of the production area

Alternatively, conformity with Revised Directive (EU) 2018/2001 can be verified by an audit in the biomass sourcing area.

These requirements are described in detail in the SURE document “Scheme principles for the production of forest biomass”.

5.3 Special requirements for the collection and use of waste and residues

Biomass from waste and residues performs better in greenhouse gas accounting compared to the production of agricultural or forest biomass because the life cycle emissions can be set to “zero” up until the time it is collected. Moreover, no area-related sustainability criteria need to be verified for waste and residues.

With regard to specific requirements for waste and residues, particular attention is paid to the correct classification of a material as “waste”, “residue (production residue)”, “product” or “co-product”. This is described in detail in the SURE document “Scheme principles for the production of waste and residues from biomass”.

5.4 Requirements for the GHG emission saving and the calculation methods

To meet the requirements set out in the Directive, the quantity of electricity or heat produced from solid or gaseous biomass fuels under the SURE-EU scheme must be proven to have a GHG emission saving that complies with the applicable legal minimum requirements compared to emissions from electricity and heat production from comparable fossil fuels, if the biomass is to be used in biomass installations that are required to reduce greenhouse gas emissions. Each economic operator along the production and supply chain for solid or gaseous biomass fuels, from the producer to the conversion plant (corresponds to the “last interface” and is usually also referred to as such) must report the GHG emissions of the biomass supplied/produced:

- ✓ using an actual value that was calculated according to the methodology described in Annex VI (B) of Revised Directive (EU) 2018/2001 or
- ✓ using NUTS2 values for those biomass types that were specified in the reports of the member states (if available) in accordance with Article 31(2) of Revised Directive (EU) 2018/2001 or
- ✓ using disaggregated default values in accordance with Annex VI (C) and (D) of Revised Directive (EU) 2018/2001

Economic operators who make statements on greenhouse gas emissions based on default values must demonstrate in the audit an understanding of the prerequisites for and the correct application of the default values. For this purpose, the technical scope "7001 Greenhouse gas calculation (default values)" must be registered in the SURE database.

Economic operators making statements on GHG emissions based on actual values shall demonstrate in the audit the understanding of the methodology and its correct application. For this purpose, the technical scope "7002 Greenhouse gas calculation (actual values)" must be registered in the SURE database.

Every interface that receives a consignment with biomass that requires a greenhouse gas calculation must calculate the GHG emissions resulting from transport and delivery:

- ✓ in accordance with the formula provided in the SURE document “Technical guidance for greenhouse gas calculation” (section 3) or
- ✓ using disaggregated default values in accordance with Part C or D of Annex VI of Revised Directive (EU) 2018/2001

The last interface (usually the conversion plant or “end producer”) has to determine the GHG emission saving by first calculating the total emissions from the production of the solid

or gaseous biomass fuel, based on data provided by the production and supply chain, and adding the factor conversion to electricity, heat or cogeneration in accordance with the methodology set out in Annex VI (B) of Revised Directive (EU) 2018/2001. This value is then compared with the reference values for electricity and heat production from fossil fuels to determine the GHG emission saving.

For the end producer, there are two ways to calculate the total emissions for the production of electricity or heat:

- ✓ using the default value if a default value for the GHG emission saving is specified in Part A of Annex VI, and if the el value for solid or gaseous biomass fuels calculated in accordance with point 7 of Part B of Annex VI is less than or equal to zero, or
- ✓ using a value that is the result of the sum of the sub-elements in the formula set out in point 1 of Part B of Annex VI, whereby the disaggregated default values in Parts C or D of Annex VI may be used for some factors and the actual values calculated according to the methodology described in Part B of Annex VI for all other factors.

Only actual GHG emission values along the supply chain must be recorded/transmitted in the appropriate unit (i.e. dry matter for feedstocks and intermediate products). Furthermore, actual values for each specific element must be reported (if appropriate). If (disaggregated) default values are applied, it is sufficient to say “(Disaggregated) default value used” or similar wording.

Default and disaggregated default values may only be used if it is ensured that the biomass in question or the specified processing process corresponds exactly to the respective definition of these default values according to Revised Directive (EU) 2018/2001.

The emissions related to the delivery of the end product also have to be included and calculated in accordance with the formula provided in the SURE document “Technical guidance for GHG calculation” (section 3.5). GHG emissions related to the storage of end products and associated potential emissions must also be taken into account (see also section 3.5 of the SURE document “Technical guidance for greenhouse gas calculation”).

5.5 Requirements for traceability and mass balancing for the continuous proof of origin of biomass

Typically, biomass fuels have a production chain with many links, from the point of origin to their final use. Feedstock is often transformed into an intermediate product and then into a final product. It is in relation to the final product that compliance with the requirements of the SURE-EU System needs to be shown. To show this, claims will need to be made about the raw material and/or intermediate products used.

The method by which a connection is made between information or claims concerning raw materials or intermediate products and claims concerning final products is known as the chain of custody. In the SURE-EU System, the chain of custody includes all the stages from the feedstock production up until the use of the biomass fuel to produce heat and/or electricity.

To enable verification of any evidence of compliance with the requirements of the SURE-EU System in the chain of custody an information and traceability system must be set up 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 or counted towards meeting renewable energy or greenhouse gas reduction targets (“multiple claiming”).

