

# REPORT

to the European Commission  
according to:

EU Renewable Energy Directive 2018/2001  
Implementing Regulation (EU) 2022/996

## 2024

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) 2022/609 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, 2025

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## I Introduction

Voluntary certification schemes have been established for the purpose of providing evidence of compliance with the sustainability requirements laid down in Directive (EU) 2018/2001. The European Commission has, in accordance with Article 30 (5) of Directive (EU) 2018/2001, mandated these voluntary schemes to report about their certification activity on an annual basis. This document constitutes the SURE-EU System Activity Report for 2024, developed with the aim of complying with the annual reporting obligations, as defined by the European Commission. Voluntary certification schemes' reporting obligations and criteria were updated with the publication of the Implementing Regulation (EU) 2022/996 on June 14<sup>th</sup>, 2022.

The annual activity report developed by recognized voluntary certification schemes is made public with the aim of increasing transparency and improving oversight by the European Commission. Furthermore, this annual activity report provides the necessary information to the European Commission about voluntary scheme's operational activity, with a view to identify and promote best practices in the sector.

Voluntary schemes are required to include the following minimum information in their annual activity reports:

1. ***A list of the certification bodies*** approved for conducting third-party audits to evaluate economic operators' compliance with the scheme's requirements. The information provided shall also indicate, for each certification body, by which entity or national public authority the certification body was recognized and is monitored.
2. ***Rules on the independence, methodology and frequency of audits*** as approved by the European Commission (EC), as well as any revisions to such rules made over time to: incorporate any guidance received from the EC, align with the revised regulatory framework, address any findings resulting from internal monitoring and the evaluation of certification bodies' auditing process, as well as to adapt to the ever-evolving industry's best practices.
3. ***Rules and procedures for identifying and dealing with non-compliances*** by economic operators and members of the scheme.
4. ***Evidence demonstrating compliance with the legal requirements on transparency*** and publication of information in line with Article 6 of Implementing Regulation (EU) 2022/996
5. ***Stakeholder engagement***, in particular, information about the consultation processes managed by the scheme and the engagement with indigenous and local communities and other interested and/or affected stakeholders, prior to decision-making during the drafting and review of the scheme's normative framework requirements, as well as during the audit process.
6. ***Overview of the activities carried out by the voluntary scheme in cooperation with the certification bodies*** with the objective of improving the quality and robustness of the overall certification process, as well as to ensure the skills and impartiality of auditors and certification bodies.

7. **Market updates of the scheme** in addition to data on the volumes of certified feedstock, biofuels, bioliquids, biomass fuels, recycled carbon fuels and renewable fuels of non-biological origin, as well as data on the feedstock's country of origin and type. Lastly, information on the total number of certified operators under the scheme should also be provided.
8. **An overview of the effectiveness of the system implemented by the scheme's governance body to monitor proof of conformity with the sustainability criteria.** Information shall also be provided detailing how the system implemented effectively prevents fraudulent activities by ensuring a timely identification and mitigation of risks, as well as the implementation of effective follow-up measures and actions to address, correct and prevent any further fraudulent activities and/or other irregularities identified in the implementation of the requirements of the normative framework.
9. **Recognition criteria for certification bodies**
10. **Rules and procedures on internal auditing and monitoring systems**, including details on how internal monitoring is conducted, as well as how results of internal monitoring activities are addressed within the system. Information is also provided about the scheme's oversight monitoring and evaluation efforts of certification bodies' performance. A description is also provided of the system for managing complaints raised against economic operators and certification bodies.
11. **Activities implemented aiming at facilitating and promoting best practices** within the industry.
12. **Methodology for the development of Risk Assessments** by voluntary schemes, in line with Article 29(6) and (7) of Directive (EU) 2018/2001.

SURE-yearly report provides a thorough and detailed overview of the activities implemented by SURE-EU system – related to the third-party certification of economic operators for the compliance with the EU Renewable Energy Directive 2018/2001 (RED II) and the related Implementing Regulations - for the time period of January to December 2023, including information about points 1-12 above listed.

## II Annual Report Fundamental Information

### 1 List of certification bodies recognised

Registered certification bodies (CB) in SURE-EU system are publicly available on the [SURE website](#) and is regularly updated to adapt the changes on the status and the number of CBs. For the purpose of this report, the number of CBs partnered with SURE scheme as of Dec 31<sup>st</sup>, 2024, are attached to the Annex I.

### 2 Independence, type and frequency of audits

The requirements in SURE-EU certification scheme defined for certification bodies (CBs) and auditors, as well as the regulations governing the overall certification process are set out in the normative document '[SURE Scheme Principles for the Certification Process – Requirements and Specifications](#)'. This document provides a comprehensive overview of the protocol that CBs are required to adhere to during the certification process. It also specifies all the requisite requirements that must be met to guarantee the impartiality, consistency and integrity of the certification process, as well as the objectivity and plausibility of the auditing results.

#### a) Independence and Impartiality

CBs recognized for SURE-EU system must conduct their audits/inspections in accordance with the requirements stipulated in the norm DIN EN ISO 19011. To ensure compliance with this norm, CBs must also achieve accreditation.

CB compliance evaluations of economic operators and auditing decisions shall not be influenced by personal relationships, financial incentives or other factors. CBs and their corresponding auditors must remain independent of the economic operators (and their respective suppliers) subject to the certification process and therefore be free of any conflicts of interest.

#### b) Technical and staff requirements for CBs

The normative document '[SURE Scheme Principles for the Certification Process – Requirements and Specifications](#)' outlines the necessary tools, procedures and systems for the certification process, ensuring compliance with the system requirements stipulated in Directive (EU) 2018/2001 (RED II). Section 6 of the document provides further details on the relevant CB personnel's skills and qualifications. SURE requires documented evidence to be presented as proof of compliance with the requirements listed in sections 5 and 6 of the document.

### **c) Principle of peer review**

To maintain the integrity and impartiality of peer review processes (emphasizing the separation of the evaluation and certification), CBs must involve at least two qualified individuals in the processes. At least one of these individuals must be a registered auditor within the SURE-EU scheme, with efficient proof of holding the necessary qualifications to undertake the audit. This ensures that the final certification decision is not made by the same individual who conducted the audit, as to ensure the impartiality of the audit result.

### **d) Handling complaints and claims**

CBs must have an effective process in place for managing complaints and grievances (implemented in the form of procedures, policies and systems). The complaints management system and related processes and procedures form part of the CB's Quality Management System. The CBs expected to provide a timely and effective resolution of complaints, in the event these were raised (as well as the implementation of corrective action measures to address any identified non-compliances or issues, if deemed necessary).

Additionally, SURE-EU system incorporates a public Complaint Management System, which outlines the procedure followed in the SURE-EU system when complaints and issues are raised at the SURE Secretariat level. The SURE Complaints Management System describes the process followed for processing complaints related to the performance of: SURE Secretariat, CBs and economic operators certified under the SURE-EU scheme. The normative document describing the SURE Complaints Management is the SURE [‘Scheme principles for integrity management’](#).

According to the principles and processes outlined in the SURE [‘Scheme principles for integrity management’](#) any stakeholder grievance (in the form of an appeal or complaint) related to a CB's auditing decision, its performance during the certification process and/or any other potential issue that could put into question the impartiality and quality of the auditing process and outcomes (such as potential misbehaviour and fraud), shall prompt immediate action by the SURE Secretariat, where the potential issues raised shall be investigated in a timely manner and corrective actions shall be taken if/when necessary.

### **e) Audit intervals**

The CB must conduct a full audit at least once a year (with a maximum time interval between audits of 12 months) to verify that the economic operator's operations fulfil the applicable certification requirements.

The SURE-EU certificate issued following a successful audit has a validity of max. 12 months. Ideally the re-certification audit is to be carried out before the existing valid certificate expires so that the certification can be maintained by issuing a new certificate without a gap. Copies of the audit report and certificate are submitted to SURE and stored in the SURE database no later than 60 calendar days from the first day after the audit process

In the framework of its Integrity Management System, the SURE Secretariat is authorized to require, on an extraordinary basis and when substantiated concerns exist, for 'special audits' to be conducted with the objective of ensuring the integrity and quality of the overall certification system. The special audits shall be carried out by either the CB responsible for the certification process of the particular economic operator in question or by a third party impartial competent body or individual appointed by SURE Secretariat to evaluate potential non-conformities arising from stakeholder grievances.

### **3 Methods for identifying and dealing with non-compliances**

Appropriate audit criterion has been defined for the 'neutral audits' conducted within the framework of implementation of the SURE-EU scheme to ensure the objectivity of the certification process are attained.

These **audit criteria** are organized and transformed into **four types of auditing checklists**:

- ✓ Checklist for Agricultural biomass producers
- ✓ Checklist for Forest biomass producers
- ✓ Checklist for Waste and Residues producers
- ✓ Checklist for Interfaces that use biomass fuels

Auditors undertaking audits under the SURE-EU certification framework must use SURE checklists without compromises. Following the conclusion of the auditing process, CBs are required to submit a completed audit checklist to the SURE Secretariat in the form of an audit report. This report must contain all the relevant information and data regarding the economic operator subjected to the audit. This includes data about the economic operator gathered prior to, during and as a result of the certification exercise. The CBs must upload the completed check list (audit report) to SURE system database before the corresponding certificate can be published (see section 4 below for more information about this internal process).

**Auditing findings are classified** in the SURE-EU certification system as follows based on the EU Renewable Energy Directive 2018/2001 (RED II) and the complementary Implementing Regulation (EU) 2022/996:

- ✓ **'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.')

Based on the auditor's finding for each criterion, the audit result is calculated automatically.

**Audit results are classified into three levels:**

- Level 1** ➔ Fully compliant
- Level 2** ➔ Partially compliant (minor deviations detected to be solved within the certification period)
- Level 3** ➔ Non-compliant (due to critical criteria (K.O.) or a certain level/volume of minor/major deviations)

Auditors are responsible for defining and monitoring the implementation of corrective actions for all non-compliances identified. All the defined corrective actions result from the auditing process which shall be implemented at the operational level by the economic operator. In order to address the non-compliance/s identified) they must be documented in the corresponding audit checklist. In the event that the audit finds the economic operator as 'non-compliant' with the SURE-EU certification system, this would trigger the initiation of a sanction procedure under the SURE-EU scheme, as stipulated in the normative document *SURE* [‘Scheme principles for integrity management’](#).

**a) Change of scheme by economic operators**

“Scheme Hopping” is one of the existing practical challenges faced by certification schemes. This situation may exist where economic operators which may not have transparency at their core of their sustainability business model might decide to switch from one CB or certification scheme to another frequently. It may create a loophole as an intentional strategy for the Scheme users to leave non-conformities unaddressed, and therefore creating a situation that could jeopardize the integrity, certification process and quality of the SURE-EU system

In order to mitigate and address any potential integrity issues that could arise from this or other high-risk situations, SURE system has implemented a robust application process to be followed by new applicant scheme participants who wish to initiate the certification process with SURE scheme. The vigorous application process has proven to inhibit these types of risks and safeguards the credibility of the SURE-EU system.

As a first ***step in their application process*** to become system participants of SURE-EU scheme, applicant ***economic operators must disclose*** information about:

- ✓ ***Existing*** valid SURE certificates,
- ✓ ***Withdrawn or suspended certificates*** (which were withdrawn or suspended before the standard expiry date); and

- ✓ *Certificates issued by other schemes* recognized by the EU Commission for demonstrating compliance with RED II. This includes the disclosure of certificates which validity ended according to the standard validity period and not due to unaddressed non-conformities.

In addition to disclosing the above information, economic operator applicant must avail its performance history by granting access to SURE scheme to all its relevant information concerning any previous identified non-compliances. This includes those non-compliances raised in the certification process under the framework of other recognized voluntary schemes.

Furthermore, the disclosure of the above-mentioned data is needed, not only for the legal entity applying for the SURE-EU scheme but must also be provided for any other precursor legal entities, as to prevent fraudulent practices that could jeopardize the credibility of the SURE system. An example of the illicit activities include change of the name of the legal entity as a means to avoid addressing and correcting any potential non-conformities identified in the auditing process.

The process followed for the screening of applicant economic operators to SURE-EU system is shown in the below diagram.

