

REPORT

to the European Commission
according to:

Directive 98/70/EC Article 7c, section 6,
modified by Directive (EC) 2015/1513

2021

Published by:

SUSTAINABLE RESOURCES
Verification Scheme GmbH

responsible for the operation of the voluntary scheme 'SURE-EU', recognized by the European Commission according to Commission Implementing Decision (EU) 2022/605 of April 8th, 2022 on recognition of the 'SURE-EU' voluntary scheme for demonstrating compliance with the sustainability criteria under Directives (EU) 2018/2001 of the European Parliament and of the Council.

Bonn, April 30th, 2022

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I Introduction

Voluntary certification schemes have been established since 2010 for providing evidence of compliance with the sustainability requirements laid down in Directives 98/70/EC and 2009/28/EC.

Therefore, the Commission has been mandated to require voluntary schemes in accordance with Article 7c(6) of Directive 98/70/EC and Article 18(6) of Directive 2009/28/EC which has been modified by Directive (EC) 2015/1513, to report regularly on their activity.

The revised Directive (EU) 2018/2001 continues the reporting obligations on voluntary schemes. The European Commission has updated the reporting criteria for future reporting by a delegated act on voluntary schemes, which is not yet formally set into force, the current report still follows the established requirements and structure.

The reports will be made public in order to increase transparency and to improve oversight by the Commission. Furthermore, such reporting would provide the necessary information for the Commission to report on the operation of the voluntary schemes with a view to identify best practice and submit, if appropriate, a proposal to further promote such best practice.

Voluntary schemes must report the following information in their annual activity reports to the Commission:

- 1 a list of their certification bodies used for independent auditing, indicating for each certification body by which entity or national public authority it was recognized and by which entity or national public authority it is monitored.

Further information is requested concerning:

- 2 rules on the independence, method and frequency of audits as approved by the Commission upon accreditation of the voluntary scheme and any changes to them over time to reflect Commission guidance, the modified regulatory framework, findings from internal monitoring on the auditing process of certification bodies and evolving industry best practice.
- 3 rules and procedures for identifying and dealing with non-compliance by economic operators and members of the scheme.
- 4 evidence of fulfilling the legal requirements on transparency and publication of information in line with Article 6.
- 5 stakeholder involvement, in particular on the consultation of indigenous and local communities prior to decision-making during the drafting and review of the scheme as well as during audits and the response to their contributions.

- 6 overview of the activities carried out by the voluntary scheme in cooperation with the certification bodies in order to improve the overall certification process and the qualification and independence of auditors and relevant scheme bodies.
- 7 market updates of the scheme, the amount of feedstock, biofuels, bioliquids and biomass fuels certified, by country of origin and type, and the number of participants.
- 8 overview of the effectiveness of the implementing system put in place by the governance body of the voluntary scheme in order to track proof of conformity with the sustainability criteria that the scheme gives to its member(s). This shall cover, in particular, how the system effectively prevents fraudulent activities by ensuring timely detection, treatment and follow-up of suspected fraud and other irregularities and where appropriate, the number of cases of fraud or irregularities detected.
- 9 criteria for the recognition of certification bodies.
- 10 rules on how the internal monitoring system is conducted and the results of its periodic review, specifically on oversight of the work of certification bodies and their auditors as well as on the system of handling complaints against economic operators and certification bodies;
- 11 possibilities to facilitate or improve the promotion of best practices.
- 12 voluntary schemes certifying forest biomass must include information on the way the risk assessment required in article 29 (6) and (7) of the Directive (EU) 2018/2011 is made.

The following report collects all the requested information about the certification scheme SURE-EU in a structured way and allows the reader to verify quickly whether all required information has been provided.

It should be noted that the SURE-EU scheme has been recognized for the first time by the European Commission according to article 30 (4) of the Directive (EU) 2018/2001 (RED II) by a COMMISSION IMPLEMENTING DECISION (EU) 2022/605 of April 8, 2022. The scheme documents were developed according the RED II and went into force on July 1st, 2021. SURE started its operation under RED II after receipt of the positive assessment on July 1st, 2021 in frame of the recognition process under RED II Art. 30 (4).

II Requested Information

1 LIST OF CERTIFICATION BODIES RECOGNISED

An up-to-date list of all certification bodies recognised by SURE within the scope of the SURE EU scheme is publicly available on the SURE webpage:

<https://www.sure-system.org/en/contact/contact-details.html#certification-bodies> .

In table 1 (see Annex III-1) the extended list of **23** registered certification bodies until December 31st 2021 contains also information about the entity or national public authority it was recognised by, and which monitors its activities.

2 INDEPENDENCE, MODALITY AND FREQUENCY OF AUDITS

The requirements on certification bodies, auditors and audits in the frame of the SURE EU scheme are laid down in the document *“Scheme principles for the certification process - Requirements and specifications”*.

https://www.sure-system.org/images/Systemdokumente_EN/SchemePrinciples/GSP-CP-en-13_CertificationProcess_final.pdf

Independence and impartiality

The certification bodies conduct their inspections in accordance with the requirements of ISO 19011 (which is mandatory for accreditation). Conformity evaluations are carried out in line with the specifications of the ISO/ICE Guide 60.

Evaluations and decisions may not be affected by personal relationships, financial incentives or other types of influences. The certification bodies and the auditors are independent of the interfaces, operations and suppliers and free of all conflicts of interest and can furnish proof of this.

Technical and staffing requirements

The certification bodies have the respective equipment and infrastructure to review compliance with the system requirements and the requirements of *the Directive (EU) 2018/2001 (RED II)* and their corresponding directives for all participants in the value chain. The certification bodies have sufficient qualified staff that fulfil the requirements listed under item 4. The verification that these prerequisites are fulfilled requires suitable documents on the equipment of the respective certification body, its structure and its staff.

Principle of peer review

To ensure that the principle of peer review is upheld (separation of evaluation and certification), the certification body employs at least two natural persons, both registered as auditors within the SURE-EU scheme. This means that the final decision of a certification is not made by the same person who performed the audit. The certification body also appoints a person who has in-depth system knowledge and is responsible for communication with SURE.

Handling complaints and claims

The certification bodies must have an effective process in place for handling complaints and claims. This process is part of the QM system of the respective certification body and guarantees the fastest possible response if there are complaints and claims, and, if necessary, the introduction of corrective measures.

On the other side SURE provides a public Complaint Management System (CMS) where every type of complaint against SURE, one of the certification bodies or their auditors or an operator certified under the SURE-EU scheme can be addressed, see also document “Scheme principles for integrity management”:

https://www.sure-system.org/images/Systemdokumente_EN/SchemePrinciples/GSP-IMS-en-13_IntegrityManagement_final.pdf

Any appeal about a certification body’s decision, it’s performance or any other hint about misbehaviour and frauds impose immediate action by SURE according to the Integrity Management System (IMS), which is defined in the document *‘Scheme principles for integrity management’*.

Audit intervals

The certification body must conduct a full audit once a year (maximum time interval 12 month) to verify that the operations still satisfy the requirements for certification. In consequence the certificate issued after a successful audit has a validity period of 12 month, too. The re-certification audit is to be carried out ideally before the existing certificate expires so that the certification can be maintained by issuing a new certificate without a gap.

Imposed by several fraud cases in the frame of waste & residue based on biofuels in the last years (mainly UCO/UCOME) additional mandatory surveillance audits were imposed for operators – collectors and/or traders - which deal with waste and residues feedstock after their initial certification. For those dealing only with waste and residues a full surveillance audit is required latest 6 month after the initial certification. For those, dealing with both – waste and residues as well as virgin material – an additional surveillance audit is required 3 months after the initial certification.

In the frame of its IMS SURE is authorized to order special audits performed either by the certification body in charge or by another qualified body / person appointed by SURE to assess potential non-conformities arising from complaints or suspects reported from the market.

3 METHODS FOR IDENTIFYING AND DEALING WITH NON-COMPLIANCE

For neutral audit within the SURE-EU scheme appropriate audit criteria have been defined. These criteria were transferred into four types of checklists:

1. Checklist for Agricultural biomass producers
2. Checklist for Forest biomass producers
3. Checklist for Producers for Waste and Residues
4. Checklist for Interfaces that use biomass fuels

Auditors of the certification bodies are obliged to use the SURE checklists without any exemption. It is mandatory to provide SURE with a fully documented checklist as an audit report by uploading it into SURE's scheme database before a certificate can be uploaded to the database (see chapter 4).

The inspection criteria are classified, some of the criteria are defined as 'knock-out-criteria'. The classification of findings has been harmonized on request of the European Commission. Findings are flagged as:

- 'compliant' in case of complete conformity with a criterion
- 'minor' in case of a minor non-conformity with a criterion
- 'major' in case of a major non-conformity with a criterion
- 'critical' in case of a critical non-conformity with a criterion (= k.o.)

According to the auditor's finding for each criterion the result of the audit is calculated automatically. The result of an audit is also classified in three stages

- Level 1 → fully compliant
- Level 2 → partially compliant (minor deviations detected to be solved in between the certification period)
- Level 3 → non-compliant (due to knock-out-criteria or a certain level/volume of minor/major deviations)

The auditor is responsible to define and to monitor corrective action for all deviations detected. All corrective action agreed with the operator have to be documented in the corresponding table of the checklist. In case of the result 'non-compliant' the sanction procedure of the SURE-EU scheme – defined in document 'Scheme principles for integrity management' is launched.

As a mean of prevention against the risk of 'scheme hopping' SURE's approach of the registration process for new applicants has proved its worth.

Applicants to the SURE-EU scheme have to state any existing certificate and/or any withdrawn or suspended (before its regular expiry date) certificate as well as certificates under a different scheme which ended regularly at its expiry date and not due to non-conformities of another scheme recognized by the EU Commission. In all cases he has to grant access for SURE to all relevant information concerning this non-compliance by contacting the other certification scheme and/or the former

certification body in charge. In addition, these statements have to be made for the legal entity applying for the SURE-EU scheme as well as for other companies or precursor entities to prevent them from simple name change disguising an operator's prehistory.