Every biomass consignment that is used to produce electricity and heat therefore has to

- ✓ have clear and unambiguous labelling (e.g. with a unique identification number)
- ✓ weighed or measured to determine the quantity
- ✓ contain information about the supplier
- ✓ be labelled with their GHG emission value for each specific element (explicitly stated in the respective unit) or with “(Disaggregated) default value used”, and
- ✓ clearly identified by the certificate number on the shipping papers under the SURE system (or another approved voluntary scheme when it enters the production and supply chain of the SURE system)

This makes it possible to trace the origin of sustainable biomass used for the production of electricity and heat through the various stages of marketing, production and supply, back to where it was originally grown.

In addition, the SURE-EU system requires a mass balancing system that

- ✓ makes it possible for raw materials and biomass fuel consignments with different sustainability properties to be mixed

- ✓ requires that information on the sustainability properties of partial consignments remains assigned to the mixture
- ✓ makes it possible for the sum of all consignments withdrawn from the mixture to be described as having the same sustainability characteristics, in the same quantities, as the sum of all consignments added to the mixture

These requirements are also described in detail in the SURE document “Technical guidance for mass balancing”.

5.6 Documentation requirements

The documentation requirements are laid down in the SURE scheme principles

- ✓ production of forest biomass
- ✓ production of agricultural biomass
- ✓ production of waste and residues from biomass
- ✓ use, processing and distribution/trade of biomass fuels and their conversion to electricity and heat

and in the documents

- ✓ Technical guidance for greenhouse gas calculation
- ✓ Technical guidance for mass balancing
- ✓ Technical guidance for the assessment of the risk of unsustainable production of forest biomass

Proper documentation is required to comply with the requirements for the generation of electricity and heat from sustainable biomass. This is a mandatory component of an auditable management system⁵.

Particularly important in the documentation in the mass balancing system are the results of mass balancing at the end of the permissible balancing periods.

The documentation related to the production and traceability of sustainable biomass must be thoroughly reviewed as part of the certification process. Producers/production operations and economic operators therefore have to share their documentation with the certification body. This obligation does not just apply to the documents directly related to SURE certification, but also to other documents (accounting, other voluntary schemes...) at the discretion of the certification body responsible to the extent that these are viewed as required to verify scheme-compliant activities. In addition, producers/production operations

and economic operators shall keep their documentation for a minimum of 5 years, or longer if required by the relevant national authority., and provide access to this documentation at any time and regardless of the format or type of the respective document (printout, electronic file).

In order to fulfil its reporting obligations in accordance with Article 30 (8) to (10) of Revised Directive (EU) 2018/2001 and Article 17 of Implementing Regulation (EU) 2022/996 SURE is requested to provide the European Commission with timely access to actual GHG calculations certified under the scheme upon request. SURE therefore reserves the right to request all necessary documentation from the certification bodies if needed.

In addition, economic operators are required to enter, where necessary, all relevant information in the European Commission's database.

5.7 Scheme function

Recognition by the European Commission of the SURE-EU system essentially guarantees the robustness and quality of the certifications and serves as a prerequisite for broad acceptance on the market.

The certification bodies approved by SURE must be approved/accredited by the competent national authority or accreditation body in the EU member state where membership occurs depending on the applicable legal regulations.

To ensure that the specifications of the certification scheme are binding for the economic operators and the certification bodies, both are integrated into the SURE-EU scheme via standard contracts in which the rights and duties of both parties are precisely defined.

The figure below provides an overview of the structure and function of the SURE-EU system:

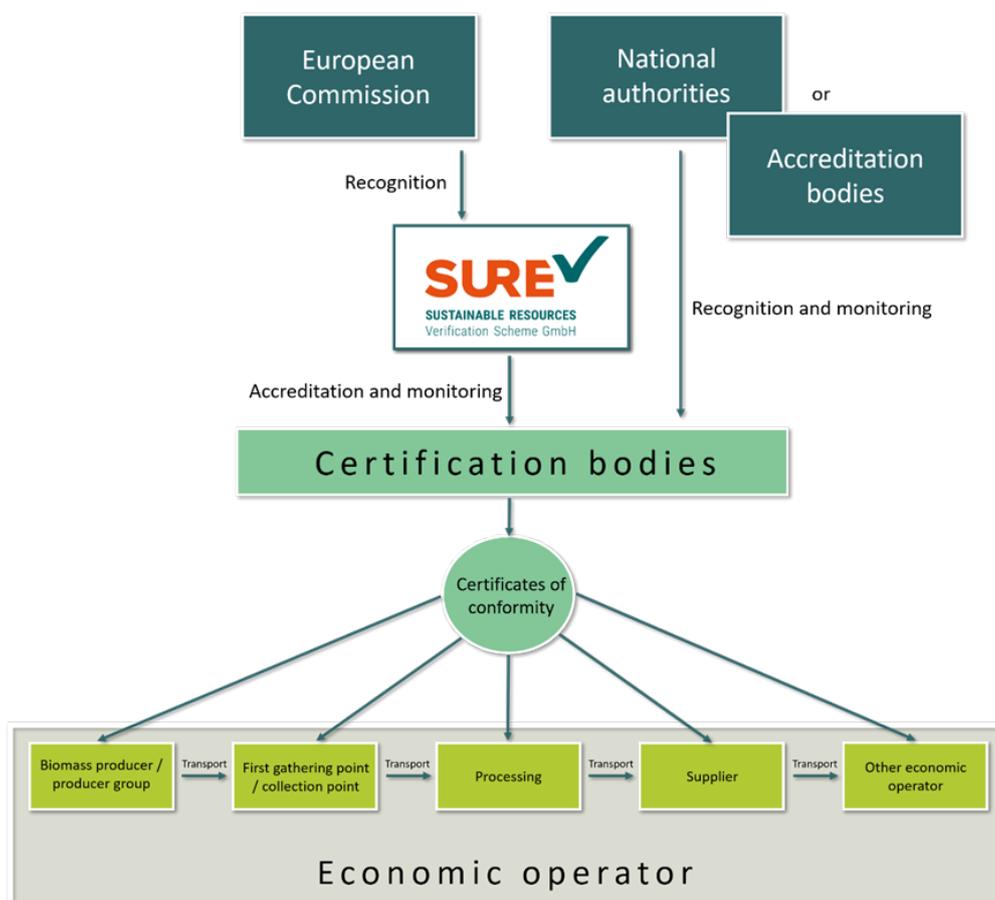


Figure 2: Structure and function of the SURE system

The production and supply chain for solid and gaseous biomass fuels includes the following operators:

✓ **Agricultural biomass producers**

Producers of agricultural biomass own and/or use farmland on which biomass is cultivated and harvested as a raw material for the production of solid or gaseous biomass fuels. They are required to provide detailed information on the type, location and size of the fields used to produce sustainable biomass and, if applicable, provide the status of the farm with respect to the requirements and standards under the scope of the provisions under the items water, soil and carbon stock, biodiversity, minimum level of landscape maintenance and plant protection products set out in Annex II to Regulation (EC) 1306/2013 of 17 December 2013, which comply with the statutory management requirements and the standards for good agricultural and environmental condition (GAEC). SURE reserves the right to adapt the reference for the proof of land status to the current legal framework of the Common Agricultural Policy if the legal framework for EU agricultural policy changes.

For certification purposes, they also have to grant access to all data and information related to the production and traceability of sustainable biomass.

Producers can be certified as individual producers or as a group of producers. The requirements for verification are described in detail in the SURE document “Scheme principles for the certification process – Requirements and specifications”.

✓ ***Forest biomass producers***

Producers of forest biomass manage forested areas to grow or harvest forest biomass as a raw material for solid or gaseous biomass and have full power of disposition over the land. They are required to provide detailed information on the type, location and size of the land used for the production of sustainable biomass and, where applicable, the risk status of the production area in accordance with the requirements of the SURE-EU scheme for assessing the risk of non-sustainable production of forest biomass.

Producers of forest biomass can affirm their compliance with the requirements of Revised Directive (EU) 2018/2001 as part of a first-party audit, but are subject to inspections in the SURE-EU system to ensure compliance with the above criteria. To this end, they also have to grant access to all data and information related to the production and traceability of sustainable biomass.

Producers can be certified as individual producers or as a group of producers. The requirements for verification are described in detail in the SURE document “Scheme principles for the certification process – Requirements and specifications”.

✓ ***Producers of waste and residues from biomass***

Biomass waste and residues producers are companies that produce waste and residues from biomass as defined in Revised Directive (EU) 2018/2001 during the course of their operations and deliver them to collection points. Waste and residue producers must prove that the biomass complies with the requirements of Revised Directive (EU) 2018/2001.

Producers are therefore subject to inspection and are checked during the annual inspection of the collection point at least once a year (max. 12-month period).

The requirements for verification are described in detail in the SURE document “Scheme principles for the production of waste and residues from biomass”.

✓ ***First gathering points of agricultural or forest biomass***

First gathering points receive biomass from the producer for resale or further processing. Even if the biomass is supplied directly to a storage or conversion facility

on behalf of a first gathering point, the first gathering point is subject to certification as what is known as an “interface”.

The first gathering points are responsible for determining the origin, quality and quantity of the supplied sustainable biomass. In the case of forest biomass economic operators who collect forest biomass (including forest residues) directly from the producer or harvest the biomass in the forest without being the forest manager, these are defined as first gathering point.

SURE spot-checks the conformity of the proof from the production companies that the biomass declared as sustainable meets the required criteria. (The requirements for verification are described in detail in the SURE document “Scheme principles for the certification process – Requirements and specifications”.) In this case, first gathering points and the affected producers of forest biomass also have to grant access to all data and information related to the production and traceability of sustainable biomass.

First gathering points are required to set up a mass balancing system to document all consignments of sustainable biomass. First gathering points are audited by a certification body at least once a year (max. 12 months after the start of the validity of the certificate). The gathering points or storage facilities maintained by the first gathering point are also included in the annual certification (see the SURE document “Scheme principles for the certification process – Requirements and specifications”).

First gathering points are issued a certificate as proof that they satisfy the scheme requirements.

✓ ***Waste and residue collection points***

Collection points from which waste and residues are collected for further processing in the biomass fuel chain are subject to certification.

The collection points are responsible for determining the origin, quality and quantity of the supplied sustainable biomass. They are required to set up a mass balancing system to document all consignments of sustainable biomass. Collection points are audited at least once a year (max. 12 months after the start of the validity of the certificate) by a certification body. The gathering points or storage facilities maintained by the collection point are also included in the annual certification (see the SURE document “Scheme principles for the certification process – Requirements and specifications”)

Collection points have to start calculating the GHG emission savings (collection and distribution process) if the waste and residues are to be used in electricity and heat generation plants that are required to reduce greenhouse gas emissions. They

must also ensure that the biomass they receive as “waste and residues” from other economic operators outside the “chain of custody” are correctly declared in accordance with Communication COM(2007) section 59.

Other specific requirements are set out in the documents “Scheme principles for the production of waste and residues from biomass” and “Scheme principles for the certification process – Requirements and specifications”.

Collection points are issued a certificate as proof that they satisfy the scheme requirements.

✓ ***Biomass processing plants***

Plants that process agricultural or forest biomass or waste and residues from biomass receive biomass from the upstream process chain for further processing and resale. As an interface, processing plants are subject to certification.