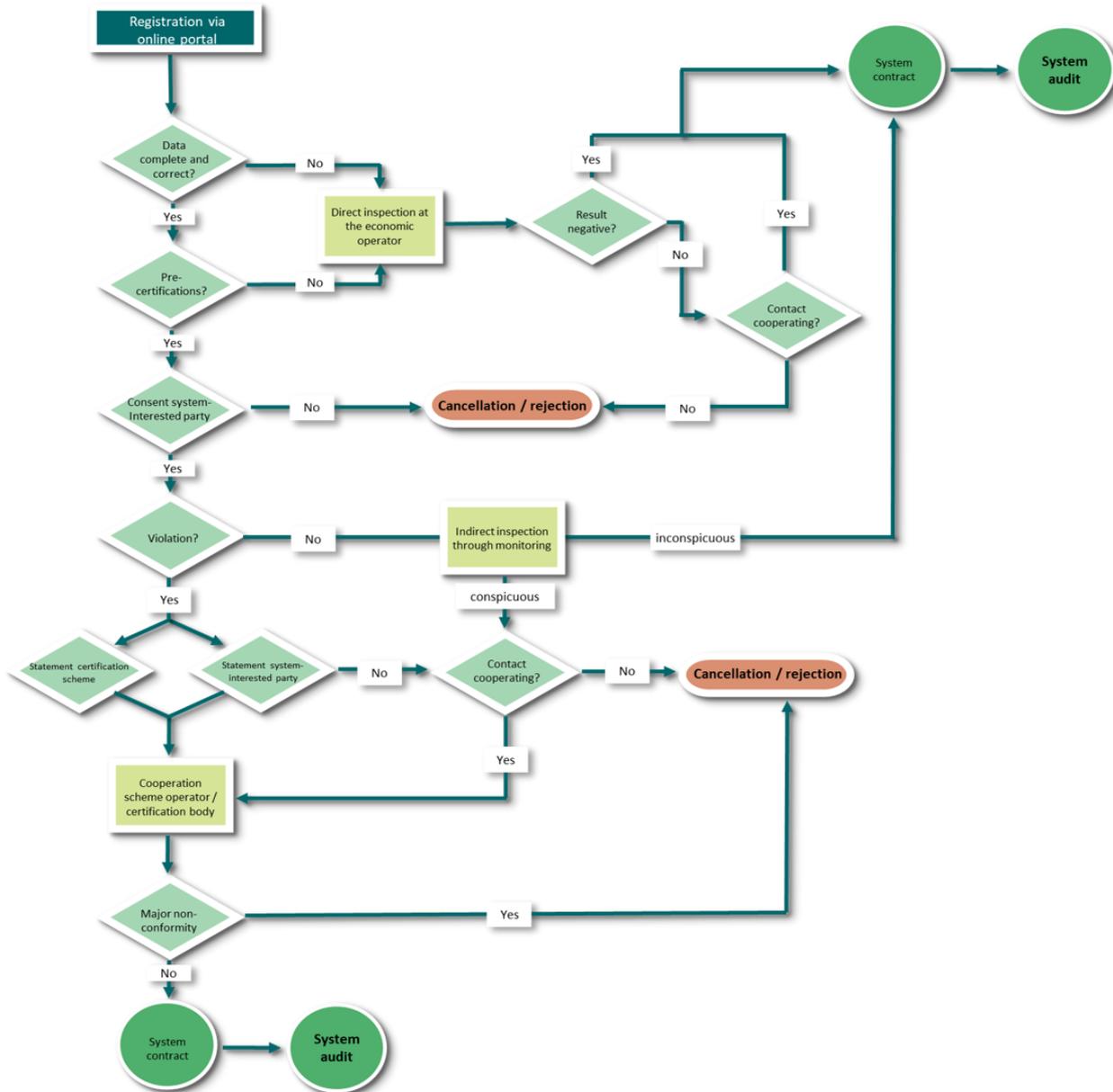


Figure 1: SURE registration process for new applicant economic operators

Ultimately, a new certificate under the SURE EU scheme can only be issued if all non-compliances identified by the previous recognized voluntary schemes have been corrected. That is, adequate implementation of the corrective action measures shall be evaluated with special scrutiny by the responsible CB. Any detected false statement or misleading information by an applicant economic operator about its certification history shall be considered as sufficient basis to justify the decision of the SURE scheme to cancel the agreement with the economic operator and to proceed to withdraw the certificate with immediate effect.

## 4 Transparency and accessibility of the sure-EU scheme

SURE-EU scheme has defined a set of transparency measures to meet the legal requirements defined by legislators under the EU-regulation framework, the related Implementing Regulation and to conform with SURE system's integrity and credibility principles and standards. These measures are described in detail in the normative document '[SURE Scheme principles for integrity management](#)' and handle a set of key themes.

### a) Transparency and public access to scheme documentation

Transparency and engagement are key principles for the development of the scheme and its relationship with potential stakeholders. The SURE-EU scheme therefore publicly updates and uploads all Scheme documents relating to ongoing projects, amendments to the Scheme Rules at [www.sure-system.org](http://www.sure-system.org). Through this process, all SURE stakeholders, authorities and interested parties to have quick and free access to all relevant information as well as the latest news concerning resource sustainability. Additionally, SURE provides tools and information materials to scheme participants and to the approved CBs, through the SURE database, direct communication or provision of the flyers and the booklets. Additionally, interested stakeholders can also sign up to the SURE newsletter, which is free of cost, and through which SURE scheme provides regular updates of the development of the SURE-EU system. Other platforms such as webinars, conferences and events, the publication or articles, among many others have facilitated the process.

SURE-EU Scheme acknowledges the use of social media and incorporation of data driven decision to evaluate and extend its reach to the public and involved parties. Stakeholders can access [SURE LinkedIn page](#), where news and developments of the system are regularly published for all interested stakeholders. In addition, SURE will roll out a dashboard tool in 2025 that will facilitate real time casting of the crucial information relevant to the stakeholders and the authorities.

The transparency and Stakeholder engagement are elemental in the overall SURE certification system, both for information sharing and incorporating stakeholder feedback in the process of development of SURE's normative framework. As part of the transparency process, SURE facilitates engagement with the CBs to share information with interested stakeholders involved in the biomass and bioenergy sector. In line with the RED II requirements, SURE's risk assessments are presented, which involve risk evaluation of unsustainable production of forest biomass.

Forest biomass risk assessment forms the basis of Risk Based Approach in SURE certification system and was developed following stakeholder consultations. As part of the internal review and approval process of Risk Assessments, SURE Secretariat conducts a thorough review of the stakeholder engagement efforts invested in the development of the Risk Assessment as to ensure that:

- ✓ **The stakeholder consultation is transparent** by making information on the draft Risk Assessment easily accessible for interested stakeholders and share documentation in a culturally appropriate format and language);
- ✓ **The stakeholder consultation is balanced** by providing opportunity for all diverse stakeholders

with diverse backgrounds to provide feedback into the process. The diversity in fields such as environmental and social non-for-profit organizations, industry representatives, biomass or industry associations, governmental authorities, etc are crucial for making a strong and balanced decision.

- ✓ *The stakeholders' feedback is analysed and documented* in consideration to the objectives and due consideration.

The summary of the stakeholder's engagement process is processed and provided for the transparency purposes in the last section of all the approved SURE Risk Assessments.

SURE shares information free of charge about the implementation of the certification process to interested stakeholders, through numerous platforms, such as: webinars, conferences and events, the publication of articles and social media updates, a regular newsletter, among many other.

More information about stakeholder engagement, as well as the role that SURE National Supporting Bodies have in this topic is provided in the below sections of this document.

#### **b) Transparency in scheme membership**

SURE system establishes bilateral legally binding agreements with economic operators, as well as with active CBs in the scheme to transparently stipulate the rights and the obligations of the respective parties as enshrined in the SURE-EU system's transparency principles

Based on these legal agreements, the requirements of the certification scheme must:

- ✓ be binding in their application,
- ✓ be verified through a transparent process; and
- ✓ when necessary, be enforced through legal means.

The legal agreements between SURE and registered CBs ensure that EU Member States and competent authorities, as stated under Article 30 (9) of the RED II Directive, can monitor and evaluate CB's operations. Upon a request from a Member State or due to its own proactive initiative, the EU may require SURE to evaluate whether the SURE-EU scheme operates according to the rules and requirements defined in RED II Directive and its related Implementing Regulation. The process involves the access to the necessary data that would enable this evaluation, which include audit reports and actual GHG calculations by economic operators and/or certification bodies) as assured by the contractual provisions stipulated in the previously mentioned bilateral legal agreements. The contracts are carefully structured standard documents and individual agreements relating to the scheme requirements are not made.

### c) Transparency in scheme management

SURE runs a secured internal database that document and store all certification data including the SURE certified economic operators. The overview of the information shelved in the database include.

- ✓ **Name and background data** for all scheme participants (economic operators) which include all dependent operating sites and contact persons. These information speeds the process of traceability and precision when tracking participant operations.
- ✓ **Audit information** for all the audit processes undertaken for the scheme participant and the relevant audit findings and corresponding reports. Audit being a crucial part of the Integrity Management, the data is analysed to monitor each CB and its Auditors performance.
- ✓ **Certificate information** for all certified scheme participants SURE-EU scheme. SURE-EU Scheme make good use of the information to track the trend in certification, predict the scheme development and also act as reference in addressing issues related to certification.
- ✓ **All sanction measures** raised, and the scheme participants involved.
- ✓ **Market data** relevant for the scheme's reporting obligations to the European Commission which include the biomass quantity used in energy production in different market sectors.

While information stored are crucial, the decision on leasing or data provision rest upon SURE's top Secretariat management and ensure that the data protection and privacy standards are upheld.

Annually, SURE-EU system fulfils the requirements with the need to provide specific data and its reporting obligations, as stipulated in Directive (EU) 2018/2001 Article 30 (5). The data is presented based on the format outlined by the EU data reporting template (the Activity Report) which is made available to any interested stakeholder on the [EU Commission's website](#). The required information is submitted to the responsible offices of the European Commission within the specified period (by the 30<sup>th</sup> of April of the year after the reporting year) availed by this document.

### d) Transparency in scheme certification

A scheme participant is considered to conform with the SURE- EU system by attaining a valid certificate. The validity of the certificate is an essential prerequisite for any economic operator to be able to trade with certified sustainable biomass or biomass fuels in line with the requirements and criteria as defined in RED II Directive. The information pertaining to certificate validity is therefore availed public for transparency in the [public certificate database](#) accessible in [SURE website](#). The information concerning the certificates include all certificates issued in the SURE-EU scheme to economic operators including all valid, expired, suspended and withdrawn certificates. This public certificate database available online provides a detailed overview of certificates issued under the SURE-EU framework, as well as information about their validity and scope of application. CBs responsible for issuing and monitoring SURE certificates must ensure that the certificate data is publicly available and fully updated.

SURE certificates are listed in the [public certificate database, providing access to the following data:](#)

- ✓ Certificate status (valid, suspended, expired/withdrawn)
- ✓ Certificate identifier
- ✓ Name and contact details of the economic operator
- ✓ Certificate validity period
- ✓ Scope of certification (type of operations)
- ✓ List of biomass handled by the certified site
- ✓ Name and contact details of the responsible CB
- ✓ Copy of the issued sustainability certificate

The screenshot shows a web interface for searching certificates. At the top left is the SURE logo. Below it is a banner image of a field at sunset. The main heading is "CERTIFICATES AND INSPECTION CERTIFICATES" with a search icon on the right. Below the heading is a text block: "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." Below this is a search form with the following fields: Identifier, Company name, Country (with a dropdown arrow), Status (with a dropdown arrow), Valid from (with a calendar icon), Valid to (with a calendar icon), Scope, Biomass, and Certification body. Below the form is a note: "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." At the bottom is a table header with columns: Status, Identifier, Company name, country, Valid from, Valid to, Scope, Biomass, and Certification body.

Figure 2: A section of the public database for Certificates and inspection certificates detailed to key aspects such as country and biomass.

## 5 Stakeholder involvement

### a) Shareholders Assembly

The SURE-EU scheme is supported by a number of sectoral organisations ([shareholders](#)), largely representing economic operators in the agricultural and forestry sectors and producers of heat and electricity from biomass fuels.

The operations of the SURE scheme are independently managed and not influenced in whatsoever by the stakeholders. Important decisions concerning the operations of the system are taken by majority of the shareholders' meeting. All decisions taken shall be documented in an appropriate form.

### b) Technical Committee

SURE-EU Scheme grounded a [Technical Committee](#) to make use of the specific industry and stakeholder expertise. A committee that also facilitate exchange of feedback from the interested and the affected economic operators. The committee's expertise is essential to the development of the SURE-EU scheme, and its role is to advise the executive management and initiate and promote the process of continuous improvement and development of the SURE-EU scheme. All scheme normative documents must be endorsed by the Board prior to submission to the European Commission for recognition.

The process for involvement and engagement of shareholders and stakeholders is defined in the SURE internal procedure 'Rules on procedure'. This document is based on the principles of impartiality and transparency of stakeholder engagement and decision-making processes (among other elements), as to prevent any potential conflict of interest.

Representatives of CBs, national authorities, industry representatives and associations, research institutes, social and environmental NGOs and any other stakeholders interested in the SURE-EU certification system are invited to cooperate with SURE at this technical level, by joining the above-mentioned technical committee.

### c) National Supporting Bodies (NSB)

SURE has also established formal partnerships with national biomass associations and institutions across the globe, under the SURE umbrella called [National Supporting Bodies \(NSBs\)](#). The NSBs role is:

- ✓ to promote the global development of SURE system,
- ✓ to ensure the engagement of stakeholders at a national level,
- ✓ as well as providing expertise in the national and regional legislation and context.

SURE-EU scheme is in partnerships with eight biomass associations, representing SURE and its mandates across nine countries around the globe. These countries include Germany, Spain, Austria, Lithuania, Latvia, Czech Republic, Slovakia, Greece and Namibia. A full overview of the national biomass associations in detail can be accessed through SURE website [here](#).

The collaboration creates a platform promoting the exchange of experiences with economic operators in the EU Member States involved in the bioenergy sector, at a national level. It also promotes the exchange of experiences in the implementation of RED II and SURE requirements among different countries, promoting continuous learning and the strengthening of the overall certification scheme.

SURE hosts on an annual in-person meeting of SURE NSBs bringing together all biomass associations who have the role of SURE National Supporting Bodies. The annual meeting aim to further promote the exchange of experiences between NSBs and ensure alignment in representing and facilitating the implementation of SURE certification in each of their countries.

With the purpose of information sharing and awareness raising about sustainable biomass as a renewable energy source, as well as to promote the SURE scheme as an available tool for economic operators to demonstrate compliance with the requirements under RED II and the relevant Implementing Regulation, NSBs organize a variety of trainings, workshops, meetings, conferences, events and webinars, as well as publish written communications.

NSBs have the responsibility of translating the essential SURE Scheme requirements to their national language and context. They also raise any outstanding observed issues in the implementation of SURE certification in their countries and provide recommendations to SURE Secretariat on how to best adjust and strengthen the system, if and when needed.