A new certificate under the SURE EU scheme can only be issued if all non-compliances under the former scheme have been corrected and assessed by the new certification body in charge under special scrutiny. Any false statement about an applicant's certification history detected after the registration allows SURE to cancel the system contract and to withdraw the certificate with immediate effect.

Company data
Legal representative / Management
Contact persons
Pre-certification
Summary

PRE-CERTIFICATION

Over the last 12 months...

...we operated under a different company/name/legal form/VAT number.

Company name*

Tax ID

... we did not participate in any other certification scheme recognized by a national authority or the EU Commission for verification of the sustainability requirements of EU Directives 2009/28 ("RED I") or 2018/2001 ("RED II").

... we participated in a different certification scheme recognized by a national authority or the EU Commission for verification of the sustainability requirements of EU Directives 2009/28 ("RED I") or 2018/2001 ("RED II") and our certificate is currently valid.

Scheme recognized by a national authority

Scheme recognized by the EU Commission

Name of system*

Special audits took place in the last 12 months by the scheme operator: Yes No

... we participated in a different certification scheme recognized by a national authority or the EU Commission for verification of the sustainability requirements of EU Directives 2009/28 ("RED I") or 2018/2001 ("RED II") and our certificate...

... we participated in a different certification scheme recognized by a national authority or the EU Commission for verification of the sustainability requirements of EU Directives 2009/28 ("RED I") or 2018/2001 ("RED II") and our certificate was revoked due non-compliance with certification scheme requirements.

We hereby explicitly authorise SUSTAINABLE RESOURCES Verification Scheme to request all documents that affect our scheme participation from the operator of the certification scheme we previously used for inspection.

SUSTAINABLE RESOURCES Verification Scheme will automatically send you a declaration of consent which needs to be filled out and sent immediately to the following address [database\[at\]sure-system.org](mailto:database[at]sure-system.org).

SUSTAINABLE RESOURCES Verification Scheme explicitly states that participation in the SURE certification system is not possible without the above-mentioned consent to the transfer of documents from the previously used certification system.

I take note that in case of incorrect or incomplete information on previous certifications, SUSTAINABLE RESOURCES Verification Scheme reserves the right to terminate the system participation without notice.

We hereby explicitly authorise SUSTAINABLE RESOURCES Verification Scheme to request all documents that affect our scheme participation from the operator of the certification scheme we previously used for inspection.

SUSTAINABLE RESOURCES Verification Scheme will automatically send you a declaration of consent which needs to be filled out and sent immediately to the following address [database\[at\]sure-system.org](mailto:database[at]sure-system.org).

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I take note that in case of incorrect or incomplete information on previous certifications, SUSTAINABLE RESOURCES Verification Scheme reserves the right to terminate the system participation without notice.

Data Privacy

I have read and hereby accept the conditions of the [data privacy policy](#).

A confirmation of your registration will be sent to [REDACTED]@sure-system.org.

Fig. 1: extract from the updated registration portal with mandatory information on the prehistory of an applicant

4 TRANSPARENCY, PARTICULARLY IN RELATION TO THE ACCESSIBILITY OF THE SCHEME

To meet the transparency requirements of legislators, but even more importantly, our own standards for an integral certification scheme, SURE has defined a set of transparency measures which are defined in detail in the ‘Scheme principles for Integrity Management’

Transparency in scheme representation and documentation

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 scheme 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.

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.

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 with certification bodies assure that Member State authorities can supervise the operation of certification bodies as set out under Article 30(9) of the Directive.

If the European Commission will be required - upon request of a Member State, or its own initiative - to investigate whether the SURE-EU scheme operates according to the rules or to examine whether the sustainability and greenhouse gas emissions saving criteria in relation to a particular consignment are met, the appropriate access to relevant data e.g. such as audit reports and actual GHG calculations either from operators or from certification bodies is assured by contractual provisions.

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

Transparency in scheme administration

SURE uses a database to manage the certification scheme that documents all

- scheme participants including all of the dependent operational sites of each member registered
- all of the audits conducted regardless of result
- all certificates issued under the SURE-EU scheme
- all sanction measures

- market data relevant for the scheme’s reporting obligation to the European Commission The scheme management is always able to give authorised groups information about the status of the participants, audits and sanctions.

SURE also fulfils the officially specified information and reporting obligations stipulated in Directive (EU) 2018/2001 Article 30 (5) - even the details of the new report are not yet fixed - and creates and submits the information required here to the responsible offices of the European commission within the specified period (by 30 April of the year after the reporting year).

Transparency in scheme certification

A valid certificate is an essential prerequisite for trade with certified sustainable biomass or and biomass fuels. To make it possible for all economic operators to have a transparent and tamper-proof overview of all certificates issued in the SURE-EU scheme – 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.

The certification bodies responsible for issuing and monitoring the certificates guarantee that the overview is always up to date on a daily basis.

Certificates are listed with the following data (see also figure 2 below):

- Status of certificate (valid, suspended, expired/withdrawn)
- certificate’s identifier
- name of operator
- validity period
- scope of certification (type of operations)
- list of biomasses.
- name certification body
- PDF copy of certificate

CERTIFICATES AND INSPECTION CERTIFICATES

All certificates and inspection certificates issued in the SURE system can be found here.
A legend with a list of all abbreviations and an explanation of the symbols can be viewed [here](#).

Identifier: Company name: Country: Status: Valid from: Valid to:

Scope: Biomass: Certification body: Type:

Please notify us of certificates and inspection certificates that have allegedly been issued so that we can also improve the integrity of the SURE-systems in this way.

Identifier	Company name, country	Gültig von	Gültig bis	Scope	Biomass	Certification body	Type
✓ SURE-EU/DE-008/Z11928001	Zarges-Graf Recycling&Logistik, Germany	18/05/2022	17/05/2023	1201, 1301, 2201, 2301, 4001	FOREST WaR, FOREST	OmniCert Umweltgutachter	Z-SURE-EU
✓ SURE-EU/DE-010/Z45562201	energielenker BGA Zwei GmbH & Co. KG - BGA Worin, Germany	18/05/2022	17/05/2023	1101, 1301, 2101, 2301, 3101, 3401, 5101, 5102	WaR, AGRI	GUT Zertifizierungsgesellschaft für Managementsysteme mbH Umweltgutachter	Z-SURE-EU

Fig.2: extract from the online certificates database

5 STAKEHOLDER INVOLVEMENT

The SURE-EU scheme is supported by several branch organisations ([shareholders](#)) that largely represent the economic operators in the agriculture- and forestry sector as well as producers of heat and electricity from biomass fuels.

The scheme's operation is fully independent and not influenced by the shareholders. To make use of the specific branch expertise and to receive feedback from the operators SURE has established a [technical committee](#). The committee's expertise is essential to the SURE-EU scheme. Its primary task is to advise the executive management and initiate and promote the process of continuous improvement and the further development of the SURE-EU scheme. The scheme documents have to be adopted by the board before they're presented to the European Commission for recognition.

The process of shareholder as well as stakeholder involvement is defined in 'Rules on procedure' where – beside other items – SURE focuses in independence and impartiality to avoid any conflict of interest between the involved person and parties.

The shareholders assembled two times in 2021; the technical committee also twice in 2021.

Representatives of certification bodies, national authorities, scientists as well as NGO's and other parties potentially affected are invited to cooperate with SURE on this technical level. So far, SURE is not engaged in regions or countries where the interests of indigenous and local communities are potentially in conflict with the land-use for biomass production.

To harmonize and to 'calibrate' the certification bodies operating in the frame of the SURE- EU scheme regular meetings, so-called 'Exchange-of-Experience' (EoE) are organized, first time in 2022 after meaningful experiences with REDII-certification under the SURE-EU scheme could be gathered. Before, SURE contributed to the EoE of REDcert in 2021 where the implementation of the RED II and the development of the SURE-EU scheme were the most important topics in the EoE meetings. Two mandatory meetings of REDcert for each group of certification bodies (German speaking and English speaking) were held in 2021.

6 OVERALL ROBUSTNESS OF THE SCHEME

SURE provides a robust and reliable certification scheme which complies 100% with the European legal requirements concerning sustainable biomass fuels as well as with the expectations and needs of operators along the whole production chain, being also aware of the expectations of other third parties (see No. 5). This has been confirmed by the recognition of the SURE-EU scheme in April 2022.

Therefore, SURE follows the principle of 'active scheme management' by providing/requiring

- a consistent scheme documentation,
- a certification process according to principles of the European Co-operation for Accreditation (EA),
- a transparent scheme administration, regular reports and publications,
- a public database of certificates,
- a Complaint Management System (CMS) where all type of complaints against the SURE-

- EU scheme are managed,
- an Integrity Management System (IMS),
 - a Sanction System for handling major non-conformities.

Beside these documented and published tools for a robust scheme, SURE

- provides a broad service and support for operators and certification bodies under the SURE-EU scheme and
- has imposed a risk and crisis management system to handle all type of incidents which may affect SURE's image and integrity.

SURE's service includes training offers for operators as well as for certification bodies, for example 'Train-the-Trainer' seminars for certification body staff. The SURE team is available for individual support of operators and certification bodies via several communication channels.

With a view on the additional requirements of the 'COMMISSION IMPLEMENTING REGULATION on rules to verify sustainability and greenhouse gas emissions saving criteria and low indirect land-use change-risk criteria' (so-called 'Implementing Act') on the accreditation of certification bodies SURE is already cooperating with ANSI/ANAB¹ to establish an accreditation procedure for its certification bodies according to the provisions of the IAF International Accreditation Forum.

7 MARKET UPDATES OF THE SCHEME

The SURE-EU system has been developed as a "full scope" certification scheme in order to do reflect the heterogeneity of the bioenergy sector and all economic operators in the field of electricity and heat generation from biomass fuels that fall within the scope of Directive (EU) 2018 /2001 and to enable certification. The SURE-EU system can be applied on a global level and is not limited to individual countries or regions. Only the use of the SURE-EU system in Belarus and Russia has been temporarily suspended since March 14, 2022 due to the current geopolitical situation.