The processing plants are responsible for determining the origin, quality and quantity of the supplied sustainable biomass. They are required to set up a mass balancing system to document all consignments of sustainable biomass. Processing plants are audited at least once a year (max. 12 months after the start of the validity of the certificate) by a certification body. The gathering points or storage facilities maintained by the processing plant are also included in the annual certification (see the SURE document “Scheme principles for the certification process – Requirements and specifications”).

Processing plants are issued a certificate as proof that they satisfy the scheme requirements.

✓ ***Suppliers before and service providers after the last interface***

Suppliers are economic operators who supply and transport sustainable biomass or biomass fuels to the next recipient. A distinction is made in the scheme between suppliers before the last interface and service providers after the last interface.

- *Suppliers before the last interface* (after the first gathering point or collection point) are economic operators who supply biomass to the next recipient between the first gathering point and the last interface.
- *Service providers after the last interface* are economic operators who supply the electricity and/or heat produced from sustainable biomass fuels to the next recipient up to the last interface.

Suppliers before the last interface may handle sustainable biomass (storage, mixing) without converting the biomass. This definition also includes intermediate suppliers/phases that do not “physically” handle the biomass.

Suppliers are audited at least once a year (max. 12 months after the start of the validity of the certificate) by a certification body. Suppliers are issued a certificate as proof that they satisfy the scheme requirements.

✓ **Conversion plants**

Conversion plants are plants that generate electricity or heat from sustainable biomass fuels. These include biomass installations in the case of electricity or heat production from solid biomass fuels and biogas installations in the case of electricity and heat production from gaseous biomass fuels.

Conversion plants must establish a mass balancing system that records all supplies of sustainable biomass before conversion or the production of electricity or heat from this biomass. They calculate, if required, their specific GHG emissions or use partial default values. As the “last interface”, they must also calculate the GHG emission saving for the entire production and supply chain and issue a sustainability certificate for the electricity or heat biomass fuel unit in question, the form and content of which comply with the specifications of the relevant competent supervisory authorities.

Every conversion plant (regardless of its legal status, e.g. as a subsidiary of a group) is required to be certified annually (max. 12 months after the start of the validity of the certificate).

Conversion plants are issued a certificate as proof that they satisfy the scheme requirements.

✓ **Logistic service providers**

Pure logistics service providers who do not take ownership of the biomass, but merely transport it on behalf of the customer, are not subject to certification. However, they are required to present information about the transport routes and means of transportation upon request if an economic operator decides to calculate his actual GHG emissions (they must be documented in the transport order). They also undertake not to mix the goods with biomass from other economic operators.

Logistic facilities (and the use of them) as well as logistic service providers who collect waste and residues from point of origins on behalf of a collection point, without themselves becoming the owner of the waste or residual materials, are subject to inspection as part of the collector's audit, see SURE “Scheme principles for the certification process” (section 3.1.3 and 3.1.4).

5.8 Registration and certification

Economic operators who intend to use the SURE-EU system must register on SURE's website (www.sure-system.org).

SURE 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 non-conformities (see also section 6.5).

SURE only concludes a scheme contract with the economic operator if the information provided is complete and true. In parallel, the latter must commission a certification body recognised by SURE to verify system conformity with the requirements of the SURE-EU system. The selected certification body must confirm to SURE that it was commissioned with certification by the company in question.

Once these steps are completed and SURE and the economic operator have signed a scheme contract, the commissioned certification body conducts an audit to check conformity with the requirements defined in the SURE document "Scheme principles for the certification process – Requirements and specifications".

Once the certification body has reached a positive certification decision and the audit report has been entered into the SURE database, the certification body issues a certificate to the economic operator in accordance with the SURE standard and uploads it immediately to the SURE certificate platform (www.sure-system.org).

Every certificate saved in the SURE database contains the following information at a minimum:

- ✓ Status of the certificate [valid/suspended/withdrawn/expired or terminated]
- ✓ Unique identifier
- ✓ Name of the holder
- ✓ City
- ✓ Postcode
- ✓ Country
- ✓ Valid from [date]
- ✓ Valid to [date]
- ✓ Certified as [scope of validity according to the code table]
- ✓ Name of the issuing certification body
- ✓ Type [inspection certificate or certificate]

Important: Merely registering, signing a contract or successfully completing inspection does not authorise an economic operator to supply sustainable biomass or sustainable biomass fuels or to sell electricity and/or heat produced from sustainable biomass under the SURE-EU system. Sustainable biomass or biomass fuels or electricity or heat from sustainable biomass may not start being supplied in the SURE-EU system until a valid certificate is available.

Certification is valid for 12 months. Renewed certification requires another complete inspection in which, among other things, the transactions in the last 12 months are reviewed. This includes all business transactions relating to sustainable biomass or biomass fuels or the generation of electricity and/or heat from sustainable biomass fuels.

The system participants in the SURE system must cooperate with the European Commission and the competent authorities of the Member States. This includes granting access to the premises of economic operators where requested as well as making available to the Commission and the competent authorities of the Member States all information needed to fulfil their tasks under Revised Directive (EU) 2018/2001 and of Article 17 of the Implementing Regulation (EU) 2022/996, including the submission of all relevant data to examine whether the sustainability and green-house gas emissions saving criteria in relation to a particular consignment are met, if requested.