In 2024, SURE conducted over 10 NSB online and in persons meetings, trainings and workshops. These events included trainings on quantity reporting system, exchange of experience, training on the UDB among other events. NSB workshops were conducted in Poland, Spain, Greece and Austria which facilitated stakeholder engagement in their countries and raising awareness about sustainable biomass and SURE certification.

#### **d) Exchange of Experience with Certification Bodies (CB) in implementing SURE certification**

SURE Secretariat organizes calibration meetings with CBs regularly (at least once a year) to harmonize and align the performance of CBs operating in the framework of the SURE-EU system. These CB calibration meetings promote the alignment and consistency in the implementation of SURE certification globally and provide a space for CBs to raise any issues or questions about implementing SURE certification requirements on the ground. These CB calibration meetings contribute to a harmonized approach to implementing SURE requirements across all CBs. Participation in these calibration meetings is mandatory for the appointed CB representatives.

SURE organized four exchange of experience meetings with CBs in 2024, of which two were conducted in English. In addition, SURE also conducted two train-the-trainer courses which supports the transfer of the SURE-EU regulations to the participating institutions

## e) General dialogue

As sustainability in energy production is a concern, SURE Scheme proactively promotes the global relevancies of the biomass and bioenergy sector. This includes the importance of sustainable biomass as a key renewable energy source that will enable the EU to meet the ambitious targets defined under the Fit for 55 package.

To promote and inform about sustainable biomass certification, SURE took part in numerous conferences, seminars and other events related to the biomass industry organized by associations, environmental organizations and competent bodies of the EU member countries. The participation in these events is part of SURE scheme's stakeholder engagement strategy, as these conferences and workshops provide a space for engaging with various stakeholders and players in the biomass industry and exchange perspectives about the implementation of sustainability certification under the RED II framework, as well as about the overall development of the bioenergy sector.

SURE contributes to these events through proactive engagement by hosting informational sessions and participating in expert panels and roundtables, ultimately to inform and exchange ideas with stakeholders with regards to the implementation of SURE certification, the different processes and legislative status at the EU Member States, as well as about potential areas for system development for the scheme.

In 2024, SURE took part in 10 in person international conferences and seminars to present the requirements and status of implementation of the SURE certification for demonstrating RED II compliance.

## 6 Overall robustness of the scheme

SURE scheme engages with different scheme participants around the globe, providing the most reliable, robust certification system which aligns with the EU legal framework or regulations. SURE certification process upholds the dignity of EU laws on sustainable use of biomass fuels in heat and electricity production. It ensures that the expectations and the needs of the economic operators along the value chain are met within the regulation framework.

By keeping the mandates, mission and the goals of the EU regulations alongside good governance and stakeholder relations, SURE scheme was re-recognised by the European Commission, early 2024. SURE scheme follows Active scheme management principle to increase efficiency in management and keep the integrity of scheme management, which includes:

- ✓ Consistent *scheme documentation*
- ✓ Following the *EU Certificate Accreditation principles* in the certification process
- ✓ *Transparent scheme management*, regular reports and publications
- ✓ *Public certificate database*
- ✓ *Complaint Management System*

- ✓ *Integrity Management System* and
- ✓ *Sanction System* for handling major non-conformities

Besides the SURE databases and public tools (as described in previous sections of this report), SURE certification has implemented **additional systems and measures to ensure the consistency and integrity of its certification scheme**, including:

- ✓ *Services and support tools* for economic operators and certification bodies under the SURE-EU scheme; and
- ✓ *Risk and crisis management systems* to address and processes any potential grievances that may arise related to SURE-EU system

SURE’s activities and services include training for economic operators and CBs (E.g. the ‘Train-the-Trainers’ training for CBs). Furthermore, SURE Secretariat staff is available to resolve individual support enquiries from economic operators and CBs raised via multiple communication channels.

## 7 Market updates of the scheme

### a) Scheme development

SURE-EU certification system has globally developed and continue to expand its certification territory. The scheme covers all types of biomass feedstock (forest biomass, agricultural biomass and waste and residues) within the scope of European Commission recognition. The coverage provide efficiency in reflecting the heterogeneity and diversity of supply chain market within the bioenergy sector and provide tools and system, to the economic operators in the field of electricity and heat generation from biomass fuels, that can be utilized to demonstrate compliance with the EU Renewable Energy Directive 2018/2001 (RED II).

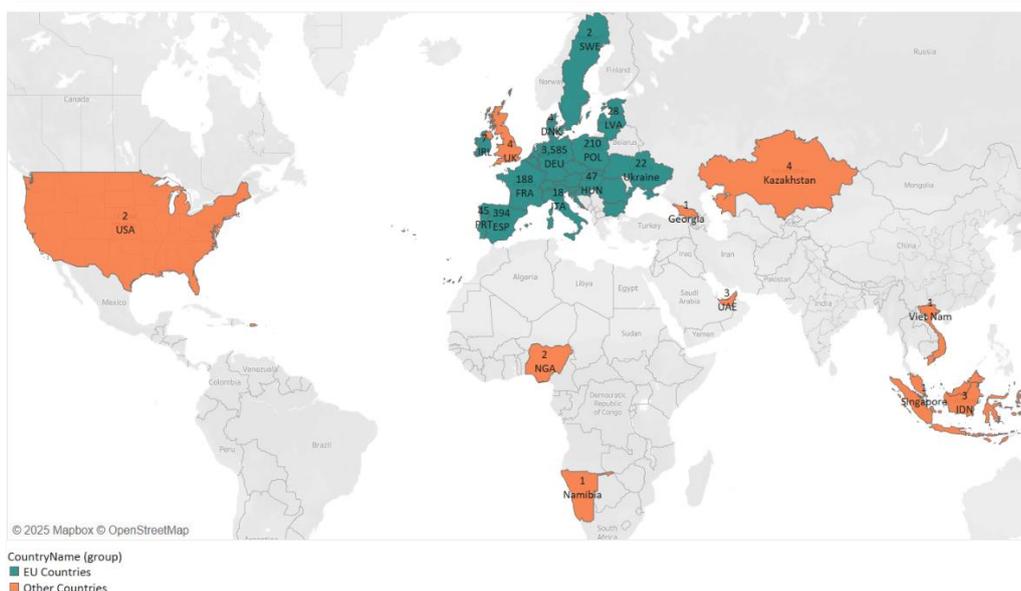


Figure 3: Global distribution of SURE-EU Scheme participants with contracts (2024).

SURE scheme continues to expand its certification globally in enhancing sustainable use of the biomass materials for heat and electricity generation. In contrast to the [2023, Activity report](#), the number of scheme users increased in various countries with emergence of new countries joining SURE scheme in 2024. Within the European countries, SURE records over 800 new schemes operators with high gains in Germany, France, Spain and Austria. Overall, the largest number of scheme users are still distributed with the EU countries by December 2024 (*Fig.3*).

Distribution of certificates relates to the number of valid contracts, however, there is a gap between certificates and the number of valid contracts. The number of valid contracts has always surpassed the number of valid certificates (*Fig.4*). The gap persists exist due to:

- ✓ Delayed audit process by the CBs which may take up to 6 months after the validation of the contract, resulting to a backlog of certification processes.
- ✓ Voluntary delay of the process by the scheme operator after contract validation.

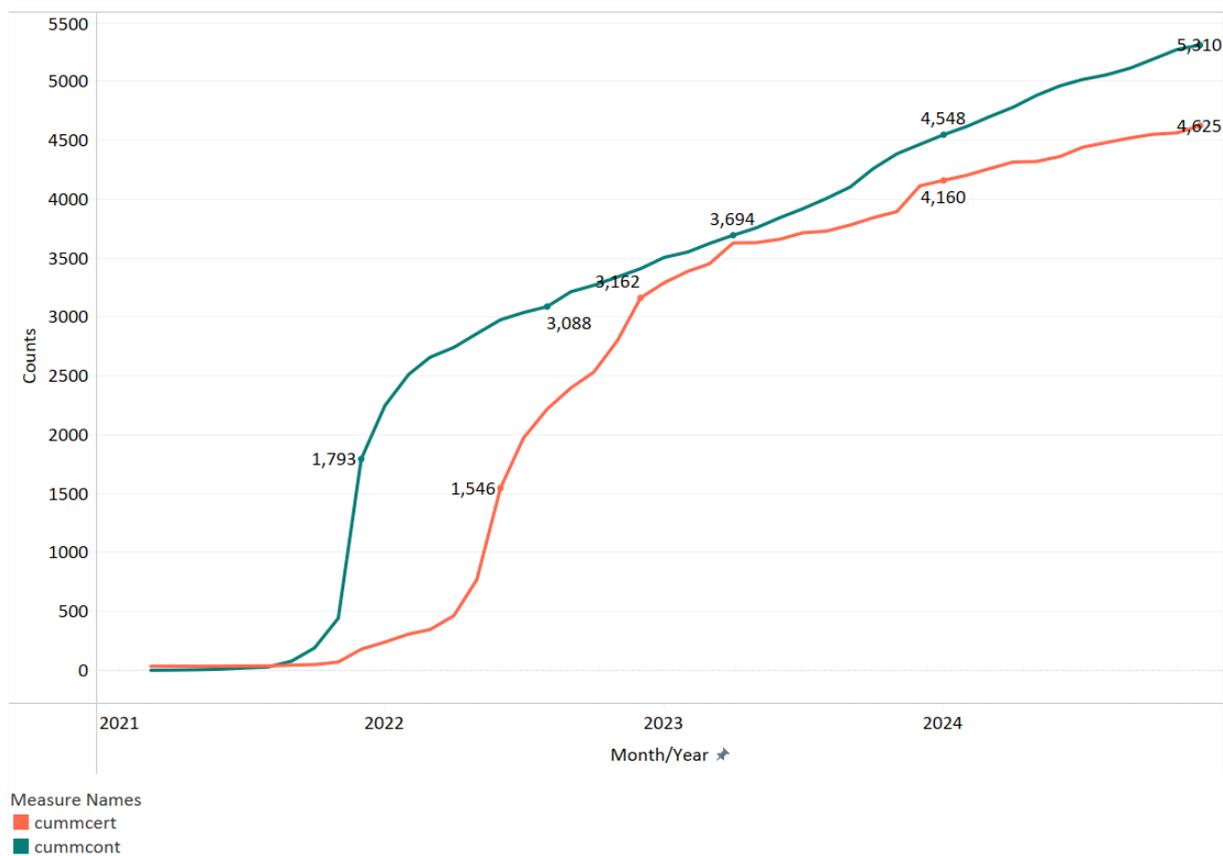


Figure 4: Cumulative time series trend in number of valid contracts and certificates illustrating the gap between total contracts and certificates.

Following the mandate of the EU Renewable Energy Directive 2018/2001, SURE only verifies the supply chain of biomass fuels for heat(or cooling) and/or electricity generation. To verify the production of heat (or cooling) and/or electricity from sustainable biomass feedstock, SURE requires the certification

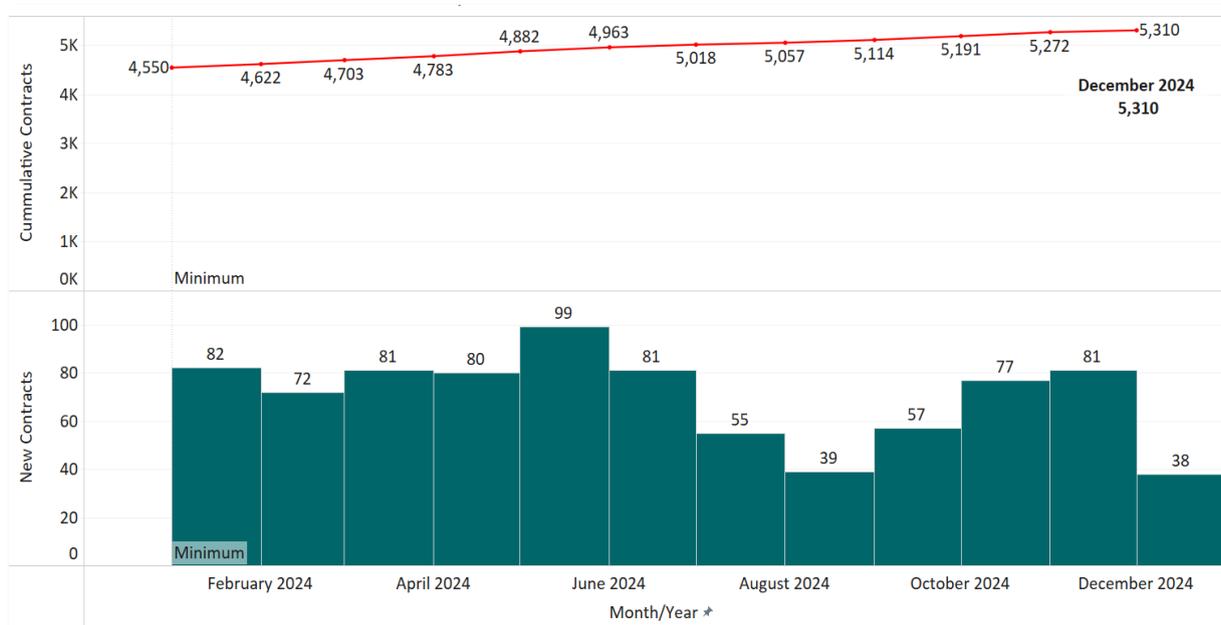
of all economic operators in the downstream supply chain according to the principles of an EU-recognized voluntary or national scheme.

This presents downstream interfaces with the challenge of only being able to register biomass as sustainable if their suppliers are already certified and were able to deliver biomass as sustainable fuel. SURE scheme provides systems, processes and tools for downstream interfaces to overcome these challenges ensuring they meet the traceability and transparency requirements across supply chains as stipulated in RED II EU Directive.