The different requirements that are placed on the respective production of agricultural and forestry biomass or waste and residues from biomass, as well as the respective obligations of the downstream economic operators are specified in the SURE-EU system via its scopes for which the economic operators register in the SURE database.

The generation of electricity and/or heat from sustainable biomass fuels can only be verified as sustainable if the entire supply chain, from the production of the biomass to the conversion plant, has been certified according to the principles of an EU-recognized voluntary or national scheme. This presents downstream interfaces in particular with the challenge of only being able to register biomass as sustainable if their own suppliers are already certified themselves and were therefore able to deliver sustainable biomass fuels.

In addition, proof of the use of sustainable biomass can only required within the framework of the national legislation of the EU member states. However, the transposition of the RED II into national

¹ ANSI/ANAB - ANSI National Accreditation Board

law was done only by a few member states until today. The economic operators on the market are accordingly cautious and wait for binding specifications in order to have more planning security.

While the electricity or heat generation plants usually have to provide evidence when national legislation comes into force, for closed (certified) supply chains the upstream economic operators must also prove compliance with the requirements of RED II. This in turn requires a sufficiently long lead time to inform all upstream suppliers about the obligation to provide evidence and, if necessary, to certify them. As a consequence, this can mean that thousands of economic operators in a member state are simultaneously striving for certification, and economic operators are already certified without being able to purchase or use sustainable goods.

Both effects - a lengthy development of certified supply chains with expected gaps for a large number of different biomass fuels, as well as the entry into force of the German Biomass Electricity Sustainability Ordinance BioSt-NachV from December 8, 2021 - can clearly be seen in the registrations with the SURE-EU system in 2021, the development of the audits and certifications already carried out and the reported quantities of sustainable biomass already used.

Since the beginning of 2021, a total of 1,915 economic operators have registered with SURE, mostly from Germany due to the implementation of national legislation. As expected, the development of registrations gained significant momentum at the end of the year due to the forthcoming entry into force of the German Biomass Electricity Sustainability Ordinance on December 8, 2021.

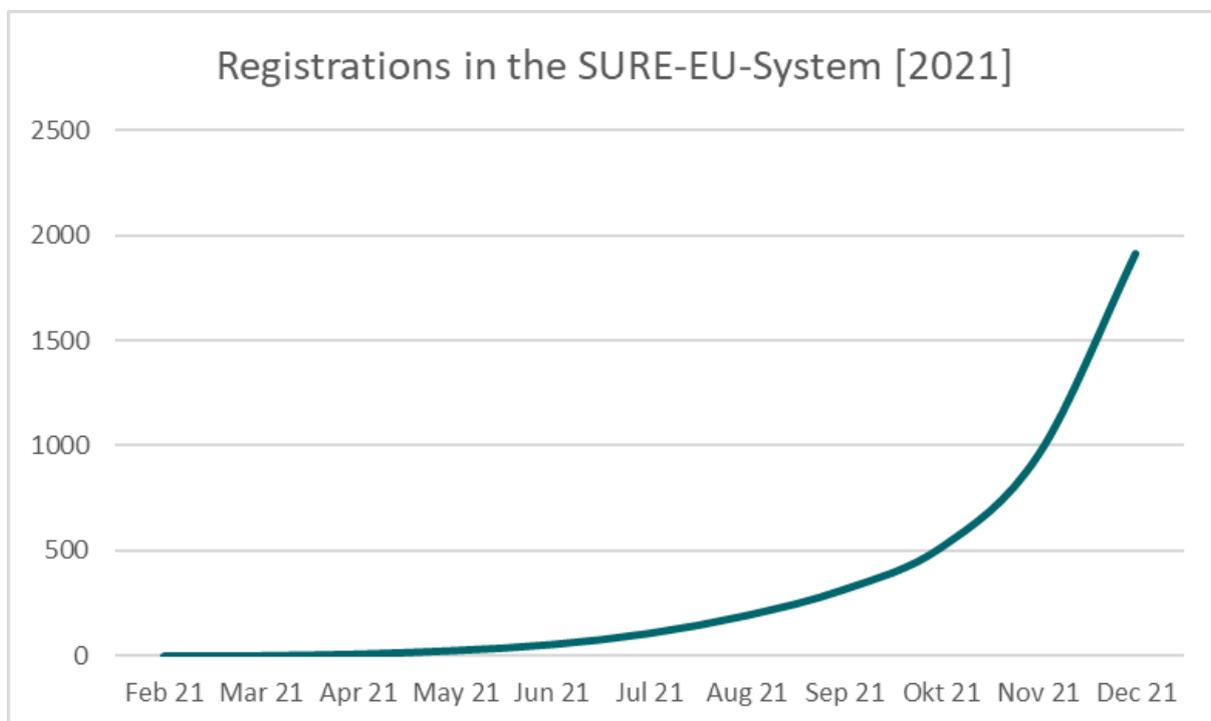


Fig.3: Registrations in the SURE-EU-System (2021)

As a new certification system, SURE was permitted to use the SURE-EU standard to demonstrate the requirements of Directive (EU) 2018/2001 with a positive technical assessment from July 1, 2021. Since then, up to December 31, 2021, 144 economic operators have been certified in a total of three EU member states (Germany, Poland, Spain).

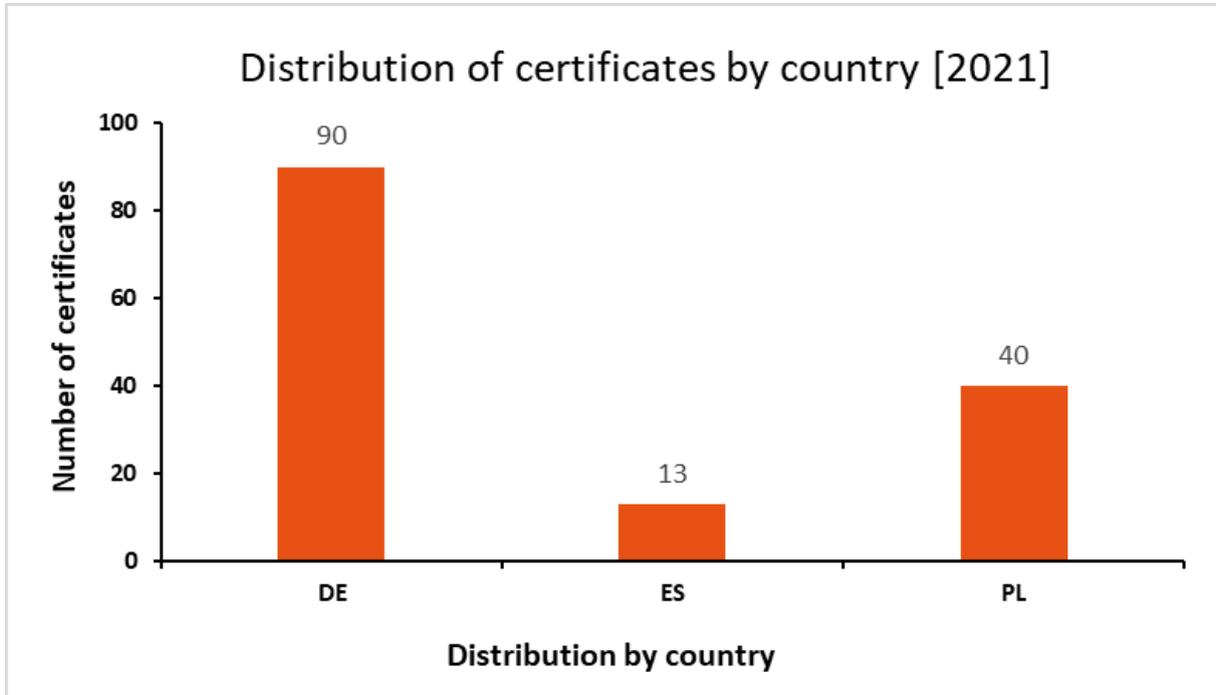
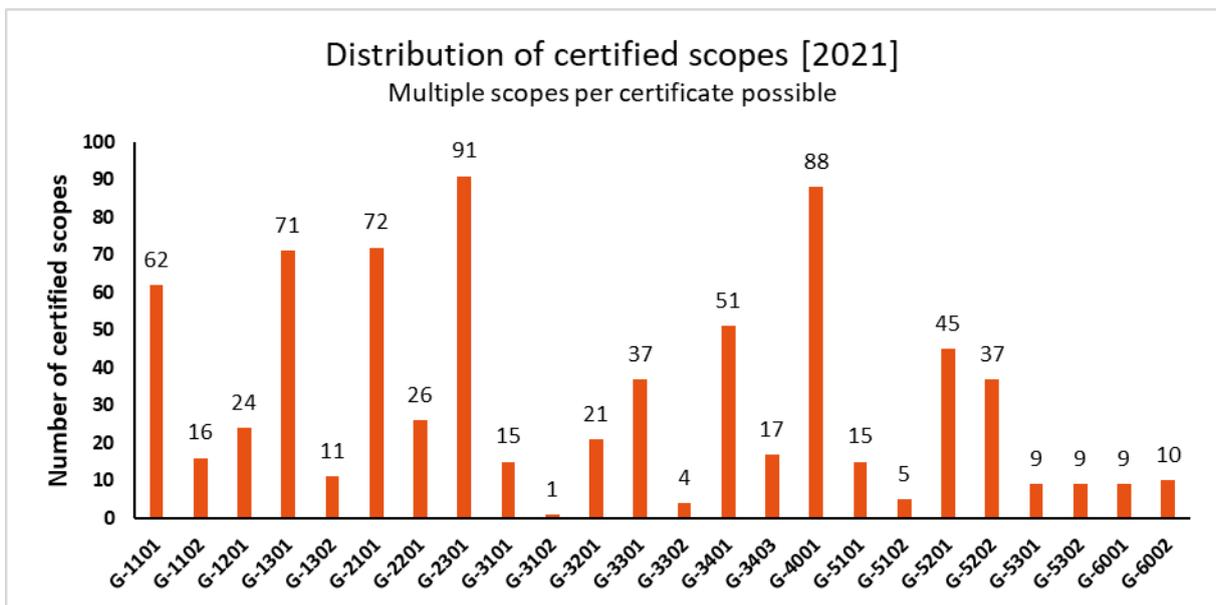


Fig.4: Distribution of certificates by country (2021)

A look at the certified scope shows that the area of electricity and heat generation from biogas and the corresponding upstream supply chain (especially liquid manure and agricultural feedstock) dominate in 2021.