The figure below provides an overview of the registration and certification process:

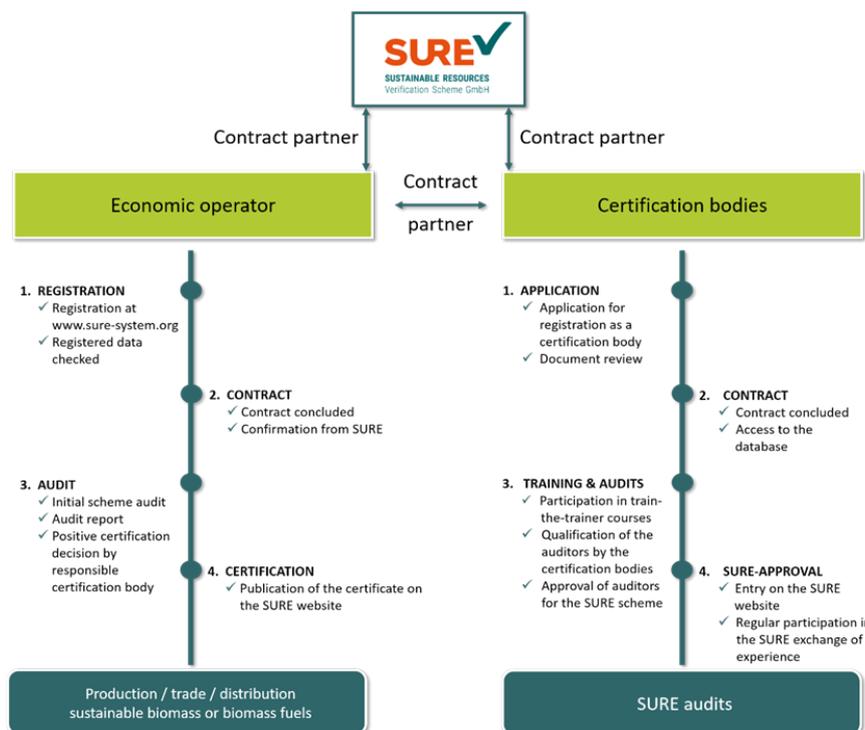


Figure 3: Registration and certification processes (simplified diagram)

The exact order of the certification process is outlined in the SURE document “Scheme principles for the certification process – Requirements and specifications”.

5.9 Other voluntary schemes and national schemes

Where part of the supply chain relies on other **voluntary schemes**, SURE accepts evidence of voluntary schemes recognised in accordance with Article 30(4) of Revised Directive (EU) 2018/2001, only to the extent of the scope of their recognition.

If an economic operator wants to use biomass certified under another **national scheme**, it can only be recognised in the SURE-EU scheme if that national scheme has been recognised in accordance with Articles 29(2) to (7) and (10) of Revised Directive (EU) 2018/2001 and the GHG savings thresholds set in Article 29a, and with the criteria for certification of low ILUC-risk biofuels, bioliquids and biomass fuels set out in Delegated Regulation (EU) 2019/807.

In addition, the economic operator must ensure that the same information about the sustainability properties along with the proof of these properties exist for these consignments with biomass or biomass fuels as under the scope of the SURE-EU scheme.

6 Measures to ensure transparency and scheme integrity as well as prevent misuse and fraud

To meet the transparency requirements of legislators, but even more importantly, our own standards for an integral voluntary scheme, SURE follows different guidelines.

6.1 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 SURE-EU system. 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.

6.2 Transparency in scheme membership

SURE concludes written contracts with the scheme participants (economic operators) and with the certification bodies active in the scheme. These contracts clearly stipulate the rights

and obligations of the respective parties (see also the SURE document “Scheme principles for integrity management”).

6.3 Transparency in scheme administration

The SURE system management is always able to give authorised groups information about the status of the participants, inspections and sanctions.⁶

SURE also satisfies the information and reporting requirements set forth in Article 30(5) of Revised Directive (EU) 2018/2001 and Annex III of Implementing Regulation (EU) 2022/996 and compiles and submits the information to the competent bodies of the European Commission within the specified period (by April 30 of the year following the reporting year).⁷

These include:

- a) the independence, modalities and frequency of audits, both in relation to what is stated on those aspects in the scheme documentation, at the time the scheme concerned was approved by the Commission, and in relation to industry best practices
- b) the availability, experience and transparency in the application of rules and procedures for identifying and dealing with non-compliance by economic operators in the SURE scheme, in particular with regard to situations or allegations of serious misconduct by scheme members
- c) transparency, particularly in relation to the accessibility of the scheme, the availability of translations in the applicable languages of the countries and regions from which raw materials originate, the accessibility of a list of certified operators and relevant certificates and the accessibility of auditor reports
- d) stakeholder involvement, in particular with a view to consulting indigenous and local communities before decisions are made, during the design and revision of the scheme and during the audit and responding to their input No single actor or group of actors may have a dominant position in the decision-making process. Decisions may only be taken where a quorum of the majority of stakeholders is reached.
- e) the overall robustness of the scheme, in particular given the rules on accreditation, qualification and independence of auditors and relevant scheme bodies
- f) where available, market updates of the scheme, the amount of feedstocks and bio-fuels [for SURE: biomass fuels] by country of origin and type, the number of participants

- g)** the simplicity and effectiveness of implementing a scheme that monitors proof of compliance with the sustainability criteria that the scheme gives to its members, such a scheme being a means of preventing fraud, particularly with regard to the identification, handling and follow-up of suspected fraud and other irregularities and, where appropriate, the number of cases of fraud or irregularities found
- h)** options for legal entities to be authorised to recognise and monitor certification bodies
- i)** criteria for the recognition or accreditation of certification bodies
- j)** rules on monitoring of certification bodies
- k)** ways to encourage or improve the promotion of good practices

For the criteria listed, SURE refers to the relevant sections in its scheme principles and will describe their implementation in the year under review.