**b) SURE-EU System scheme users and scheme development trends**

The year growth in SURE-EU certification scheme at the end of December 2024 was profound. The SURE-EU system has shown a continuous growth on number of certificates as well as valid contracts. *Figure 5* illustrates the SURE scheme users monthly development and the overall cumulative growth. Despite the changes in contract status for some scheme users as shown in the **integrity section**, there is increase in the number of scheme users with a total of 5,310 by the end of December 2024. SURE Scheme shows proof of efficiency and trust in certification to the public, resulting to over 849 increase in number of new scheme users in 2024.

In 2024, SURE evaluated the seasonal distribution of the new contracts (*Fig.5*):



*Figure 5: Development of SURE Scheme Users with valid certificates in 2024.*

The experience with the implementation of the SURE-EU certification scheme has shown that the demand for third party certification by economic operators (to demonstrate their compliance with the

RED II sustainability requirements) is directly linked to the transposition of the RED II requirements into the national legal framework by each of the EU Member State.

In early 2024, most EU Member States had transposed RED II into their national and regional legislation, which triggered a significant demand in SURE-EU certification from economic operators across the EU in the early quarters of the year 2024.

**c) Global distribution and development of SURE certification system**

Once SURE-EU scheme users are issued a certificate from the certification body (following a successful auditing process after contract validation), these economic operators become SURE certificate holders. The total number of certificates in a reporting year is the summation of the Yearly-recertification and the new certificates recorded in that year.

Figure 6 shows the number of certificates issued per month in the SURE-EU system from the 1<sup>st</sup> January 2024 to 31<sup>st</sup> December 2024. In 2024, issued certificates followed relatively a similar trend as of the contract. Majority of the certificates were offered between May and July and another peak in November and December which reflects the statutory deadlines for providing the RED II proof of sustainability in the member states at the middle or end of the year. An overall of 4,625 scheme participants with valid certificates can be registered for 2024:

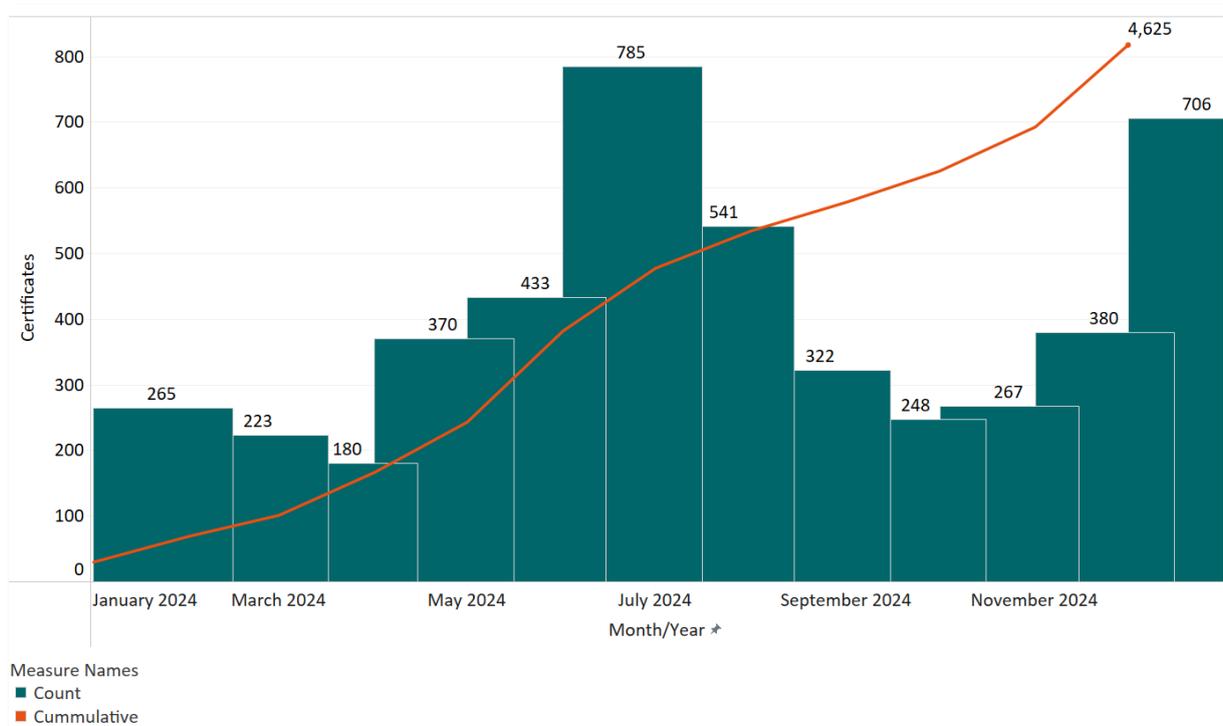


Figure 6: SURE certificates (monthly and total accumulative) issued in 2024.

Most of the SURE Scheme certificates are within the EU member states and neighbouring third countries. The greatest number of certificates issued in 2024 was recorded in Germany, Austria, Spain, Poland and then France. However, considering yearly certificate growth there is higher increase in certificates in the eastern Europe compared to the central EU regions. In contrast to 2023, the number of certificates nearly doubled in Austria and France in 2024 (*Table 1*). This is due to the implementation of the national and regional legislation act by scheme participants, alongside the changes made in the woody biomass.

*Table 1: Comparison of the certificates issued in the year 2023 and 2024 for the top 15 countries with largest number of certificates.*

Year	Austria	Croatia	Czech Rep.	France	Germany	Hungary	Latvia	Lithuania	Poland	Portugal	Romania	Slovakia	Slovenia	Spain	Ukraine
<b>2024</b>	<b>336</b>	27	60	<b>119</b>	3293	26	20	26	162	35	24	50	55	321	10
<b>2023</b>	<b>172</b>	10	52	<b>25</b>	3180	29	22	24	166	23	1	30	36	298	11

In 2024, SURE recorded total registered scheme participants with valid contracts (5,310) and certificates (4,625). This was an increase compared to the reporting year 2023 (*Table 2*).

*Table 2: SURE Scheme Participants with valid contracts and issued certificates in the SURE System in 2024 compared to 2023.*

	<b>2024</b>	<b>2023</b>
Participants with valid contracts	5310	4633
Participants with valid certificates	4625	4307

SURE System certifies products along the value chain which consist different scheme users along the value chain which is segregated into scopes (*Fig.7*). The biomass feedstock from producers are forwarded to other scopes in the value chain such as biomass processing plants which convert the materials into products such as wood pellets or other biomass fuel. The verification along the scope-type in the supply chain plays a key role in ensuring traceability and inclusivity of distinct market operators, at any scope, willing to comply with the EU regulations. *Figure 7* shows increase in number of certified scheme users in almost all the scopes.

Trade and logistics, ‘first gathering points’ and/or ‘collection points’, followed by biomass processors showed higher growth in terms of increased number of economic operators having SURE certificates.



Figure 7: SURE certificates per supply chain phase (certification scope) in 2024.

Electricity and heat generating plants, using biogas and biomethane, dominate the SURE System over the reporting years. The number of scheme users in these scopes continue to increase in significant numbers in every reporting year. At the end of the reporting year 2024, the total number of contracted producers of heat and/or electricity were 415 using solid biomass and 2,523 for biogas and biomethane sector. Amongst these scheme users 345 in solid biomass and 2,386 in biogas sector were respectively certified.

The German market is characterized by a huge number of farmers who produce their own feedstocks for biogas production and convert it into electricity on site. Their number exceeds that of the solid biomass plants significantly which explains the dominating role of the German market compared with other member states (Fig.8).

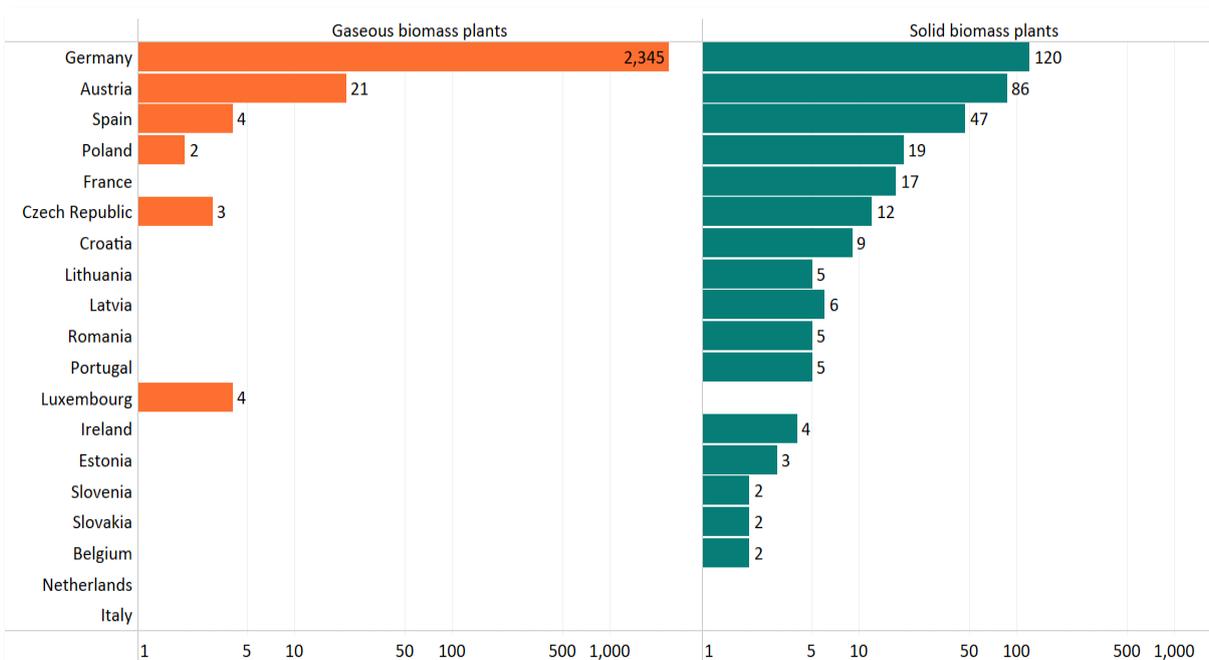


Figure 8: Certified scheme users producing electricity and heat (solid biomass vs. gaseous biomass) in 2024.

#### d) Biomass quantity in 2024

For 2024, a total of **68.74 million tons** of produced sustainable biomass feedstock were reported for energy production under the SURE system. This account for **23%** increase in biomass feedstock quantity reported compared to the year 2023.

Out of the total volumes of sustainable biomass sourced/collected by scheme participants from biomass producers, feedstocks from waste and residues account for the largest proportion (33.4M tonnes), seconded by agricultural biomass. Sustainable forest biomass certified under the SURE certification system corresponded with the smallest share (8.9M tonnes) of the total volumes of SURE certified biomass in that year. The proportion of the total volumes of sustainable biomass under the SURE scheme for 2024 per feedstock category is represented in *Figure 9*. Compared to the year 2023, forest waste biomass has increased compared to agricultural or waste and residue feedstock.

Biomass from agriculture sector is covered largely by maize or corn (over 17.9M tonnes), which includes silage and corn meal. Waste and residues are largely biomass from liquid manure or sewage sludge (9.5M tonnes) while forest biomass constitute of waste and residues from forest management and forest biomass, *Table 3*.



*Figure 9: SURE certified sustainable feedstock quantities (per biomass type) collected in 2024.*

The sustainable feedstock quantities reported were sourced from different countries, mainly within the EU region. This included Germany which recorded the highest numbers of tonnes for agricultural (24.9M) and waste & residues biomass (22.1M) respectively. The largest quantity of forest biomass originates from Austria with over 2.4M tonnes while contributing to 3.4M tonnes of waste & residue.

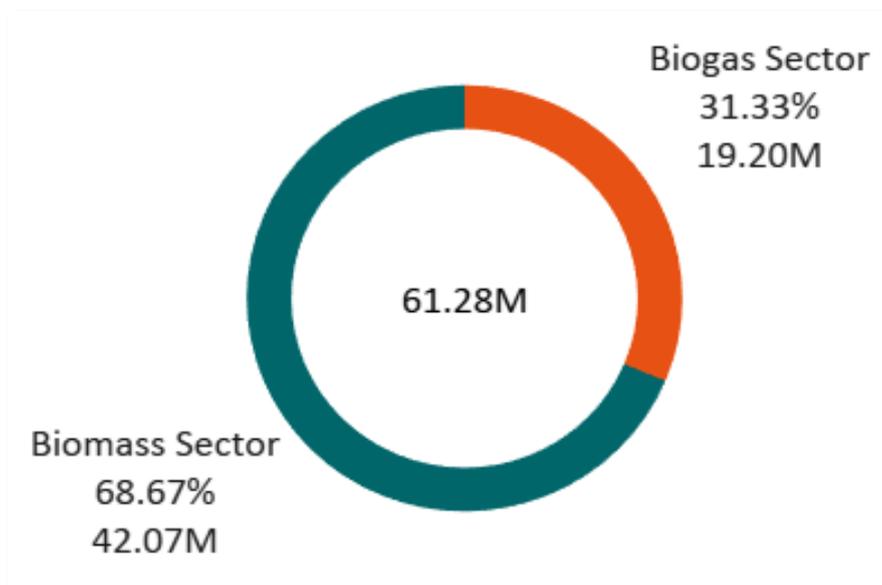
*Table 3: Reported quantities (in tons) of feedstock gathered in 2024 under SURE scheme.*

Feedstock	2024
<b>Waste and Residues</b>	<b>33.40M</b>
-of animal wastes	12.96M
- of Biowastes (ie food)	1.78M

- of other wastes (i.e. Wood)	18.66M
<b>Agricultural</b>	<b>26.52M</b>
- of non-cereals	5.89M
- of all types of cereals	18.27M
- Agricultural wastes	2.36M
<b>Forest biomass</b>	<b>8.82M</b>
-Forest material	4.67M
-of forest waste (Maintenance and management)	4.15M
<b>Total</b>	<b>68.74M</b>

More of the information on the biomass feedstock and their country of origin is found in [Annex II](#).