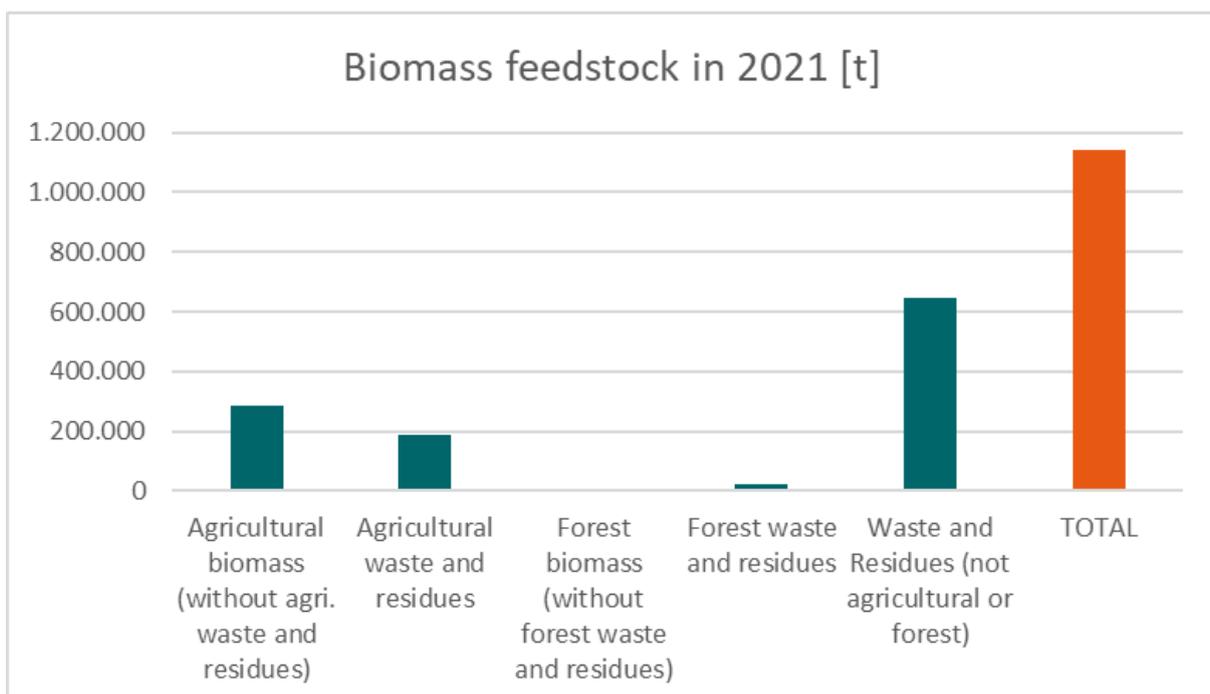


1101	Group manager of agricultural biomass producers	3102	Pellet production of agricultural biomass	3403	Biomethane processing plant
1102	Agricultural biomass production operation	3103	Briquet production of agricultural biomass	4001	Supplier before the last interface
1201	Group manager of forest biomass producers	3201	Processing plant for forest biomass	5101	Electricity from biomass (solid biomass)
1202	Forest biomass production operation	3202	Pellet production of forest biomass	5102	Heat from biomass (solid biomass)
1301	Group manager of producers of waste and residues	3203	Briquet production of forest biomass	5201	Electricity from biogas (raw biogas)
1302	Producer of waste and residues	3301	Processing plant for waste and residues	5202	Heat from biogas (raw biogas)
2101	First gathering point of agricultural biomass producer	3302	Pellet production of waste and residues	5301	Electricity from biomethane
2201	First gathering point of forest biomass	3303	Briquet production of waste and residues	5302	Heat from biomethane
2301	Collector of waste and residues	3401	Biogas plant (raw biogas, fermentation)	6001	Electricity trader
3101	Processing plant for agricultural biomass	3402	Biogas plant (raw biogas, gasification)	6002	Heat trader

Fig.5: Distribution of certified scopes (2021)

In 2021, none of the certified economic operators was already obliged to prove compliance with the requirements of Directive (EU) 2018/2001 to the respective legislator in the respective member state. For example, the obligation applies to power generation plants within the scope of the German BioSt-NachV for the first time from January 1, 2022. Accordingly, the required quantities of sustainable biomass will only be required on January 1, 2022 and thus outside the reporting period of this activity report. There is also still a considerable deficit in the certification of suppliers, so that even certified biomass plants are still unable to use and report any quantities of sustainable biomass.

Against this background, 1,139,663 tons of biomass feedstock (without biomethane) were reported as sustainable feedstock in the SURE-EU system for the 2021 reporting year:



Biomass feedstock	Quantity [t]
Agricultural biomass (without agri. waste and residues)	283.169
Agricultural waste and residues	185.215
Forest biomass (without forest waste and residues)	40
Forest waste and residues	23.329
Waste and Residues (not agricultural or forest)	647.911
TOTAL	1.139.663

Fig.6: Biomass feedstock in 2021 (t)

Accordingly, the following amounts of biomass fuels were registered in the SURE-Database for the reporting period 2021, differentiated by sector:

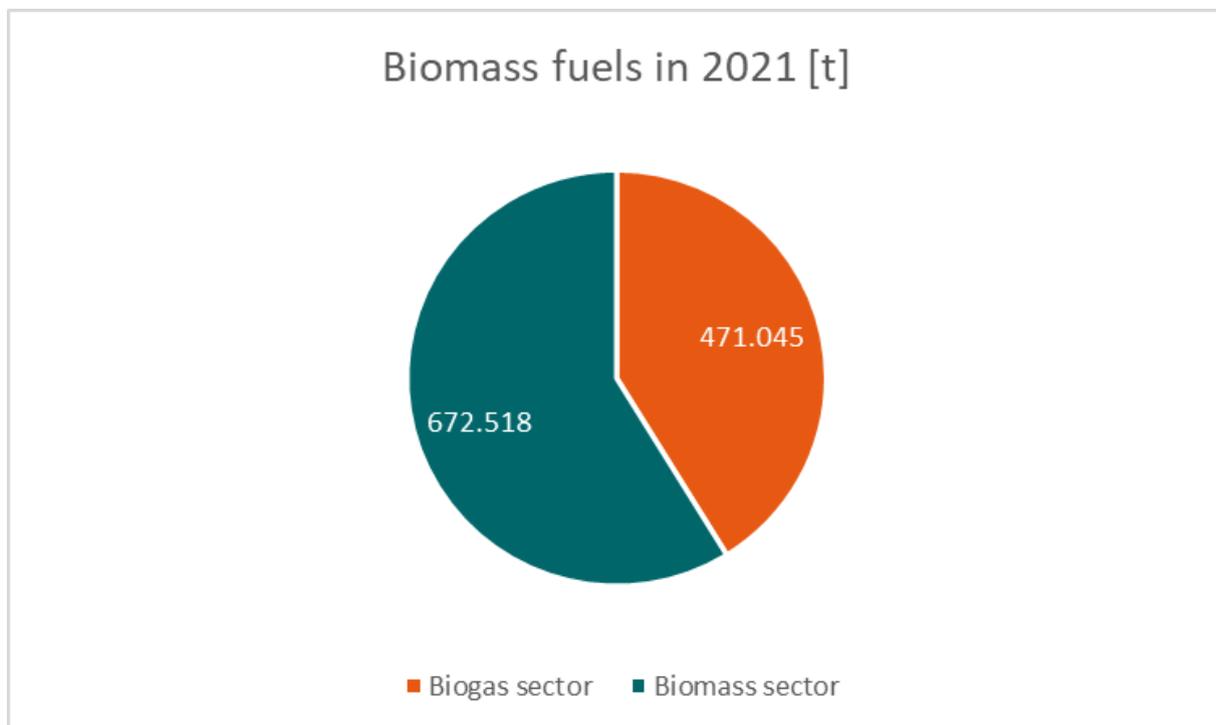
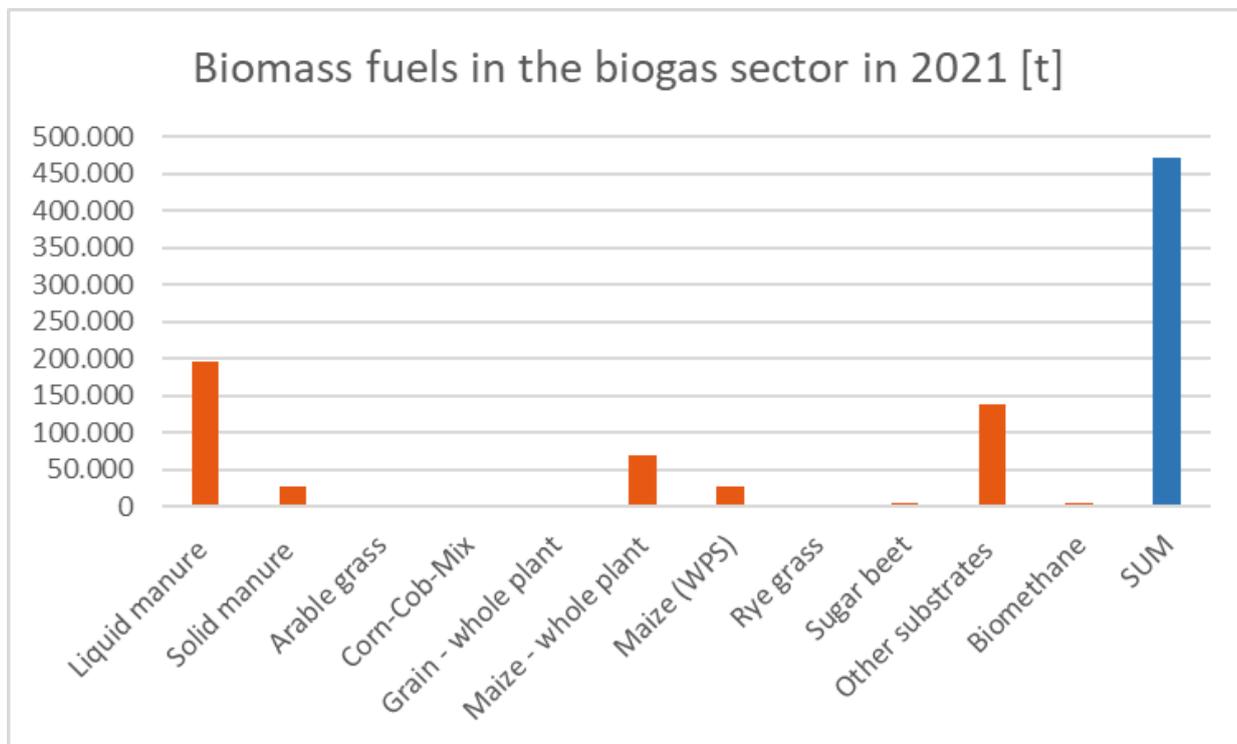