SURE sets up rules and procedures (see SURE document “Scheme principles for integrity management”) to ensure effective follow up of the results of the internal monitoring and, where necessary, the application of sanctions. On the basis of the results of the internal monitoring, corrective measures must be taken at the level of the governance structure or of the internal monitoring process of the voluntary scheme in order to improve its functioning in the future. The results of the annual monitoring activities of the voluntary scheme must be summarised in the annual activity report submitted to the Commission. Further information and reporting requirements can be added. Where applicable, the template provided by the European Commission and published on the transparency platform will be used. The data required here is systematically collected by SURE from all participants in the scheme through *an annual survey using the SURE-EU database*. The audit reports of the certification bodies can be used to validate the plausibility of the reported data, as they also include an interview and on-site audit of the quantities of biomass or biomass fuels recorded/sold as sustainable (see also the SURE document “Scheme principles for integrity management”).

SURE must notify the Commission without delay of all substantial changes to the content of the scheme that might affect the basis for scheme recognition. These changes may include any of the following:

- a)** changes to the mandatory sustainability criteria covered by the scheme
- b)** extension of the scope of the scheme beyond what is described in the Implementing act, recognising the scheme
- c)** extension of the scope of feedstock or biofuels referred to in the original scheme documents when the risk profile of the added feedstocks differs
- d)** changes to the mass balance rules

- e) changes to auditing procedures or requirements for auditors
- f) changes in, or extension of the GHG calculation methodology
- g) any other change that could be considered to affect the basis for the recognition of the scheme

6.4 Transparency in scheme certification

A valid certificate is an essential prerequisite for trading in certified sustainable biomass or the production of electricity or heat from sustainable biomass fuels. The certification bodies responsible for issuing and monitoring the certificates ensure that the SURE database is updated on a daily basis (see also SURE document “Scheme principles for integrity management”).

Where audits identify critical or major non-conformities, SURE must publish an aggregated list of these non-conformities together with an action plan and a timeline for their correction, which is agreed with the economic operators concerned as part of the annual reporting to the European Commission. Specific information on the certificates or summary audit reports may be redacted to comply with personal data protection legislation. Economic operators whose certificates are withdrawn, terminated or expired must be listed on the website for at least 24 months after the withdrawal, termination or expiration date. Changes in the certification status of economic operators must immediately made public.

6.5 Assuring scheme integrity and preventing misuse and fraud

The SURE-EU system cannot accept responsibility for ensuring that the scheme participants and the involved certification bodies act in compliance with laws. When a scheme contract is signed, it must be assumed that the positive intention is to satisfy the scheme requirements.

At the same time, SURE has effective processes to reduce the potential of scheme violations, misuse and fraud and effectively combat these kinds of tendencies. These processes include the following:

✓ *The registration process for new, potential scheme participants*

Every potential scheme participant must disclose upon registration whether and to what extent the potential scheme participant or, if applicable, its legal predecessor, was already or is still a participant in another (voluntary) scheme within the past 5 years.

If the economic operator was or is a participant in another (voluntary) certification scheme within the past 5 years, the reason for the scheme change and all relevant

information, in particular the auditing reports and complete mass balance data, must be provided to SURE upon request. If the economic operator withdrew from another (voluntary) certification scheme before the first recertification, this must also be indicated.

In the case of suspensions or a scheme expulsion due to violations, SURE has the right to obtain detailed information about the violations in question from the previous and current certification scheme. This makes it possible to ensure that a SURE certificate is only issued when all of the violations found have been verifiably eliminated. These prerequisites are intended to prevent “scheme hopping”.

In addition, every potential scheme participant must indicate at the time of registration whether the company operated under a different legal form and/or another name in the last 5 years. This information must be provided to SURE as applicable.

Specifically, economic operators who want to participate in the SURE-EU system must provide the following information upon registration in relation to any pre-certification

- Information on whether the economic operator already participated in the SURE-EU system in the last 5 years under a different company name, legal form or VAT ID (with information on the previous company name and the previous VAT ID)
 - Information on whether a valid or suspended certificate from another scheme recognised by the European Commission or a national authority is available (with information on whether special audits have taken place during the validity period)
- Information on whether a certificate that existed in the past (last 5 years) ended normally or whether it was voluntarily surrendered before its expiry date
- Information on whether in the past (last 5 years) a certificate has been withdrawn as a result of a violation
- Information on a previously found critical or major non-conformity

This information is verified by SURE.

SURE excludes economic operators from participating in the SURE-EU system either by terminating the scheme contract or refusing participation in the following cases:

- they provide incorrect or incomplete information in the registration process, or
- they or their legal predecessor failed the initial audit under another scheme, unless such initial audit took place more than 3 years before the application or

if in the meantime the other scheme ceased its certification activities, which prevented the economic operator for reapplying. In this case, SURE reserves the right to request justification for the failed initial audit and to decide whether to accept the applicant on a case-by-case basis. If SURE accepts the justification of the economic operators and decides to assess their application, the scope of the initial audit must be adjusted to cover all relevant issues and specifically focus on the shortcomings identified in the initial audit that they failed in the other scheme, or

- they or their legal predecessor withdrew from another scheme before the first surveillance audit took place, unless the operator can prove that it had a valid reason for doing so. If SURE accepts the justification provided by the economic operator, the scope of the initial audit must be adjusted to cover all relevant issues of the surveillance audit.

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

For the systematic monitoring of GHG balances and the GHG savings declared in the proofs of sustainability, the scheme operator envisages close cooperation with the national authorities.