Sustainable solid biomass fuels accounted to 69% of the reported volumes while 31% were for biogas production (*Fig 10*). Most of the sustainable solid biomass fuels for the year 2024 were from wastes and residues which made up to approximately 25.1M tonnes of biomass fuels, while close to 15.3M and 1.6M tonnes are from forest and agriculture feedstock respectively. For the biogas sector which includes biomethane, sustainable biomass feedstock used were from agriculture and as waste & residue accounting for 11.9M and 7.3M tonnes of biofuels respectively.



*Figure 10: Quantity of biomass biofuel generated in 2024*

In the biogas sector, biofuel produced, used or transferred to other scheme users along the value chain does not only mean final consumable products (biomethane) but includes also other treated materials such as substrate for biomethane or manure. These products are transferred to other scheme users that generates biomethane (biogas respectively) (*Fig 11*).

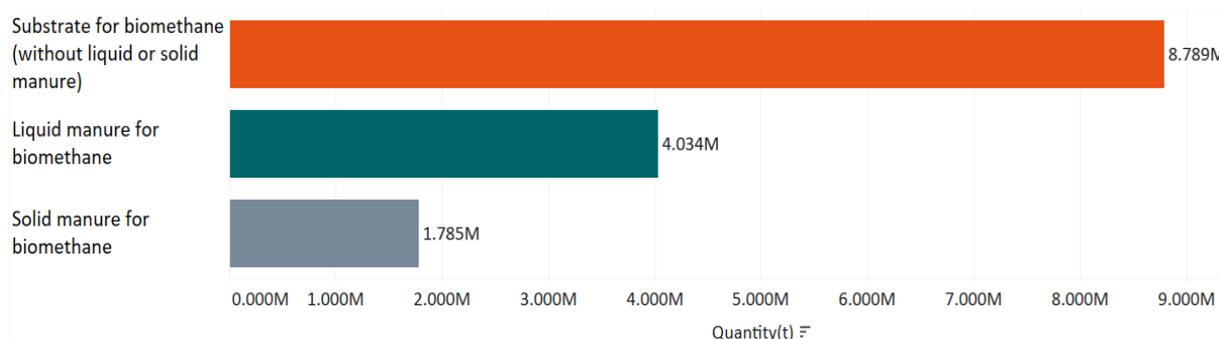


Figure 11: Feedstock transferred to other scheme users of biomethane production

On biomethane products, close to 2.6M tonnes of biomethane was generated from maize and its related products, liquid manure constituted to 0.27M tonnes while other feedstocks contributed to a value less than 0.2M tonnes of produced biomethane.

Table 4: reported quantities (in tons) of biofuel produced in 2024 under the SURE scheme

Biofuel Product	2024
Wood chips	19.64M
Other biomass fuels	18.32M
Shredded materials	3.43M
Wood briquettes	0.0033M
Wood pellets	0.49M
Other pellets	0.19M
Biomethane	4.35M
Other gaseous fuels of biogenic origin	0.24M
<b>Total</b>	<b>46.67M</b>

The biofuel quantity under the SURE scheme is dominated by wood chips and other biomass fuels while wood briquettes constitute of the lowest amount.

## 8 System that tracks the proof of conformity with the sustainability criteria

Each operator in the SURE-EU scheme is obligated to provide appropriate evidence for its sustainability claims by recording the corresponding documentation (whereby documented evidence must be kept and archived for a minimum 5-year period). The recorded documentation must provide traceability of the RED II sustainability criteria, according to the principles of mass balancing or segregation.

Once a party has expressed interest in pursuing SURE certification, the prescribed legal process must be followed which includes document verifications. CBs must have a documentation management

system that control documents and records, manage the internal audits and outline procedures for identifying non-conformities.

To ensure the integrity in the sustainability bioenergy market, operators within the SURE-EU scheme are obligated to substantiate their sustainability assertions through meticulous records documentation. The accuracy of the data stored in these records is validated by designated auditors. During the auditing process, economic operators must furnish the pertinent documentation in an appropriate (auditable) format based on a management system. This management system, implemented by economic operators, must delineate the type of documentation and the information to be recorded. The records used to substantiate sustainability claims (certificates) must be retained for a minimum of five years. The documentation must include traceability of the RED II sustainability criteria, according to the principles of mass balancing or segregation.

Scheme users are obligated to provide all the relevant information, documents and files required by SURE-EU scheme during the audit process. Should the auditor request, further follow-up information regarding the feedstock/biomass fuel certified for RED II compliance by other recognised certification schemes, and/or additional information on other non-certified feedstock/biomass fuel, should be provided.

In the SURE-EU certification framework, 'Proofs of Sustainability' for biomass fuels are subject to scrutiny with regard to the calculation and declaration of greenhouse gas (GHG) emission savings. CBs responsible for the certification process are therefore requested to review 'proofs of sustainability' in detail and to verify that these are in line with the methodology for GHG calculation provided in RED II. As part of the audit process, CBs must assess individual GHG calculations conducted by economic operators to ensure robust, consistent and transparent calculation in line with the method defined in RED II.

The Union database has enabled the traceability of renewable fuels since November 21, 2024. Nevertheless, some challenges still need to be overcome. A future delegated regulation supplementing Directive (EU) 2018/2001 will extend the scope of other end-use sectors that are obliged to use the UDB as well as the data to be included in the Union database. The aim of the Union Database is to trace data from the origin of the raw material to the production of the fuel in order to overcome the risk of double counting. SURE continues to ensure that the valid certificates for the economic operators within the SURE-EU system, which are obliged to use the Union Database, are up to date. Moreover, SURE supports our economic operator with the onboarding process.

## **9 Entities authorised to recognise and supervise certification bodies**

All CBs registered in the SURE-EU scheme (Annex I) must be recognised by a national public authority or hold an accreditation in line with ISO/IEC 17065. CBs performing audits on behalf of SURE-EU scheme must be accredited according to ISO 17065 and ISO 14065 (if performing audits on actual GHG values).

In addition, all CBs applying for operation under SURE-EU system must be:

- ✓ Accredited by a national accreditation body and in accordance with Regulation (EC) N° 765/2008, or for the scope of Directive (EU) 2018/2001, or the specific scope of SURE scheme; and be
- ✓ Recognised and supervised by a competent authority for the scope of Directive (EU) 2018/2001, or the specific scope of SURE certification.

EU Implementing Regulation [2022/996](#) Article 11 (1) stipulates the needs for accreditation for CBs conducting audits under the framework of Directive RED II.

Publication of the Implementing Regulation in the European Journal on March 08<sup>th</sup>, 2024 postponed the obligation for accreditation to January 01<sup>st</sup>, 2025. By this deadline, a new version of Article 11(1) of Implementing Regulation (EU) 2022/996 was announced with regard to the requirements for accreditation.

## **10 Criteria for the recognition or accreditation of certification bodies**

The criteria for the recognition or accreditation of approved CBs for auditing in SURE-EU scheme are detailed in the SURE normative document '[Scheme principles for the certification process](#)' (page 39).

It is mandatory for all CBs to prove fulfilment of the above-mentioned requirements to be approved by SURE. Applicant CBs who wish to expand the scope of their certification services to include the SURE-EU system shall submit an application to SURE Secretariat. Once the application - with all corresponding documentation - has been submitted, SURE conducts an internal assessment of the application and takes the decision on whether to approve the application. A written document between both parties (SURE scheme and the approved CB) is produced as legal binding agreement after successful application assessment. This legal agreement defines the terms and responsibilities for both parties in the scope of certification under the framework of the SURE-EU scheme. Registered CBs are only authorised to perform audits and issue certificates under the SURE-EU certification system once the legal agreement has been countersigned by both parties.

## **11 Rules on conducting the monitoring of certification bodies**

SURE performs a systematic monitoring of its approved certification bodies (CBs) and their certification activities as a part of its Integrity Management System. The CB performance and compliance monitoring focuses on ensuring that the certification bodies are following an impartial, thorough and consistent certification process within the SURE-EU scheme.

The SURE assesses the CB performance in relation to their monitoring and evaluation processes and multiple elements to ensure compliance with the regulations. The assessments include, e. g.:

- ✓ Timely development of audits and audit reports (as well of the timely issuance of certificates and other documentation);
- ✓ Impartiality in the internal audit report development process (ensured through internal peer

review process);

- ✓ Plausibility, consistency and significance of audit findings; and
- ✓ Appropriate and sufficient duration of the audit (in line with SURE certification processes requirements, as well as proportionate to the magnitude, scope and complexity of the operations subject to verification).

On instances of potential falls or misleading information reported by CB/s, SURE Secretariat are mandated to take a suitable action. This involves acquisition of clear information presiding to the matter following the process ordained in SURE's Integrity Management System. Failure to address the situation or issues listed by SURE Secretariat or/and based on the critical state of the matter, the CB ought to be excluded from the SURE certification system.

In addition to the integrity measures described above, the *scheme operator regularly carries out sample inspections of the audit reports as to ensure* that the:

Reports are complete

- ✓ Information contained in the reports is easily comprehensible
- ✓ Reports are coherent (plausibility and consistency between evaluation findings and audit results)
- ✓ Audit results are detailed, plausible and thorough and presented in a clear and concise manner.

As part of its system integrity efforts in 2024, SURE sampled a total of 207 certification procedures which were subject to internal assessment (whereby the completeness and quality of the documentation was internally evaluated, as well as the plausibility of the auditing findings and results).

The total number of valid SURE certificates in December 2024 was 4,625. As some certificates are linked to more than one audit report (due to additional surveillance audits conducted), a total of 5,213 audit reports were available within the SURE-EU system for the year 2024. The number of sampled auditing procedures for internal assessment purposes was 207. The number of certificates (178) and audit reports (118) internally evaluated in 2024 was more than two times and more than the internal monitoring target (73) (the monitoring target being evaluating a minimum sample equivalent to the square root of the total number of audit reports).

Below some facts and figures are provided with regards to the integrity monitoring activities conducted by SURE scheme for 2024:

- ✓ Number of reports/certificates sampled for internal integrity monitoring and evaluation: 296
  - Q1 January / February 2024: **128**
  - Q2 April – 2024: **57**
  - Q3 July-September: 2024: **69**
  - Q4 November 2024: **42**

SURE follows the methodology and criteria shown in *Table 2* below for selecting the samples of the audit procedures which shall be subject to monitoring and evaluation under the SURE Integrity Management System:

*Table 5: Criteria for random selection of certification bodies and scheme participants for internal integrity monitoring*

<b>Criteria for random selection of certification bodies and scheme participants for internal integrity monitoring of audit reports</b>	
<ul style="list-style-type: none"> <li>✓ Random sampling (all scheme participants and certification bodies may subject to SURE integrity program's monitoring)</li> <li>✓ Selection of specific reports/CBs/economic operators based on potential indications of non-compliance or misleading information</li> <li>✓ Minimum sample scope: <math>\sqrt{n}</math> of the total number of audit reports per quarter</li> </ul>	
<b>Risk-based criteria for the selection of scheme participants</b>	<b>Risk-based criteria for the selection of certification bodies</b>
<ul style="list-style-type: none"> <li>✓ Country/region</li> <li>✓ Scope of application</li> <li>✓ Type of biomass</li> <li>✓ Complexity of supply chain</li> <li>✓ Complaints/grievances raised in relation to the economic operator</li> </ul>	<ul style="list-style-type: none"> <li>✓ Number of audits conducted per certification body</li> <li>✓ Number of audits conducted per auditor</li> <li>✓ Significant deviations from average audit duration (25%)</li> <li>✓ Country/region of the activity</li> </ul>

The SURE-EU database is used as the data collection tool for conducting internal integrity evaluations following SURE's Integrity Management Systems.

Through the integrity monitoring evaluations conducted in 2024, the following main **areas of non-compliances were observed:**

**1) Lack of compliance/correctness of registered certification documentation by CBs**

The compliance trends taken from the sampling show, on the one hand, a rapid improvement in compliance with scheme requirements (see also 2) Failure to comply with the deadlines for reporting and issuing certificates) and, on the other hand, an apparent increase in certificate replacements and a few corrections that mainly affected certificate validity in 2024. The latter two were mostly necessary due to company sales or mergers (mainly in the supply chain from biomass to biogas to energy, which may indicate that sustainability certification has now become an integral part of an established market), scope extensions, correction of incorrect information given (e. g. typos, number transpositions etc.), and technical operating errors of the SURE database when uploading the certification documentation. The same can be said regarding the audit reports, as these are closely related to the issuance of certificates.

Depending on the importance of the corrections necessarily to be made, either the respective certification body was pointed out of the current underlying scheme regulations (preventive measures) or was requested to review the processing procedures established by the certification body (corrective measures). In addition, all certification bodies were informed, for example, through the annual exchanges of experience and notes, about the most significant corrections required and their various consequences for certification activities as well as about the scheme provider's expectation of avoidance of such.

## **2) Failure to comply with the deadlines for reporting and issuing certificates**

While in 2024 incidents were identified with regards of the lack of compliance by CBs of the new "60 day rule" (the need to issue a certificate within a time period of 60 days after the audit date), such incidents and delays can be explained by some misunderstanding in implementing this new time frame and respective processes at the CBs which could finally be clarified by the end of the second quarter.

## **3) Short duration of on-site audits**

Based on the information collected during the internal integrity assessments in 2024, the estimated time of an audit conducted on site ranges between 1 and 16 hours. Audits which were conducted within a short time frame may be explained by the fact that auditors often conduct combined audits (auditing various scopes or certification systems in one same site visit).