Fig.7: Biomass fuels in 2021 (t)

Of 1,143,563 tons of sustainable biomass fuels in 2021, 471,045 tons can be assigned to the biogas sector und 672,518 tons to the biomass sector.

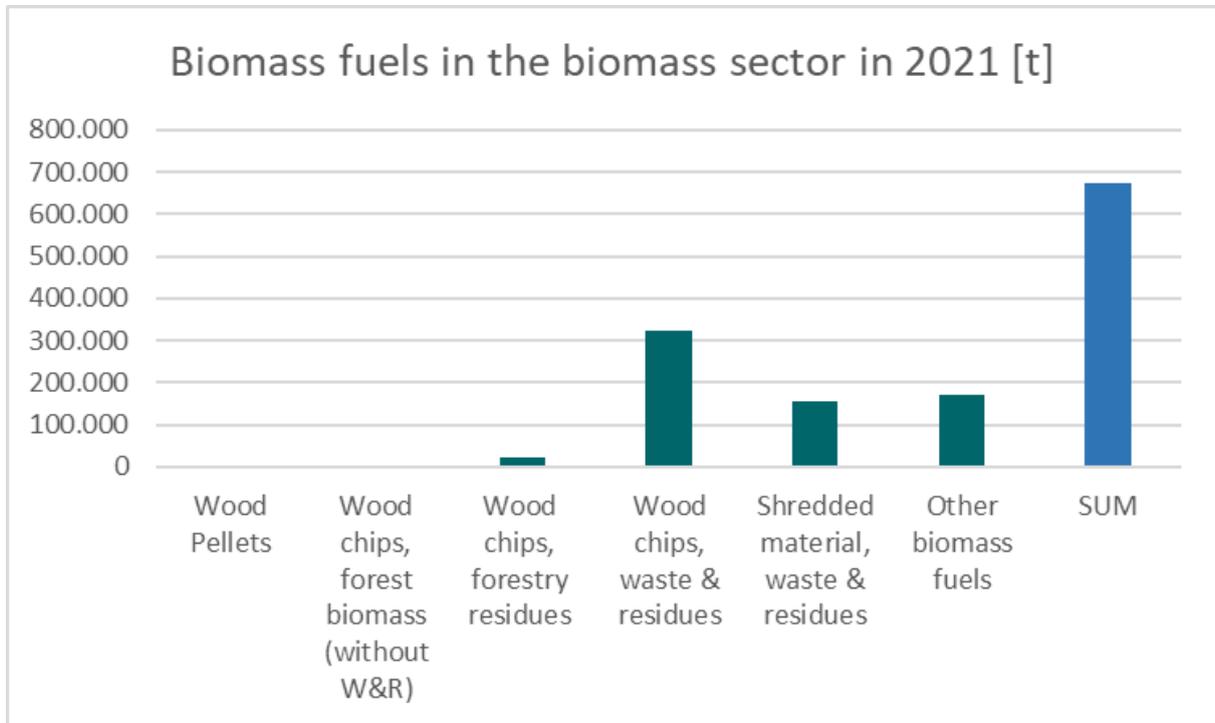
The following biomass fuels have been registered as substrate to produce biogas/biomethane or as biomethane from the use of sustainable biomass fuels in 2021:



Biomass fuel in 2021 [t]	Quantity [t]
 BIOGAS SECTOR	
Liquid manure	196.874
Solid manure	25.964
Arable grass	2.757
Corn-Cob-Mix	1.485
Grain - whole plant	648
Maize - whole plant	69.482
Maize (WPS)	27.344
Rye grass	180
Sugar beet	4.735
Other substrates	137.678
Biomethane	3.899
TOTAL	471.045

Fig.8: Biomass fuels in the biogas sector in 2021 (t)

The following quantities were registered in the SURE-EU system for 2021 for use as biomass fuel to generate electricity and heat from solid biomass:



Biomass fuel in 2021 [t]	Quantity [t]
BIOMASS SECTOR	
Wood Pellets	0
Wood chips, forest biomass (without W&R)	40
Wood chips, forestry residues	20.912
Wood chips, waste & residues	321.910
Shredded material, waste & residues	157.476
Other biomass fuels	172.180
TOTAL	672.518

Fig.9: Biomass fuels in the biogas sector in 2021 (t)

For the 1,143,563 tons of biomass fuels that were registered as sustainable biomass in the SURE-EU system in 2021, 5 countries of origin could be identified, with the bulk of the biomass coming from Poland (499,549 t) and Germany (473,324 t).

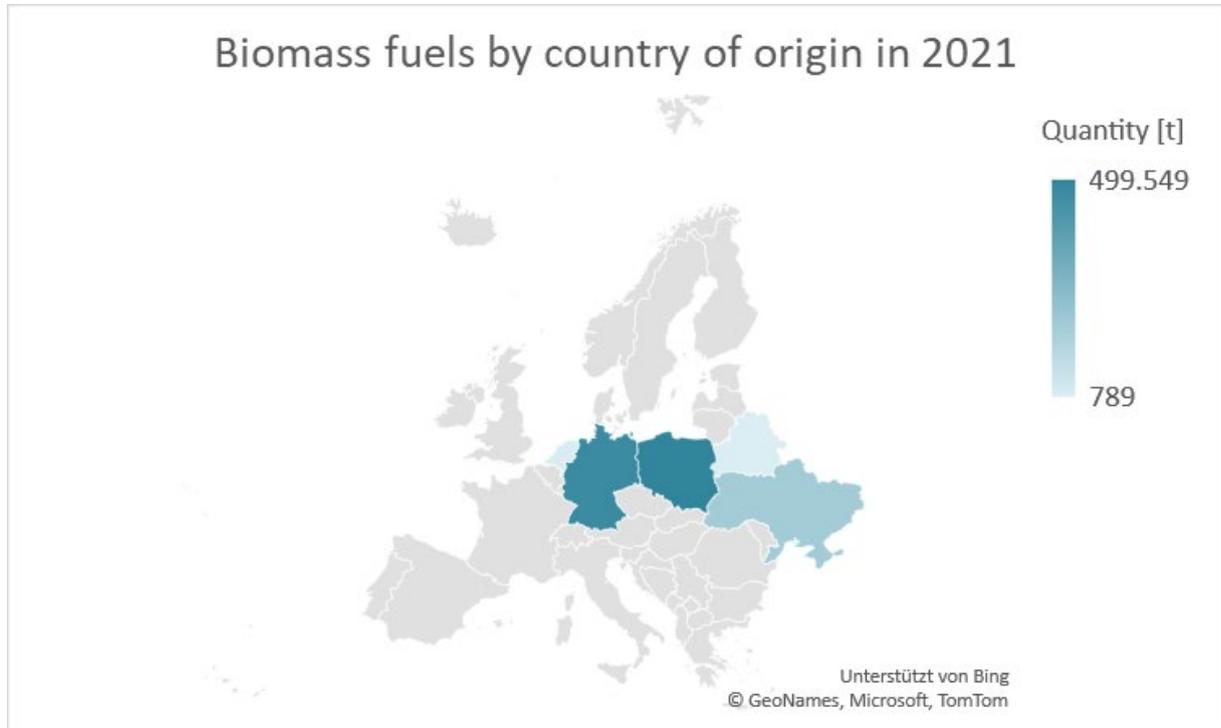
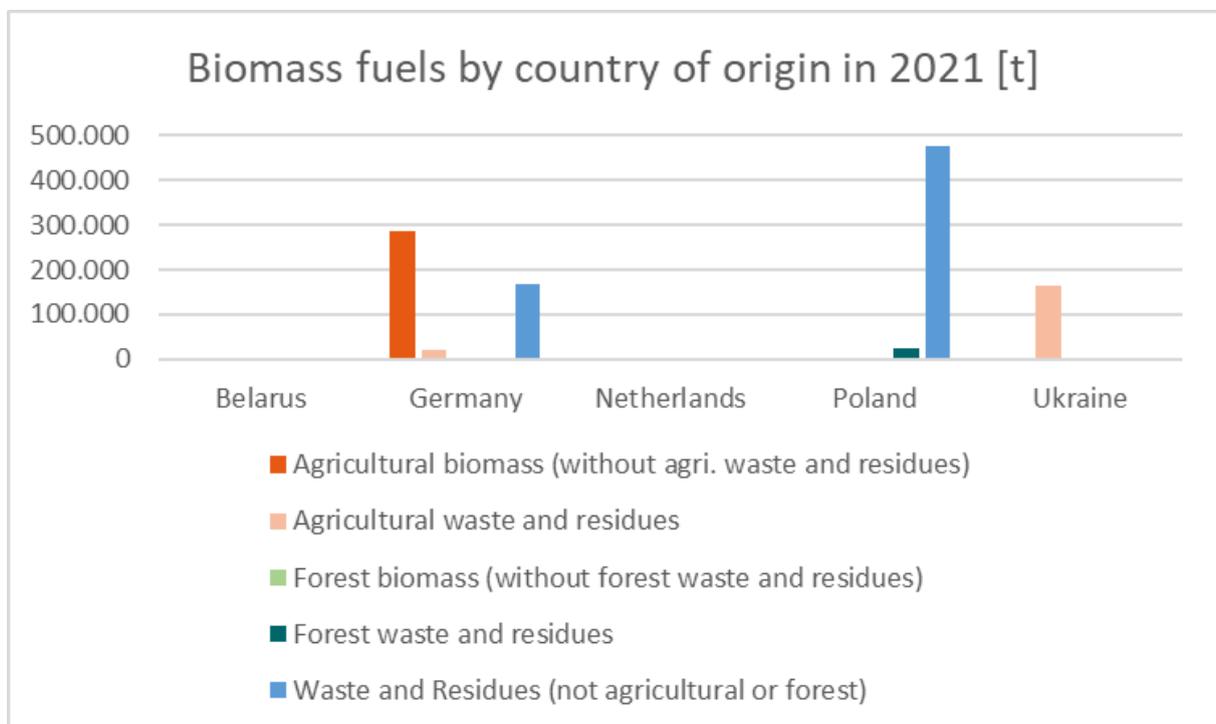