✓ ***Integrity management in the SURE system***

In addition to the scheme violations discovered during regular inspections carried out as part of the certification process, complaints of any kind can also trigger additional inspections or other measures, which are detailed in the integrity management document. As part of its integrity management, SURE has established a complaint management system.

The ultimate aim of the SURE sanction system is to effectively counteract proven scheme violations. This is described in more detail in the SURE document “Scheme principles for integrity management”.

✓ ***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 only be used by 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.

6.6 Measures to ensure the scheme integrity of certification bodies and scheme participants

SURE has developed measures to ensure the scheme integrity of certification bodies and scheme participants, which are described in detail in the SURE document “System principles for integrity management”.

SURE explicitly emphasises that accreditation is a prerequisite for certification bodies to participate in the SURE-EU system. In this context, the certification bodies are subject to regular monitoring by the national authority or the European Commission.

6.7 Supporting the European Commission

SURE supports the Commission in fulfilling its duties set out in Article 30(8) and Article 30(10) of Revised Directive (EU) 2018/2001.

The implementing provisions, in particular those relating to standards for reliability, transparency and independent auditing adopted by implementing acts must be implemented by SURE within the given timeframe.

At the request of the European Commission, SURE will help to verify that the SURE-EU system is operating in accordance with regulations and to assess compliance with sustainability and greenhouse gas mitigation requirements for certain consignments applied for under the SURE-EU system.

The procedures in the SURE-EU system require detailed documentation of all relevant information. By concluding the scheme contract, economic operators agree that SURE will make all relevant information, such as auditing reports or greenhouse gas calculations, available to the competent authorities or the European Commission upon request.

7 Costs for participating companies

The scheme sponsor of the SURE-EU scheme represents the main economic groups affected by the sustainability certification through its shareholders. It is absolutely in the basic interest of these shareholders not to initiate any unreasonable or unnecessary burdens for the member companies arising from the SURE-EU scheme.

Accordingly, the fees charged for using the SURE scheme are calculated on the basis of self-sustaining operation of the scheme. Generating profit is not the primary business objective

of the scheme operator. Fees are set by the executive management in consultation with the Technical Committee and the shareholders' meeting.

The participant fees are shown transparently in a fee schedule that every interested company has acknowledged before joining the scheme.

The costs for the neutral inspection conducted by approved certification bodies are not defined by the SURE-EU scheme but are based on the principle of supply and demand in the competition between the certification bodies. To prevent competition driven solely by price at the expense of certification quality, SURE systematically evaluates the time spent for an audit and scrutinises or disputes audit times that are consistently short (see section 6.5).

8 Relevant documents

The documentation structure of the SURE system includes the following:

Labelling	Document
General scheme principles	
GSP-B-en-3.1	Scope and basic scheme requirements of the SURE system
GSP-CP-en-3.0	Scheme principles for the certification process – Requirements and specifications
GSP-IMS-en-3.0	Scheme principles for integrity management
Specific scheme principles	
SSP-AGRI-en-3.0	Scheme principles for the production of agricultural biomass
SSP-FOREST-en-3.0	Scheme principles for the production of forest biomass
SSP-WaR-en-3.0	Scheme principles for the production of waste and residues from biomass
SSP-USE-en-3.1	Scheme principles for the use, processing and distribution/trade of biomass fuels and their conversion to electricity and heat
Technical guidance documents	
TG-DEF-en-3.0	Definitions in the SURE system
TG-MASS-en-3.0	Technical guidance for mass balancing
TG-GHG-en-3.0	Technical guidance for greenhouse gas calculation
TG-RA-en-3.0	Technical guidance for the assessment of the risk of unsustainable production of forest biomass
TG-READ-en-2.0	Technical guidance for remote audits
TG-HR-en-1.0	Technical guidance for areas with harvesting restrictions
TG-GF-en-1.0	Technical guidance on the implementation of Article 29 (15) of Directive (EU) 2023/2413 (RED III) - Grandfathering clause -
Checklists	
CL-AGRI-en-3.1	Checklist: Agricultural biomass producers
CL-FOREST-en-3.1	Checklist: Forest biomass producers
CL-WaR-en-3.0	Checklist: Producer of waste and residues
CL-USE-en-3.1	Checklist: Interfaces that use biomass fuels
Self-declarations	
SD-AGRIa-en-3.1	Self-declaration for producers of agricultural biomass (CAP Conditionality))
SD-AGRIb-en-3.1	Self-declaration for producers of agricultural biomass (no CAP Conditionality))
SD-FORESTa-en-3.1	Self-declaration for producers of forest biomass (low-risk)
SD-FORESTb-en-3.1	Self-declaration for producers of forest biomass (specified-risk)
SD-WaR-en-3.1	Self-declaration for producers of waste and residues
SD-AGRIa-en-1.0 article 29 (15)	Self-declaration for producers of agricultural biomass (CAP Conditionality) Article 29 (15)
SD-AGRIb-en-1.0 article 29 (15)	Self-declaration for producers of agricultural biomass (no CAP Conditionality) Article 29 (15)
SD-FORESTa-en-1.0 article 29 (15)	Self-declaration for producers of forest biomass (low-risk) Article 29 (15)
SD-FORESTb-en-1.0 article 29 (15)	Self-declaration for producers of forest biomass (specified-risk) Article 29 (15)

Self-Statement for first party audit FOREST producer	
SSt-FORESTa-en-1.0	Self-statement for first-party audit for producers of forest biomass (low-risk)

Table 1: Overview of the document structure of SURE. The current versions of the SURE scheme principles are published on the www.sure-system.org website.