In the event SURE identified instances where the audit time dedicated appeared to be too short (potentially putting at risk the quality of the evaluation process), SURE proactively reached out to the CB to clarify the matter, requiring corrective actions if/when needed. In the scenario where systemic or systematic issues are identified (and the CB fails to implement the necessary corrective actions to address the issues, on a timely manner), SURE holds the right to exclude the corresponding CB from the SURE-EU system.

Other integrity measures undertaken by SURE scheme in 2023 as to ensure the impartiality and adequate performance of CBs included the following:

- Requesting CBs to repeat audits in particular instances where it was detected that the 60-day deadline between the audit on site and the date of certification decision was not met.
- Requesting CBs to repeat audits in instances where it was detected that the related certificates had been issued under incorrect assumptions and/or interpretations of SURE system requirements and/or specifications.
- The withdrawal of certificates in particular instances where it was detected that such certificates had been issued without ensuring full compliance with SURE system requirements.

In addition to the above, the quality and impartiality of audits with respect to auditors' skills and knowledge is also assessed by SURE scheme. All auditors must be registered with the SURE-EU scheme

following an application process through which the applicant auditors shall demonstrate to have the necessary knowledge, training and expertise to undertake audits under the SURE-EU certification framework.

Also in 2024, following its internal procedures, SURE continued to assess the profile and application of each applicant auditor, before the auditor is approved and able to conduct audits under the SURE scheme. In the event that any gaps in expertise or knowledge in the auditor’s profile were identified, this still was raised with the CB representative (and only when these gaps are addressed would the auditor be able to proceed to conduct SURE audits).

CBs certifying in the SURE-EU framework are unaltered required to regularly train and build capacity among auditors and staff working within the framework of the SURE-EU scheme, as to ensure they have updated knowledge about the developments, updates and interpretations of implementation of SURE certification requirements. With the purpose of internal training about SURE related topics, each CB shall nominate a minimum of one trainer which must have been trained directly by SURE Secretariat.

Besides the monitoring activities of competent authorities and accreditation bodies, SURE is authorized to perform 'special audits' - such as compliance and/or witness audits, which may be conducted at the office level and/or on site - as part of SURE’s Integrity Management System. These 'special audits' are conducted in extraordinary cases in which systemic or systematic potential issues may be detected (one more extensive case in year 2024), which raise potential concerns about the CB’s performance and thereby jeopardizing the credibility of the SURE-EU certification system.

In 2024, 244 certificates were suspended, withdrawn or not approved by the responsible CB and/or SURE Secretariat, as measures to ensure the consistency and quality of the overall certification system. The certificate withdrawal correlates with the number of certificates issued in the same period as indicated in June which also records the highest number of certificates issued. However, there is a general decrease in the number of certificates withdrawn or suspended towards the fourth quarter the year (Fig 12).

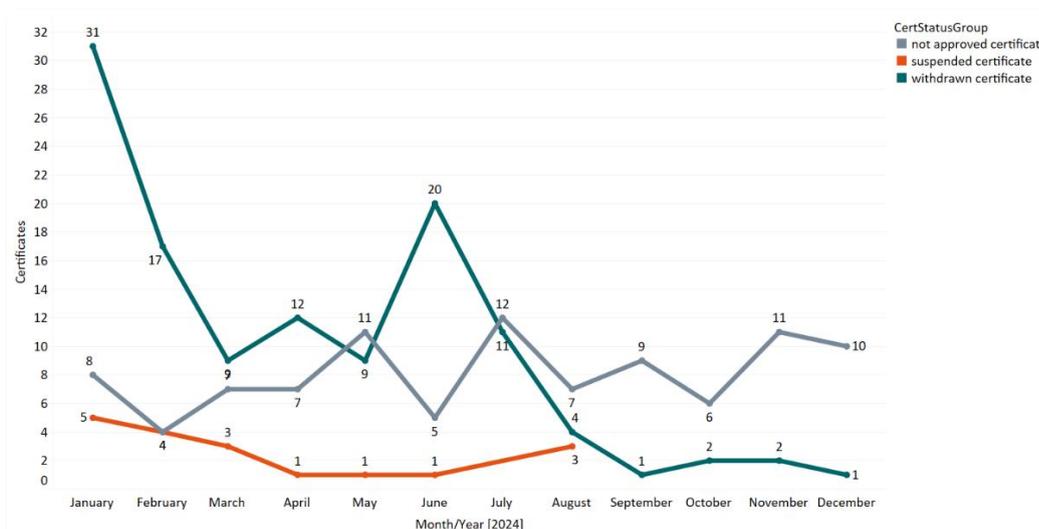


Figure 12: Trend of certificates withdrawn, not approved or suspended in the year 2024.

## 12 Assessment of major and critical non-conformities by economic operators in 2024

Non-conformities identified during an audit process within the SURE-EU certification system are classified as *critical, major and minor*.

An intentional violation of a voluntary scheme's standards such as fraud, irreversible non-conformity or any other violation of the scheme's requirements that jeopardises the integrity of the voluntary scheme is considered to be a *critical non-conformity*.

*Critical non-conformities* include, but are not limited to, the following:

- a) non-compliances with mandatory requirements under the framework of Directive (EU) 2018/2001 (such as land conversion which contravenes Article 29(3), (4) and (5) of that Directive);
- b) fraudulent issuances of proof of sustainability (such as the intentional duplication of proof of sustainability to seek financial benefit);
- c) deliberate production of wastes or residues (e.g. the deliberate modification of a production process to produce additional residue material, or the deliberate contamination of a material with the intention of classifying it as a waste).

Failure to comply with a mandatory requirement of Directive (EU) 2018/2001, where the non-conformity is potentially reversible, repeated and/or points to systematic problems, or aspects that alone, or in combination with further non-conformities, may result in a fundamental system failure, are considered to be a *major non-conformity*.

*Major non-conformities* include, but are not limited to, the following:

- a) systematic problems with mass balance or GHG data reported for example, incorrect documentation is identified in more than 10% of the claims included in the representative sample;
- b) the omission of an economic operator to declare its participation in other voluntary schemes during the certification process;
- c) failure to provide relevant information to auditors for example, mass balance data and audit reports.

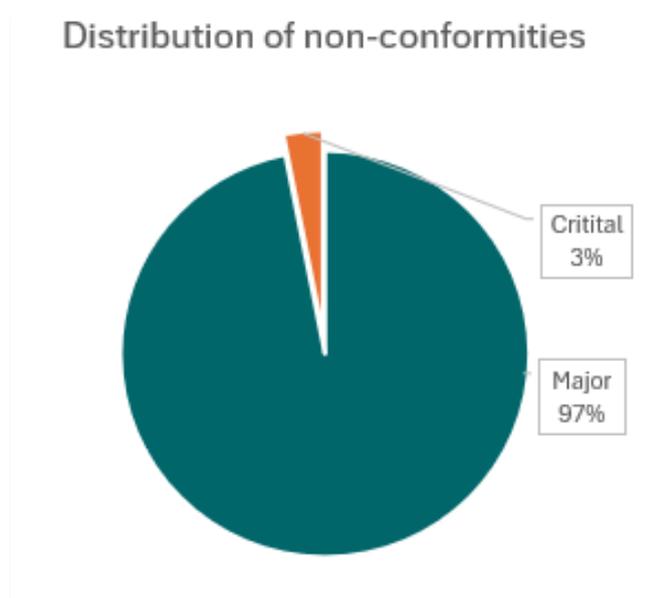
A non-conformity that has a limited impact, constitutes an isolated or temporary lapse, is not systematic and does not result in a fundamental failure if not corrected, is considered to be a *minor non-conformity* in the SURE-EU certification system.

As part of its internal assessment processes under the Integrity Management System at SURE-EU system and in line with Article 6(b) of the Implementing Regulation (EU) 2022/996, SURE internally analyses the number, type and nature of non-conformities (NCs) identified in the SURE-EU system and provides an aggregated analysis of identified non-conformities in the implementation of the SURE-EU

system together with the respective main findings. Aggregated information about identified critical or major NCs during audits conducted for interfaces is shown in [Table 6](#).

It should be noted that personal and confidential data of the affected economic operators, the certificates or audit reports has been redacted, as to comply with EU personal data protection legislation.

In total, 5,083 audit procedures were documented by SURE-registered certification bodies in 2024, whereas a total of 772 major and critical evaluations were documented for interfaces. 3% of the total number of major and critical NCs identified were classified as critical for 2024, this is shown in the [figure](#) below.



*Figure 13: Distribution of major and critical non-conformities issued in SURE-EU certification system for 2024.*

### Distribution of the identified major and critical NC's to the SURE-EU requirements

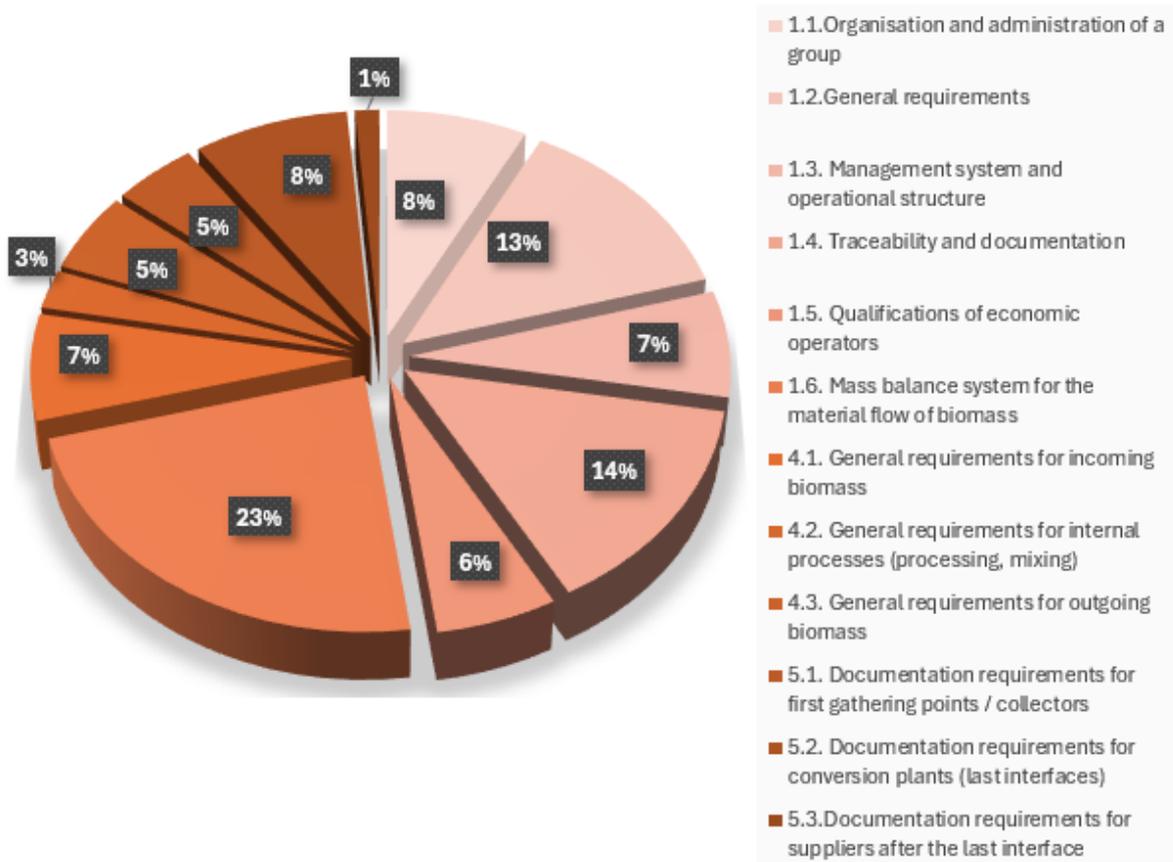


Figure 14: Distribution of the identified major and critical NCs to the SURE-EU requirements.

Figure 26 above shows the distribution of the identified major and critical NCs in relation to SURE-EU requirements in 2024.

As it can be observed in the *above figure*, more than 60% of the documented **major and critical non-conformities** identified for interfaces in 2024 in the SURE-EU certification system were found **in the following five areas:**

- ✓ Deficiencies in the implementation of the mass balancing system for the traceability of the material (biomass) flow
- ✓ Deficiencies in the documentation of the traceability thereof
- ✓ Issues with regards to the economic operator’s management system and operational structure;
- ✓ Failure to successfully fulfil the requirements for organising and administering a group of producers

- ✓ Failure to successfully fulfil documentation requirements applicable for conversion plants (last interfaces).

Table 6 below provides an overview of the identified critical or major Non-Conformities within the SURE-EU system for 2024 for interfaces, including the following elements

- ✓ Requirements for which critical and major non-conformities were detected;
- ✓ A specification of the individual SURE requirements that relate to the non-conformity (including the ID of the requirement as indicated in the audit report);
- ✓ The percentage of major and/or critical NCs detected during certification audits per requirement; and
- ✓ A summary/aggregation of the main findings and action/measures defined for correction of the violation of each SURE requirement identified with major and/or critical NCs.