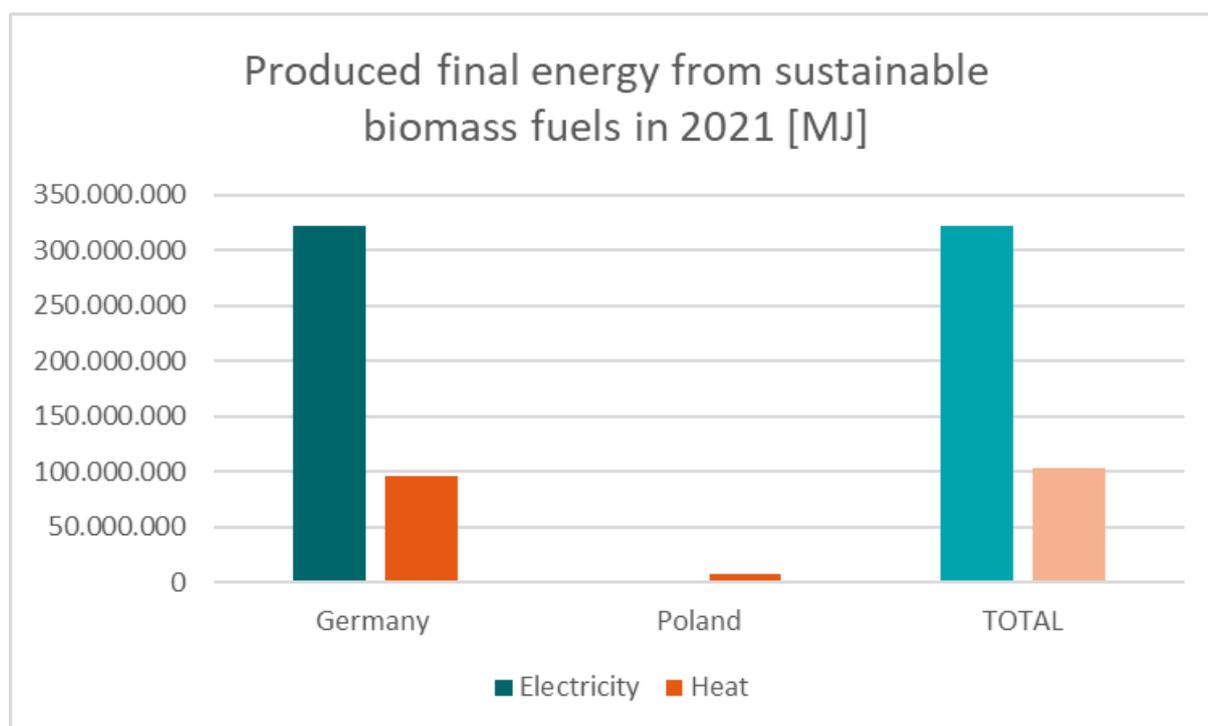
Fig.10: Biomass fuels by country of origin in 2021 (t)



	Belarus	Germany	Netherlands	Poland	Ukraine
Agricultural biomass (without agri. waste and residues)	0	287.069	0	0	0
Agricultural waste and residues	0	18.909	2.404	0	163.902
Forest biomass (without forest waste and residues)	0	0	0	40	0
Forest waste and residues	0	0	0	23.329	0
Waste and Residues (not agricultural or forest)	789	167.347	3.595	476.180	0
TOTAL	789	473.324	5.999	499.549	163.902

Fig.11: Biomass fuels by country of origin in 2021 (t)

Due to the fact that Directive (EU) 2018/2001 has not yet been implemented in numerous member states, only a few certified biomass plants generated electricity and/or heat from sustainable biomass fuels in 2021 and reported them in the SURE system:



Produced final energy from sustainable biomass fuels in 2021 [MJ]	Germany	Poland	TOTAL
Electricity	321.932.292	0	321.932.292
Heat	96.000.213	6.635.000	102.635.213

Fig.12: Produced final energy from sustainable biomass fuels in 2021 (MJ)

8 SYSTEM THAT TRACKS THE PROOFS OF CONFORMITY WITH THE SUSTAINABILITY CRITERIA

Each operator in the SURE-EU scheme is obligated to provide appropriate evidence for the sustainability claims he makes by documentation which has to be kept and archived for a minimum 5-year period.

Such documentation must provide traceability of the sustainability criteria according to the principles of mass balancing or segregation.

The documentation shall be provided in an auditable form based on a management system which defines type, content, frequency, way and duration of storage/archive.

During the audit the operator is obliged to open all files and documentation requested by the auditor which are related with the sustainability criteria under the SURE-EU scheme and must be prepared to provide further information about feedstock/biomass fuel under other certification schemes on site or accounting details on request of the auditor. On request of the auditor an operator has to provide additional information on any non-sustainable feedstock / biomass fuel, or those quantities covered by a different certification scheme when the operator has joined more than one certification scheme.

The upcoming 'Union Database' is already anchored as a mandatory system in the SURE-EU scheme for tracking all consignments of biomass fuels (if applicable) provided in the European Union for the fulfilment of the GHG saving obligations. It's expected to achieve an operational status of the database until the end of 2023. Until then, several pilot applications will check and proof the concept and usability of the database.

Anyway, 'Proofs of Sustainability' for biomass fuels (PoS) are under special scrutiny with respect to the calculation and declaration of GHG emission savings. Certification bodies are requested to assess all PoS in detail and to follow the methodology of GHG calculation for the particular pathway. Certification bodies are required to assess individual GHG calculations of an operator prior to their first implementation to assure a robust calculation methodology from the very beginning.

9 ENTITIES TO BE AUTHORISED TO RECOGNISE AND MONITOR CERTIFICATION BODIES

All certification bodies which are registered in the SURE-EU scheme (see annex table 1) must be recognised by a national public authority or hold an accreditation in line with ISO/IEC 17065 or ISO/IEC 17021. This kind of accreditation is performed by members of the International Accreditation Forum (IAF), by the bodies referred to in Article 4 of Regulation (EC) No 765/2008 or by bodies that have a bilateral agreement with the European Cooperation for Accreditation (EA).

All certification bodies resident in German territory are recognised by the German **Federal Office of Agriculture and Food** (BLE). All certification bodies resident in Poland are recognized by the **Krajowy Ośrodek Wsparcia Rolnictwa** (KOWR). In addition, as a SURE prerequisite, these certification bodies must at least hold an accreditation pursuant to the certification activity applied for.

The remaining certification body in Spain is accredited against ISO/IEC 17065 by the American accreditation body **ANSI National Accreditation Board (ANAB)**.

According to the expected 'Implementing Act' SURE has – together with REDcert – started a joined project with ANAB to establish the certification schemes as accreditable according to ISO/IEC 17065.

The option of establishing a scheme-specific accreditation seems to be the only available as nobody will take over the challenge to establish a generic RED II accreditation as it is offered by the Implementing Act. Certification bodies operating under several voluntary schemes therefore would have to seek an individual accreditation for each of the schemes.

In addition, an accreditation to ISO 14065 is required for those certification bodies assessing actual GHG calculations.

10 CRITERIA FOR THE RECOGNITION OR ACCREDITATION OF CERTIFICATION BODIES

The criteria for the recognition or accreditation of certification bodies are also published in the ' Scheme principles for the certification process .

To become a certification body within the SURE-EU scheme it is until today required to provide recognition by a national public authority or an accreditation in line with ISO/IEC 17065 or ISO 17021. This kind of accreditation has to be performed by members of the International Accreditation Forum (IAF), by the bodies referred to in Article 4 of Regulation (EC) No 765/2008 or by bodies that have a bilateral agreement with the European Cooperation for Accreditation

The certification body submits an application for registration with SURE as outlined in section 5.1.2. Registration by SURE and contract conclusion of the document mentioned above under the SURE-EU voluntary scheme. After all required documents have been submitted, SURE decides whether to approve or reject the application and informs the applicant of the decision in writing. The certification body is registered by SURE by concluding a written, legally binding contract created by SURE. The certification body is only authorised to perform audits and issue certificates under the SURE certification system once the signed contract has been received. Granting access to the scheme's database requires a valid contract.

11 RULES ON CONDUCTING THE MONITORING OF CERTIFICATION BODIES

SURE performs a systematic monitoring of its certification bodies and certification activities as a part of its Integrity Management System (IMS).