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

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

9 References

1

EUROPEAN COMMISSION (2018): Directive (EU) 2018/2001 to promote the use of energy produced from renewable sources, Article 2 (27): Available at: <https://eur-lex.europa.eu/legal-content/de/TXT/?uri=CELEX:32018L2001> (last accessed on 19.05.2020).

2

EUROPEAN COMMISSION (2018): Directive (EU) 2018/2001 to promote the use of energy produced from renewable sources, Article 2 (24): Available at: <https://eur-lex.europa.eu/legal-content/de/TXT/?uri=CELEX:32018L2001> (last accessed on 19.05.2020).

3

A current list of countries in which the SURE-EU scheme is not applicable can be found at www.sure-system.org

4

At the time the scheme documentation was created, the scheme had not yet been recognised.

5

Information on setting up a management system of this kind can be found in points 2 and 5.2 of module D1 (“Quality assurance in the production process”) in Annex II to Directive 768/2008/EC on a common framework for the marketing of safe products in the EU.

6

EUROPEAN COMMISSION, DIRECTORATE-GENERAL FOR ENERGY (DG ENER) (2015): Letter to the voluntary certification schemes concerning transparency measures (12.03.2015). Available at: <https://ec.europa.eu/energy/sites/ener/files/documents/PAM%20to%20vs%20on%20transparency%20ARES%202015%201094930.pdf> (last accessed on 19.05.2020).

7

EUROPEAN COMMISSION, DIRECTORATE-GENERAL FOR ENERGY (DG ENER) (2015): Letter on reporting requirements for voluntary certification schemes (01.09.2015). Available at: <https://ec.europa.eu/energy/sites/ener/files/documents/PAM%20to%20vs%20annual%20reporting.pdf> (last accessed on 19.05.2020).

Annex I: Coding of the scope of certificates and inspection certificates in the SURE-EU system

Scope ID	Description
1101	Group manager of agricultural biomass producers
1102	Agricultural biomass production operation
1201	Group manager of forest biomass producers
1202	Forest biomass production operation
1301	Group manager of producers of waste and residues
1302	Producer of waste and residues
Phase: First gathering point/collection points	
2101	First gathering point of agricultural biomass producer
2201	First gathering point of forest biomass
2301	Collectors of waste and residues
Phase: Treatment/processing operation	
3101	Processing plant for agricultural biomass
3102	Pellet production of agricultural biomass
3103	Briquet production of agricultural biomass
3201	Processing plant for forest biomass
3202	Pellet production of forest biomass
3203	Briquet production of forest biomass
3301	Processing plant for waste and residues
3302	Pellet production of waste and residues
3303	Briquet production of waste and residues
3401	Biogas plant (raw biogas, fermentation)
3402	Biogas plant (raw biogas, gasification)
3403	Biomethane processing plant
Phase: Distribution/trade and logistics	
4001	Supplier before the last interface
Phase: Conversion electricity/heat (cooling)	
5101	Electricity from biomass (solid biomass)
5102	Heat from biomass (solid biomass)
5201	Electricity from biogas (raw biogas)
5202	Heat from biogas (raw biogas)
5301	Electricity from biomethane
5302	Heat from biomethane
Phase: Service electricity/heat (cooling)	
6001	Electricity trader
6002	Heat trader

Phase: Technical Scopes	
7001	Greenhouse gas calculation (default values)
7002	Greenhouse gas calculation (actual values)
7003	Soil carbon accumulation (Farm with esca practises)
7101	Grandfathering rules "RED II sustainability criteria"
7102	Grandfathering rules "RED II GHG criteria"

Table 2: List of the scopes in the SURE-EU system

Annex II: Revision Information

Revision Information Version 3.1

Section	Change	Date of change
Section 8	Add “Technical guidance on the implementation of Article 29 (15) of Directive (EU) 2023/2413 (RED III) - Grandfathering clause - “	10.10.2025
Annex I	Add technical scopes 7101 Grandfathering rules “RED II sustainability criteria”and 7102 Grandfathering rules “RED II GHG criteria”	10.10.2025

Revision Information Version 3.0

Section	Change	Date of change
whole document	Version 2.0 updated to 3.0	19.05.2025
whole document	Correction of minor typos	19.05.2025
whole document	Updated reference to Revised Directive (EU) 2018/2001 (RED III)	19.05.2025
Section 3	added: The SURE-EU scheme can generally be used globally. SURE reserves the right to exclude countries from the SURE-EU scheme based on a risk assessment and geopolitical developments. A country that is eligible under the SURE-EU scheme must fulfil the corresponding requirements. The necessary information on the specific regional and national conditions in connection with soil classification, production, cultivation and social issues is available. The geographical scope refers to the place where the raw material was grown/collected or processed.	19.05.2025
Section 4	amended: [...] At the annual shareholders’ meetings, the chair must report to the shareholders on the activities of the previous financial year. [...]	19.05.2025
Section 5.9	updated reference: [...] in accordance with Articles 29(2) to (7) and (10) of Revised Directive (EU) 2018/2001 and the GHG savings thresholds set in Article 29a, [...]	19.05.2025
Section 6.5	amended: [...] information on a previously found critical or major non-conformity [...]	19.05.2025

	<p>added:</p> <p>[...]- - they or their legal predecessor withdrew from another scheme before the first surveillance audit took place, unless the operator can prove that it had a valid reason for doing so. If SURE accepts the justification provided by the economic operator, the scope of the initial audit must be adjusted to cover all relevant issues of the surveillance audit.</p> <p>[...]</p>	
Section 8	Updated list of documents	19.05.2025

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Cover photo

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