Table 6: Aggregated list of the main findings and measures defined for correction of the violation of each SURE requirements identified with major and/or critical NCs

Unique ID of SURE requirement as stated in audit report	SURE requirement	Main findings	Percentage of evaluations identified with major and/or critical NCs	Main agreed corrective measures
1.1	Organisation and administration of a group	<ul style="list-style-type: none"> <li>- Self-declarations and/or supplier lists incomplete, not up-to-date, and/or incorrect</li> <li>- Lack of control/oversight of the group manager regarding internal monitoring of group members</li> <li>- no or little justified trust in the organizational structure for the proper administration of group certifications</li> <li>- New group members are not checked for their area status and self-declaration content before joining the group</li> <li>- Group members' responsibilities not clearly defined</li> <li>- Lack of consistent certification of upstream interfaces</li> <li>- Valid contracts/invoices between the individual group members and the group management not fully available</li> </ul>	8	<ul style="list-style-type: none"> <li>- Submission of incomplete, out-of-date, incorrect documentation</li> <li>- Training of the responsible group manager</li> </ul>
1.2	General requirements	-Organization's use of SURE trademark is not compliant	13	-update SURE trademark

Unique ID of SURE requirement as stated in audit report	SURE requirement	Main findings	Percentage of evaluations identified with major and/or critical NCs	Main agreed corrective measures
		<ul style="list-style-type: none"> <li>-lack of consistency of information in the UDB</li> <li>- Lack of consistency in the scope of information in SURE database and related activities</li> <li>- Affiliated (dependent) operating and storage sites not complete, and/or incorrectly registered in SURE database</li> <li>- Report of quantities of sustainable biomass according to SURE-EU not correctly entered in the database for the last calendar year</li> </ul>		<ul style="list-style-type: none"> <li>- Update data uploaded into SURE database and or UDB</li> <li>- Report corrected quantities to SURE system.</li> </ul>
1.3	Management systems and operational structure	<ul style="list-style-type: none"> <li>- Lack of a clear description of the organisational structure of the company</li> <li>- Lack of a complete documented procedure for dealing with non-conformities and/or preventive measures to mitigate future non-conformities from occurring</li> <li>- responsibility and duties of staff for SURE related work topics not clearly stipulated and documented</li> <li>-responsible persons knowledge not sufficient</li> </ul>	7	<ul style="list-style-type: none"> <li>- Development, establishment, implementation and submission of (corrected) documentation</li> <li>-training of responsible persons</li> </ul>
1.4	Traceability and documentation	<ul style="list-style-type: none"> <li>- Documentation requirements partially fulfilled, significant gaps and/or inaccuracies identified</li> <li>- Documents and records (partially) incomplete and/or not clearly legible, and/ or not sufficiently transparent and/or incomplete</li> <li>- No clear link/ association between the data reported on the biomass volumes and the corresponding records/ documentation submitted as substantiated evidence.</li> <li>- Self-declaration(s) submitted to the group manager are not fully eligible, complete and correct</li> <li>- Not all consignments to and/or services for other economic operators are clearly and adequately contractually defined (including a lack of clear documentation of</li> </ul>	14	<ul style="list-style-type: none"> <li>- Development, establishment, implementation and submission of (corrected) documentation</li> </ul>

Unique ID of SURE requirement as stated in audit report	SURE requirement	Main findings	Percentage of evaluations identified with major and/or critical NCs	Main agreed corrective measures
		<p>the respective flow of goods through the system)</p> <ul style="list-style-type: none"> <li>- Not all necessary data and information was provided to the buyer of the sustainable biomass</li> <li>- Confidential handling of sensitive company-related data passed on to the downstream operations is not defined and specified in writing</li> <li>-scheme requirements of issuance of proofs of sustainability not or partially not fulfilled (e.g. SURE template, national databases, UDB)</li> </ul>		
1.5	Qualifications of economic operators	<ul style="list-style-type: none"> <li>- Lack of sufficient awareness about the requirements of Directive (EU) 2018/2001 and SURE certification by the responsible employees involved in the certification process</li> <li>- no or not sufficiently verifiably training to fulfil duties or their qualifications cannot be plausibly proven</li> <li>- Economic operator cannot demonstrate that employees are aware of how the risk of potential non-conformities can be reduced</li> <li>- Lack of sufficient evidence regulating the internal handling of non-conformities identified through the certification process</li> </ul>	6	<ul style="list-style-type: none"> <li>- Provide written evidence of additional trainings/capacity building activities in relevant topics pertaining to SURE certification (and internal management of the certification process and results);</li> </ul>
1.6	Mass balance system for the material flow of biomass	<ul style="list-style-type: none"> <li>- Inconsistent, implausible, incomplete, incorrect, and/or non-existent mass balance system</li> <li>- Lack of sufficient and technically sound tools and/or procedures to carry out the traceability of biomass volumes through mass balance systems accurate and appropriate</li> <li>-balancing of sustainable biomass does not occur at permissible intervals</li> <li>- Mass balance accounting process not complete and correct</li> </ul>	23	<ul style="list-style-type: none"> <li>- Set up a mass balance system with regards to consistency, plausibility, completeness, correctness</li> <li>- Improve technical tools and/or procedures provided internally</li> </ul>

Unique ID of SURE requirement as stated in audit report	SURE requirement	Main findings	Percentage of evaluations identified with major and/or critical NCs	Main agreed corrective measures
4.1	General requirements for incoming biomass	<p>- Delivery documents do not contain the following information for each delivery of quantity of sustainable biomass:</p> <ul style="list-style-type: none"> <li>• Name and address of the supplier/upstream operation</li> <li>• Certificate number and name of the certification scheme</li> <li>• Complete and signed self-declaration in the case of no self-certified producers</li> <li>• Type of sustainable biomass</li> <li>• Quantity of sustainable biomass</li> <li>• Date of receipt</li> <li>• Country of cultivation or origin of the biomass;</li> </ul> <p>-Lack of clear records of whom conducted the inspection and verified the data and quantities upon receipt of the sustainable biomass in the operations</p> <p>-GHG information has not been specified on suppliers documentation</p>	7	<p>-Submit updated delivery notes;</p> <p>-Regulation of responsibilities for verification of incoming goods</p>
4.2	General requirements for internal processes (processing, mixing)	<p>- Lack of complete records in the mass balance system of every newly produced quantity of biomass (resulting from internal processes)</p> <p>- Lack of complete internal records including the following data:</p> <ul style="list-style-type: none"> <li>• Type of internal process (e.g. drying, pelleting, mixing, etc.)</li> <li>• Quantity of sustainable biomass that went into the process</li> <li>• Quantity of sustainable biomass that went out of the process</li> <li>• Process and facility-specific conversion rates/conversion factors (kg/kg) / losses for intermediate products</li> <li>• Process and facility-specific conversion rates/conversion factors (MJ/MJ) / losses for end products</li> </ul>	3	<p>- Periodic training of employees, establishment of a continuous documentation system, new mass balance sheet</p>

Unique ID of SURE requirement as stated in audit report	SURE requirement	Main findings	Percentage of evaluations identified with major and/or critical NCs	Main agreed corrective measures
4.3	General requirements for outgoing biomass	<p>- Not all of following minimum data recorded and if relevant, transmitted to the downstream operation:</p> <ul style="list-style-type: none"> <li>• Certificate number and name of the certification scheme</li> <li>• Type of sustainable biomass</li> <li>• Quantity of sustainable biomass</li> <li>• Date of receipt</li> <li>• Country of cultivation or origin of the biomass</li> <li>• Comparison of quantities between incoming and outgoing biomass not plausible</li> </ul> <p>-No GHG value or country of origin is available on sales documentation</p> <p>-records do not make it possible to establish a connection to the documented incoming biomass</p>	5	<p>- Sales invoices to be amended by including the required information and submitted to the related client</p> <p>- Facts and data must be checked by the interface and transparently presented to the certification body</p> <p>delivery invoices must be adapted accordingly</p>
5.1	Documentation requirements for first gathering points / collectors	<p>- Self-declarations of the farms/waste producers not sufficiently checked for plausibility and completeness by the first gathering point</p> <p>- Biomass not transparently assigned to the respective farm/waste producer</p> <p>- Respective location of forestry biomass cultivation not documented</p>	5	<p>- Obtaining and submitting the correct/missing self-declarations</p> <p>- Submission of proof of land use</p> <p>- Submission of the corresponding self-declaration and/or certificate to the respective supplier</p>
5.2	Documentation requirements for conversion plants (last interfaces)	<p>-Not all of the following minimum data recorded and, if relevant, transmitted to the downstream operation:</p> <ul style="list-style-type: none"> <li>• Certificate number and the name of the certification scheme</li> <li>• Type of final energy produced (electricity, heat, etc.)</li> </ul>	8	<p>-Correction of relevant data, templates and information and transmission to the downstream operation</p>

Unique ID of SURE requirement as stated in audit report	SURE requirement	Main findings	Percentage of evaluations identified with major and/or critical NCs	Main agreed corrective measures
		<ul style="list-style-type: none"> <li>• The amount of sustainably generated final energy</li> <li>• The date of energy production</li> <li>• GHG emissions from energy production if required [in gCO<sub>2</sub>eq/MJ]</li> <li>• Type of biomass used</li> <li>• Country of origin of the biomass used</li> <li>• Country where the conversion plant is located</li> <li>• Name of the financial support used for the production of energy (if applicable)</li> </ul> <p>- Records for electricity production do not make it possible to establish a clear connection between the reported biomass quantities and the documentation provided as evidence of the incoming biomass</p> <p>-comparison of quantities between incoming biomass and generated final energy not plausible</p> <p>- Scheme requirements are not satisfied when the proof of sustainability is issued</p> <p>- Issued proofs of sustainability is not complete, correct and consistent with SURE templates</p>		where necessary
5.3	Documentation requirements for suppliers after the last interface	<p>- No (partial) proof of sustainability issued for all electricity or heat/cooling supplied after the last interface;</p> <p>- The mass balance system of the service provider does not ensure that the information from the (partial) proof of sustainability received is correctly transferred when issuing (partial) proof of sustainability (both when biomass is divided up into smaller quantities as well as mixed)</p>	1	- Correction of the relevant data

According to SURE system requirements, corrective measures evaluated as major NCs must be implemented (and verifiable) no later than 40 days after the audit. Corrective measures evaluated as critical NCs must be implemented (and verifiable) no later than 30 days after the audit.

### **13 Possibilities to facilitate or improve promotion of best practice**

SURE certification is a system developed in continuous exchange and involvement with stakeholders in the bioenergy and biomass sector.

By involving a variety of stakeholders from different backgrounds and expertise and economic groups affected, particularly industry experts representing economic operators of the different phases of the biomass and bioenergy supply chains, SURE certification system ensures that its rules and requirements are developed from a practical and pragmatic perspective, where the practicalities of implementation are always taken into consideration, while also ensuring that the principles of sustainability and transparency are respected.

The SURE Technical Committee (previously mentioned in this report) provides a platform for dialogue for stakeholders and industry experts with different backgrounds, encouraging and to promoting the exchange of ideas to drive the continuous improvement of the SURE system, and whereby cases of best practices in the industry are highlighted, as to create momentum and positive impact across the bioenergy sector.

SURE scheme provides multiple opportunities and tools for stakeholder engagement, from platforms for dialogue, to public information, including the below:

- ✓ SURE Newsletter (regular newsletter registration with free access for any interested stakeholder)
- ✓ CB mailing lists providing policy updates and interpretations of SURE scheme principles (and any other relevant information pertaining to CBs and auditors)
- ✓ News section in SURE website (where relevant scheme developments and other topics are announced)
- ✓ Trainings, workshops and webinars (building knowledge and awareness about sustainable biomass, RED II and SURE certification)
- ✓ Presentation at seminars and conferences on the topic of sustainable biomass fuel
- ✓ Publication of press releases (national/international journal)
- ✓ [SURE LinkedIn page](#) (where articles are published showcasing best practices by the industry and key scheme developments and events are announced)
- ✓ Public consultation of SURE Risk Assessments (where feedback can be provided by stakeholders to inform the level of risk associated to the sourcing of forest biomass in a particular region or country) SURE cooperates with all national competent authorities of EU Member States, providing information and clarity to governmental bodies as needed.

In 2023, SURE scheme continued to cooperate with other voluntary schemes with respect to inter-scheme-tracking of major non-conformities and collaborate with regards to the recognition of certificates issued by other recognized schemes (as stipulated in RED II and the related Implementing Regulation). The practical implementation of the RED II has raised a couple of questions which have

been addressed and discussed among the voluntary schemes through fruitful dialogue and collaboration. The need for collaboration between recognized schemes is further highlighted in the RED II 'Implementing Act', which requires an ongoing exchange of information and discussion among recognized schemes.

#### **14 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 minimize the probability that unsustainable forest biomass is sourced, by following a structured approach and methodology for the assessment of risk.

The risk assessment methodology defined in the SURE scheme is described in detail in the normative document ['Technical Guidance for the assessment of the risk of unsustainable production of forest biomass'](#).

The risk-based approach for forest biomass in the SURE-EU system assesses whether the sustainability criteria defined in RED II Directive (and embedded in SURE scheme principles for the production of forest biomass) are already sufficiently implemented through national or sub-national legislation in the specific biomass sourcing area subject to the risk assessment, as well as whether the compliance with national and/or sub-national legislation related to the sustainability criteria is being monitored and evaluated by the relevant competent authorities effectively, as well as whether, if necessary, sanctions are being issued in instances where non-compliances may be identified.

If the risk assessment concludes that the RED II sustainability criteria are being enforced through the implementation and monitoring of the relevant forest management legislation and that the laws and regulations are reliably enforced and monitored by the competent authorities, then the risk assessment for this particular sourcing region would conclude that the risk that the biomass was harvested from unsustainably managed forests is considered to be low (aka 'Low Risk').

The aim of the risk-based approach in the SURE-EU system is to ensure that SURE certified forest biomass is harvested 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*:

- ✓ **Steps 1 and 2** of the risk assessment process are mandatory and correspond with the identification of applicable laws and description of law enforcement and monitoring in the sourcing area subject to the risk assessment. This information is crucial in order to determine the risk level of the sourcing of forest biomass in the area (either 'Low-risk' or 'Specified-risk').