The monitoring focuses on a properly performed certification process with respect to time flow (defined time slots for reporting of audits and issuing of certificates, documentation (proper peer review and significance of findings in the audit report, potential contradictions between findings and results etc.) and duration of an audit (expended audit time with respect to an operator's scope and complexity of process).

The SURE-EU database is used to view and analyse all certifications that have been carried out. Statistics are compiled for the following criteria:

- compliance with the deadlines prescribed by the voluntary scheme for reporting and issuing certificates
- duration of "on-site" audits

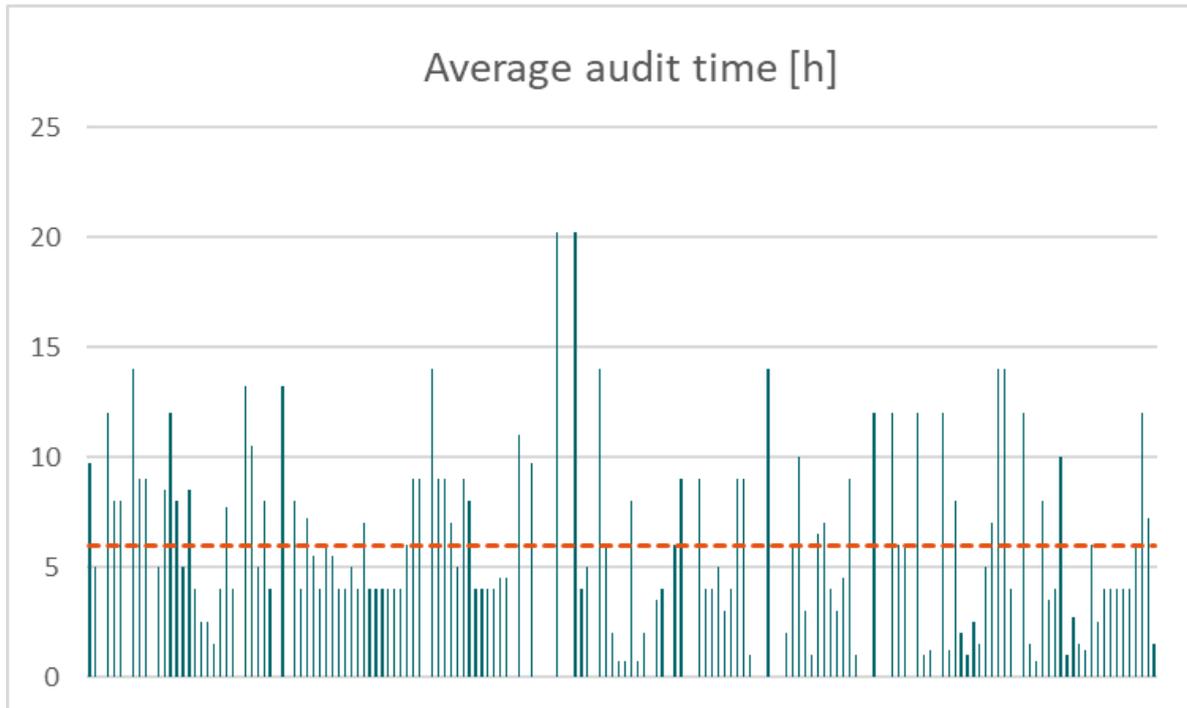


Fig 13: Average audit time without taking into account the respective scope of application

In the event of conspicuously deviating values, the certification body in question is contacted directly and asked to undertake corrective measures. If the deviations continue, SURE can exclude the respective certification body from the voluntary 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

In 2021 randomly monitored 18 audit reports. With a total number of 144 certificates, this number exceeds the internal target to monitor at least the squareroot of the stored audit reports.

Since the majority of SURE registered certification bodies already have many years of experience with other voluntary systems such as REDcert or ISCC, it is not surprising that the topics to be clarified are mainly focused on SURE specifics (such as database handling, use of correct templates).

The ratio of cases failing the established deadlines is on a very low level (2%). It can be assumed that almost every certification body has established appropriate processes to perform certification under the SURE-EU scheme.

In any case of a noticeable deviation the certification body is required to provide further explanations or corrections.

In case of repetitive problems SURE is authorized to exclude a certification body from the scheme.

In addition, the 'quality' of audits with respect to an auditor's specific skills and knowledge is assessed by SURE, too. Therefore, auditors are registered for SURE-EU scheme according to their proven

expertise, trainings and education. With respect to their proven skills and expertise one or more specific scopes are assigned to each auditor in which he's allowed to perform audits. SURE is monitoring its certification bodies, if auditors are only active within their assigned scope. If not, an audit cannot be registered in the SURE database and must be repeated.

Certification bodies are required to perform regular trainings for all auditors and staff working within the frame of the SURE-EU scheme. Therefore, each certification body has to nominate as a minimum one trainer which has been trained directly and is registered by SURE.

Beside the monitoring activities of competent authorities and accreditation bodies SURE itself is authorized to perform special audits such as office and witness audits in certification bodies headquarters or in the field (witness audit of auditors) as part of its Integrity Management System (IMS). Such special audits are performed in case of repetitive problems, complaints and any other observations which may indicate potential non-conformities affecting certification body's work.

As a consequence of all this monitoring activities a certificate can be suspended or withdrawn before its regular expiry date. Suspended certificates maybe reinstalled after the particular case (any suspect about or charge against the operator) has been cleared. In 2021 no certificates indicate a shortened validity period due to a suspension or withdrawal before their regular expiry date.

Usually a suspension or withdrawal of certificates may be due to contractual reason (e.g. unpaid system fees) or to severe non-conformities detected via monitoring and integrity management activities.

In 2021 SURE received no detailed messages about potential fraud activities.

This may be due to the relatively short period of time between the start of operations of the SURE-EU scheme on July 01st2021 and the end of the year 2021 with only 144 certificates published.



Fig. 14: Development certificates issued July-December 2021

12 POSSIBILITIES TO FACILITATE OR IMPROVE PROMOTION OF BEST PRACTICE

By involving experts from all economic groups affected, particularly practitioners from companies situated along the production chain of biomass fuels, the aim is to ensure a practice-oriented structure of the scheme. The technical committee of SURE is the platform to encourage and to promote this approach of promoting best practise. To grant a robust decision process and to avoid potential conflicts of interest the board's working procedure is defined in appropriate 'Rules of Procedure'.

The expertise as well as recommendations and tools developed for an efficient implementation of the scheme are published and shared among operators and certification bodies via

- the SURE Newsletter (regular newsletter registration open for every interested person via SURE's website)
- specific INFO e-mails for the certification body
- public announcements on SURE's website
- trainings and webinars
- presentation at seminars and conferences dealing with sustainable biofuel
- publication in branch media (national/international journal)

Certification bodies must attend minimum once per year a full day training and 'Exchange-of – Experience' (EoE) provided by SURE (see chapter 5). This EoE events focus on updates on

- legal and scheme requirements and
- the improvement and harmonisation of the certification process among the registered certification bodies.
- Common understanding and exchange of experience

Certification bodies must report to SURE about all internal trainings and topics addressed for auditors in the scope of the SURE-EU scheme.

SURE cooperates with all national competent authorities of European Member States. Typically, authorities are asking about the status of particular certified operators or specific Proofs of Sustainability (PoS) in case of uncertainty or suspect of fraud.

Consequently, SURE continues to cooperate with other voluntary schemes with respect to inter-scheme-tracking of major non-conformities and a common understanding of certain best practises to achieve mutual recognition between schemes. The implementation of the RED II has raised a couple of practical questions which have been addressed and discussed by the voluntary schemes already. In addition, the 'Implementing Act' requires an ongoing exchange of information and interpretations.

13 INFORMATION ON THE WAY THE RISK ASSESSMENT REQUIRED IN ART. 29 (6) AND (7) OF DIRECTIVE (EU) 2018/2001 IS MADE IN THE SURE-EU-SYSTEM

The risk-based approach outlined in Directive (EU) 2018/2001 (RED II) is implemented in the SURE-EU system by means of a dedicated risk assessment. Risk assessment is the systematic process of assessing potential risks that may be associated with an activity or undertaking. The risk assessment aims to minimise the probability that unsustainable forest biomass is sourced using a structured approach.

The methodology to be applied to develop this risk assessment is defined in the SURE document "Technical guidance for the assessment of the risk of unsustainable production of forest biomass" which is available for download at:

https://sure-system.org/images/Systemdokumente_EN/Technical_Guidances/TG-RA-en-12_RiskAssessment_final.pdf

The risk-based approach for forest biomass in the SURE-EU system assesses whether the required sustainability criteria are already sufficiently implemented through national or sub-national legislation in the biomass sourcing area, and whether they are being efficiently verified and, if necessary, sanctioned. If the assessment concludes that the sustainability criteria are already reflected in the relevant forest management legislation and that the laws are reliably enforced and monitored, the risk that the biomass was taken from unsustainably managed forests is considered low.

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

In the risk assessment of the SURE-EU system, the risk that the respective sustainability criteria set forth in Article 29 (6) of RED II and the SURE-EU system are not met in the area where the forest biomass is sourced is objectively assessed in a three-step process.

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

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

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

Leading questions on the three-step process:

- 1) Step 1: Identification of applicable laws
Are the requirements for sustainable forest management defined in RED II and the SURE-EU system implemented by national or sub-national legislation within the scope of the risk assessment?
- 2) Step 2: Description of legal enforcement
Have the legal provisions identified within the scope of the risk assessment been put into practice and is their implementation monitored?
- 3) Step 3: Evaluation of effectiveness in low-risk areas (optional)
Has the effectiveness of the legal framework identified in steps 1 and 2 been

documented for the individual sustainability criteria by identifying and evaluating indicators?

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

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

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

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

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

Risk assessments used in the SURE-EU system for the risk-based approach must be evaluated and recognized by SURE, or checked and verified by the auditors as part of the audit for timeliness, accuracy and completeness. Evidence of a stakeholder dialogue that has taken place is also part of this check.

A comprehensive and complete description of the procedure for preparing a risk assessment in the SURE-EU system and guidance on how to evaluate the results can be found in the "Technical Guidance for the assessment of the risk of unsustainable production of forest biomass".

https://sure-system.org/images/Systemdokumente_EN/Technical_Guidances/TG-RA-en-12_RiskAssessment_final.pdf

The description of the verification of the proof of sustainability using the risk-based approach in the SURE-EU system can be found in the scheme principles for the certification process and further explained in the technical guidance.

III Annexes

Annex I List of certification bodies registered by SURE within the SURE-EU scheme until December 31st 2021

Name certification body	Street / House number	Post Code	Place	Country	National Authority / Accreditation Body	Ident Number
AGRIZERT Zertifizierungs GmbH	Siebenmorgenweg 6-8	53229	Bonn	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-106
auditcert GmbH Umweltgutachterorganisation	Schönsteiner Str. 23	34630	Gilsberg	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-146
Bureau Veritas Polska Sp. z o.o.	Migdalowa 4	02-796	Warszawa	Poland	Krajowy Ośrodek Wsparcia Rolnictwa (KOWR)	BIO/JC/002/2014
CGN CERTIFICATION	Avda. Rodrigo de Mendoza No. 28 1 Officia B	36600	Vilagarcia de Arousa (Pon-tevedra)	Spain	ANSI National Accreditation Board (ANAB)	1216
Control Union Certifications Germany GmbH	Dorotheastrasse 30	10318	Berlin	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-105
Control Union Poland Sp. z o.o.	al. Wojska Polskiego 45	65-764	Zielona Góra	Poland	Krajowy Ośrodek Wsparcia Rolnictwa (KOWR)	BIO/JC/010/2015
ELUcert GmbH Umweltgutachter	Kastanienweg 35	48653	Coesfeld	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-136
GFA Certification GmbH	Alter Teichweg 15	22081	Hamburg	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-154
GUT Zertifizierungsgesellschaft für Managementsysteme mbH Umweltgutachter	Eichenstraße 3b	12435	Berlin	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-104
IFTA AG	Neukirchstraße 26	13089	Berlin	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-109
IFU-CERT Zertifizierungsgesellschaft für Managementsysteme mbH	Prinzenstraße 10a	30159	Hannover	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-147
Intechnica Cert GmbH	Ostendstraße 181	90482	Nürnberg	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-150
OmniCert Umweltgutachter GmbH	Kaiser-Heinrich-II.-Str. 4	93077	Bad Abbach	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-149

proTerra Umweltschutz- und Managementberatung GmbH Umweltgutachter	Am TÜV 1	66280	Sulzbach	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-123
QAL Umweltgutachter GmbH	Am Branden 6b	85256	Vierkirchen-Pasenbach	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-115
SC@PE International Ltd.	Am Schapenteich 2	38104	Braunschweig	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-138
Score GmbH Umweltgutachter	Borkener Straße 68	48653	Coesfeld	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-151
SGS Germany GmbH	Europa-Allee 12	49685	Emstek	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-100
TÜV NORD CERT GmbH	Am TÜV 1	45307	Essen	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-129
TÜV SÜD Industrie Service GmbH	Westendstraße 199	80686	München	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-102
uppenkamp und partner Umweltgutachter und Zertifizierungsgesellschaft mbH	Kapellenweg 8	48683	Ahaus	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-148
ValueCert Hub & Partner mbH Umweltgutachter, Sachverständige und Auditoren	Niedwiesenstraße 11a	60431	Frankfurt am Main	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-152
verico SCE	Hagenastraße 7	85416	Langenbach	Germany	Federal Office of Agriculture and Food (BLE)	DE-B-BLE-BM-ZSt-153

Annex II: Disaggregated volumes of biomass fuels certified under the SURE-EU system in 2021

Biomass fuel	Country of origin	Biomass feedstock	Year	Quantity [t]
Liquid manure for biomethane	Germany	Maize - whole plant	2021	34.919
Liquid manure for biomethane	Germany	Liquid manure	2021	2.979
Liquid manure for biomethane	Germany	Liquid manure	2021	11.322
Liquid manure for biomethane	Germany	Liquid manure	2021	59
Liquid manure for biomethane	Germany	Liquid manure	2021	3.000
Liquid manure for biomethane	Germany	Liquid manure	2021	3.348
Liquid manure for biomethane	Germany	Liquid manure	2021	3.492
Liquid manure for biomethane	Germany	Liquid manure	2021	5.494
Liquid manure for biomethane	Germany	Liquid manure	2021	7.197
Liquid manure for biomethane	Germany	Liquid manure	2021	16.004
Liquid manure for biomethane	Germany	Liquid manure	2021	103.241
Liquid manure for biomethane	Germany	Liquid manure	2021	4.593
Liquid manure for biomethane	Germany	Organic waste, private households	2021	1.226
Other biomass fuel	Germany	Other	2021	4.393
Other biomass fuel	Germany	Other	2021	1.482
Other biomass fuel	Netherlands	Other	2021	2.404
Other biomass fuel	Poland	Waste wood	2021	42.040
Other biomass fuel	Poland	Waste wood	2021	270.336
Other biomass fuel	Ukraine	Other	2021	163.902
Shredded material	Poland	Waste wood	2021	281
Shredded material	Poland	Waste wood	2021	157.195
Substrate for biomethane (without liquid or solid manure)	Germany	Other	2021	1.105
Substrate for biomethane (without liquid or solid manure)	Germany	Other	2021	1.571
Substrate for biomethane (without liquid or solid manure)	Germany	Liquid manure	2021	2.191
Substrate for biomethane (without liquid or solid manure)	Germany	Solid manure	2021	2.223
Substrate for biomethane (without liquid or solid manure)	Germany	Solid manure	2021	6.917

Substrate for biomethane (without liquid or solid manure)	Germany	Solid manure	2021	45
Substrate for biomethane (without liquid or solid manure)	Germany	Solid manure	2021	1.186
Substrate for biomethane (without liquid or solid manure)	Germany	Solid manure	2021	1.648
Substrate for biomethane (without liquid or solid manure)	Germany	Solid manure	2021	5.299
Substrate for biomethane (without liquid or solid manure)	Germany	Solid manure	2021	183
Substrate for biomethane (without liquid or solid manure)	Netherlands	Solid manure	2021	3.595
Substrate for biomethane (without liquid or solid manure)	Germany	Arable grass	2021	115
Substrate for biomethane (without liquid or solid manure)	Germany	Arable grass	2021	400
Substrate for biomethane (without liquid or solid manure)	Germany	Arable grass	2021	437
Substrate for biomethane (without liquid or solid manure)	Germany	Arable grass	2021	1.805
Substrate for biomethane (without liquid or solid manure)	Germany	Corn-Cob-Mix	2021	140
Substrate for biomethane (without liquid or solid manure)	Germany	Corn-Cob-Mix	2021	259
Substrate for biomethane (without liquid or solid manure)	Germany	Corn-Cob-Mix	2021	1.086
Substrate for biomethane (without liquid or solid manure)	Germany	Grain - whole plant	2021	240
Substrate for biomethane (without liquid or solid manure)	Germany	Grain - whole plant	2021	408
Substrate for biomethane (without liquid or solid manure)	Germany	Maize - whole plant	2021	3.766
Substrate for biomethane (without liquid or solid manure)	Germany	Maize - whole plant	2021	5.459
Substrate for biomethane (without liquid or solid manure)	Germany	Maize - whole plant	2021	6.467
Substrate for biomethane (without liquid or solid manure)	Germany	Maize - whole plant	2021	7.125
Substrate for biomethane (without liquid or solid manure)	Germany	Maize - whole plant	2021	7.470
Substrate for biomethane (without liquid or solid manure)	Germany	Maize - whole plant	2021	7.550
Substrate for biomethane (without liquid or solid manure)	Germany	Maize - whole plant	2021	13.515
Substrate for biomethane (without liquid or solid manure)	Germany	Maize - whole plant	2021	17.934
Substrate for biomethane (without liquid or solid manure)	Germany	Maize - whole plant	2021	197
Substrate for biomethane (without liquid or solid manure)	Germany	Maize (WPS)	2021	7.755
Substrate for biomethane (without liquid or solid manure)	Germany	Maize (WPS)	2021	9.789
Substrate for biomethane (without liquid or solid manure)	Germany	Maize (WPS)	2021	9.800
Substrate for biomethane (without liquid or solid manure)	Germany	Other	2021	8.154
Substrate for biomethane (without liquid or solid manure)	Germany	Other	2021	20.535

Substrate for biomethane (without liquid or solid manure)	Germany	Other	2021	28.797
Substrate for biomethane (without liquid or solid manure)	Germany	Other	2021	36.849
Substrate for biomethane (without liquid or solid manure)	Germany	Other	2021	40.086
Substrate for biomethane (without liquid or solid manure)	Germany	OTHER AGRICULTURAL BIOMASS	2021	2.807
Substrate for biomethane (without liquid or solid manure)	Germany	Rye grass	2021	180
Substrate for biomethane (without liquid or solid manure)	Germany	Sugar beet	2021	662
Substrate for biomethane (without liquid or solid manure)	Germany	Sugar beet	2021	1.573
Substrate for biomethane (without liquid or solid manure)	Germany	Sugar beet	2021	2.500
Substrate for biomethane (without liquid or solid manure)	Germany	W&R from the production and processing of agri. biomass	2021	450
Wood chips	Belarus	Waste wood	2021	789
Wood chips	Poland	Roundwood (forest plantation)	2021	40
Wood chips	Poland	Other	2021	20.335
Wood chips	Poland	Residues and wood from thinning (natural forest managm.)	2021	577
Wood chips	Poland	Waste wood	2021	2.417
Wood chips	Poland	W&R from the treatment of waste	2021	472
Wood chips	Poland	W&R from woodworking and processing	2021	3.703
Wood chips	Poland	Waste wood	2021	0
Wood chips	Poland	Waste wood	2021	287
Wood chips	Poland	Waste wood	2021	361
Wood chips	Poland	Waste wood	2021	1.505