- ✓ **Step 3** is optional, aiming to assess the *effectiveness of the legal framework* applicable in the sourcing area, as identified in steps 1 and 2.

Leading questions to be used in the implementation of the three-step risk assessment methodology:

**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 sustainability criteria was concluded not to be fully implemented or found to be unsubstantiated (in accordance with the SURE document ['Scheme principles for the production of forest biomass'](#) 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 Secretariat. The development of the risk assessment must be conducted following a public, transparent and inclusive stakeholder engagement process.

As of 31 December 2024,, five risk assessments have been approved in the SURE system: Germany, France, Austria, Lithuania and the Czech Republic.

A comprehensive and complete description of the procedure for preparing a risk assessments in the SURE-EU system and guidance on how to evaluate the results can be found in the SURE document [\*'Technical Guidance for the assessment of the risk of unsustainable production of forest biomass'\*](#).

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 December 31<sup>st</sup> 2024

Certification Body	Country	Entity responsible for the recognition or accreditation* *= *Accreditation against ISO/IEC 17065
AGRIZERT Zertifizierungs GmbH	Germany	BLE (Federal Office for Agriculture and Food)
auditcert GmbH Umweltgutachterorganisation	Germany	BLE (Federal Office for Agriculture and Food)
BM Certification, SIA	Latvia	Latvian National Accreditation Bureau
Bureau Veritas Polska Sp. z o.o.	Poland	Polskie Centrum Akredytacji
CGN CERTIFICATION	Spain	American National Standards Institute (ANSI)
Control Union Certifications Germany GmbH	Germany	BLE (Federal Office for Agriculture and Food)
Control Union Poland Sp. z o.o.	Poland	Krajowy Ośrodek Wsparcia Rolnictwa (KOWR)
DEKRA Certification GmbH	Germany	BLE (Federal Office for Agriculture and Food)
DIN CERTCO Gesellschaft für Konformitätsbewertung mbH	Germany	BLE (Federal Office for Agriculture and Food)
DQS Polska sp. z o.o.	Poland	Krajowy Ośrodek Wsparcia Rolnictwa (KOWR)
ESC Cert GmbH	Germany	BLE (Federal Office for Agriculture and Food)
GFA Certification GmbH	Germany	BLE (Federal Office for Agriculture and Food)
greencert. Umweltgutachter GmbH	Germany	BLE (Federal Office for Agriculture and Food)
GUT Zertifizierungsgesellschaft für Managementsysteme mbH Umweltgutachter	Germany	BLE (Federal Office for Agriculture and Food)
Holzforschung Austria	Austria	Akkreditierung Austria
IFTA AG	Germany	BLE (Federal Office for Agriculture and Food)
IFU-CERT Zertifizierungsgesellschaft für Managementsysteme mbH	Germany	BLE (Federal Office for Agriculture and Food)
Intechnica Cert GmbH	Germany	BLE (Federal Office for Agriculture and Food)
Müller-BBM Cert Umweltgutachter GmbH	Germany	BLE (Federal Office for Agriculture and Food)

Certification Body	Country	Entity responsible for the recognition or accreditation* *= *Accreditation against ISO/IEC 17065
Normec Zertifizierung Umweltgutachter GmbH	Germany	BLE (Federal Office for Agriculture and Food)
NCS Estonia OÜ	Estonia	Eesti Akrediteerimiskeskus (Estonian Accreditation Centre)
OmniCert Umweltgutachter GmbH	Germany	BLE (Federal Office for Agriculture and Food)
Petersberger Zertifizierungsgesellschaft mbH	Germany	BLE (Federal Office for Agriculture and Food)
Preferred by Nature OÜ	Estonia	Eesti Akrediteerimiskeskus (Estonian Accreditation Centre)
proTerra Umweltschutz- und Managementberatung GmbH Umweltgutachter	Germany	BLE (Federal Office for Agriculture and Food)
QAL Umweltgutachter GmbH	Germany	BLE (Federal Office for Agriculture and Food)
Quality Austria Trainings, Zertifizierungs und Beratungs GmbH	Austria	Akkreditierung Austria
SC@PE International GmbH.	Germany	BLE (Federal Office for Agriculture and Food)
Score GmbH Umweltgutachter	Germany	BLE (Federal Office for Agriculture and Food)
SGS Germany GmbH	Germany	BLE (Federal Office for Agriculture and Food)
SGS Polska sp. z o.o.	Poland	Krajowy Ośrodek Wsparcia Rolnictwa (KOWR)
Siec Badawcza Lukasiewicz - Przemysłowy Instytut Motoryzacji (PIMOT)	Poland	Krajowy Ośrodek Wsparcia Rolnictwa (KOWR)
TRANS CERTIFICATION & INSPECTION SDN. BHD	Malaysia	Department of Standards Malaysia
TÜV AUSTRIA GmbH	Austria	Akkreditierung Austria
TÜV NORD CERT GmbH	Germany	BLE (Federal Office for Agriculture and Food)
TÜV SÜD Czech s.r.o.	Czech Republic	Český institut pro akreditaci, o.p.s.
TÜV SÜD Industrie Service GmbH	Germany	BLE (Federal Office for Agriculture and Food)
TÜV Süd Landesgesellschaft Österreich GmbH	Austria	Akkreditierung Austria
United Registrar of Systems Polska Sp. z o.o.	Poland	Krajowy Ośrodek Wsparcia Rolnictwa (KOWR)
ValueCert Hub & Partner mbH Umweltgutachter, Sachverständige und Auditoren	Germany	BLE (Federal Office for Agriculture and Food)
ZER-QMS Zertifizierungsstelle, Qualitäts- und Umweltgutachter GmbH	Germany	BLE (Federal Office for Agriculture and Food)

## Annex II: Aggregated volumes of feedstock certified under the SURE-EU system in 2024

Type of feedstock	Country of origin	Value (Tonnes)
Animal manure and sewage sludge	Austria	76,382
Animal manure and sewage sludge	Belgium	14,906
Animal manure and sewage sludge	Czech Republic	29,518
Animal manure and sewage sludge	Germany	12,313,451
Animal manure and sewage sludge	Luxembourg	215,045
Animal manure and sewage sludge	Netherlands	74,285
Animal manure and sewage sludge	Poland	30,077
Animal manure and sewage sludge	Slovenia	15,960
Animal manure and sewage sludge	Spain	184,052
Animal manure and sewage sludge	Switzerland	2,526
Biomass fraction of industrial wastes	Austria	1,165,503
Biomass fraction of industrial wastes	Belgium	28,280
Biomass fraction of industrial wastes	Croatia	53,879
Biomass fraction of industrial wastes	Czech Republic	258,941
Biomass fraction of industrial wastes	Estonia	8,260
Biomass fraction of industrial wastes	France	57,516
Biomass fraction of industrial wastes	Germany	926,509
Biomass fraction of industrial wastes	Hungary	10,623
Biomass fraction of industrial wastes	Indonesia	1,872
Biomass fraction of industrial wastes	Ireland	154,363
Biomass fraction of industrial wastes	Italy	20,452

Type of feedstock	Country of origin	Value (Tonnes)
Biomass fraction of industrial wastes	Latvia	42,640
Biomass fraction of industrial wastes	Lithuania	216,983
Biomass fraction of industrial wastes	Luxembourg	242,377
Biomass fraction of industrial wastes	Netherlands	343
Biomass fraction of industrial wastes	Poland	707,093
Biomass fraction of industrial wastes	Portugal	51,783
Biomass fraction of industrial wastes	Romania	429,571
Biomass fraction of industrial wastes	Slovakia	110,969
Biomass fraction of industrial wastes	Slovenia	129,945
Biomass fraction of industrial wastes	Spain	268,838
Biomass fraction of industrial wastes	Ukraine	15,900
Biomass fraction of industrial wastes	United States of America	20,856
Biomass fraction of wastes and residues from forestry and forest-based industries	Austria	794,646
Biomass fraction of wastes and residues from forestry and forest-based industries	Belgium	42,846
Biomass fraction of wastes and residues from forestry and forest-based industries	Croatia	29,018
Biomass fraction of wastes and residues from forestry and forest-based industries	Czech Republic	433,842
Biomass fraction of wastes and residues from forestry and forest-based industries	Denmark	2,926
Biomass fraction of wastes and residues from forestry and forest-based industries	Estonia	38,610
Biomass fraction of wastes and residues from forestry and forest-based industries	France	42,309
Biomass fraction of wastes and residues from forestry and forest-based industries	Germany	1,618,146
Biomass fraction of wastes and residues from forestry and forest-based industries	Hungary	120,511
Biomass fraction of wastes and residues from forestry and forest-based industries	Ireland	7,353

Type of feedstock	Country of origin	Value (Tonnes)
Biomass fraction of wastes and residues from forestry and forest-based industries	Italy	723
Biomass fraction of wastes and residues from forestry and forest-based industries	Latvia	375,849
Biomass fraction of wastes and residues from forestry and forest-based industries	Lithuania	159,555
Biomass fraction of wastes and residues from forestry and forest-based industries	Luxembourg	4,450
Biomass fraction of wastes and residues from forestry and forest-based industries	Netherlands	178
Biomass fraction of wastes and residues from forestry and forest-based industries	Norway	991
Biomass fraction of wastes and residues from forestry and forest-based industries	Poland	760,206
Biomass fraction of wastes and residues from forestry and forest-based industries	Portugal	89,598
Biomass fraction of wastes and residues from forestry and forest-based industries	Romania	13,279
Biomass fraction of wastes and residues from forestry and forest-based industries	Slovakia	92,125
Biomass fraction of wastes and residues from forestry and forest-based industries	Slovenia	144,175
Biomass fraction of wastes and residues from forestry and forest-based industries	Spain	1,445,958
Biomass fraction of wastes and residues from forestry and forest-based industries	Switzerland	526
Biomass fraction of wastes and residues from forestry and forest-based industries	Ukraine	1,867
Biowaste (e.g. food waste)	Austria	45,762
Biowaste (e.g. food waste)	Czech Republic	512
Biowaste (e.g. food waste)	Germany	1,684,398
Biowaste (e.g. food waste)	Hungary	698
Biowaste (e.g. food waste)	Luxembourg	11,888
Biowaste (e.g. food waste)	Netherlands	1,648
Biowaste (e.g. food waste)	Slovakia	1,476
Biowaste (e.g. food waste)	Spain	32,098

Type of feedstock	Country of origin	Value (Tonnes)
Corn	Austria	14,963
Corn	Belgium	1,308
Corn	Czech Republic	40,039
Corn	Denmark	79,716
Corn	Germany	17,792,532
Corn	Hungary	25
Corn	Luxembourg	35,955
Corn	Poland	137,032
Corn	Spain	4,061
Forest biomass	Austria	1,705,111
Forest biomass	Belgium	8,355
Forest biomass	Croatia	52,035
Forest biomass	Czech Republic	54,918
Forest biomass	France	911,134
Forest biomass	Germany	786,784
Forest biomass	Hungary	105,893
Forest biomass	Ireland	26,486
Forest biomass	Italy	1,736
Forest biomass	Latvia	10,078
Forest biomass	Lithuania	32,993
Forest biomass	Poland	310,493
Forest biomass	Portugal	69,294

Type of feedstock	Country of origin	Value (Tonnes)
Forest biomass	Romania	2,005
Forest biomass	Slovakia	33,463
Forest biomass	Slovenia	184,881
Forest biomass	Spain	350,321
Forest biomass	United Kingdom	32,337
Other cereals	Austria	4,987
Other cereals	Czech Republic	9,857
Other cereals	Germany	1,189,654
Other cereals	Luxembourg	776
Other cereals	Poland	479
Other cereals	Spain	137
Other feedstock	Austria	6,395
Other feedstock	Czech Republic	12,404
Other feedstock	Denmark	2,345
Other feedstock	Germany	2,537,379
Other feedstock	Luxembourg	12,893
Other non-food cellulosic material	Austria	28,297
Other non-food cellulosic material	Czech Republic	912
Other non-food cellulosic material	Denmark	29,573
Other non-food cellulosic material	France	1,387
Other non-food cellulosic material	Germany	3,364,704
Other non-food cellulosic material	Hungary	24,658

Type of feedstock	Country of origin	Value (Tonnes)
Other non-food cellulosic material	Ireland	1,500
Other non-food cellulosic material	Latvia	4,560
Other non-food cellulosic material	Lithuania	1,471
Other non-food cellulosic material	Luxembourg	1,659
Other non-food cellulosic material	Malaysia	27,075
Other non-food cellulosic material	Netherlands	2,100
Other non-food cellulosic material	Nigeria	3,846
Other non-food cellulosic material	Poland	152,849
Other non-food cellulosic material	Portugal	60,311
Other non-food cellulosic material	Romania	1,062
Other non-food cellulosic material	Sierra Leone	2,595
Other non-food cellulosic material	Slovakia	3,247
Other non-food cellulosic material	Spain	888,905
Other non-food cellulosic material	Ukraine	13,920
Other waste/residue from biomass	Austria	1,767,875
Other waste/residue from biomass	Croatia	30,370
Other waste/residue from biomass	Czech Republic	32,332
Other waste/residue from biomass	France	11,350
Other waste/residue from biomass	Germany	3,295,837
Other waste/residue from biomass	Hungary	1,140
Other waste/residue from biomass	Indonesia	0
Other waste/residue from biomass	Ireland	15,000

Type of feedstock	Country of origin	Value (Tonnes)
Other waste/residue from biomass	Italy	32,346
Other waste/residue from biomass	Latvia	1,341
Other waste/residue from biomass	Lithuania	1,441
Other waste/residue from biomass	Luxembourg	3,242
Other waste/residue from biomass	Netherlands	20,982
Other waste/residue from biomass	Nigeria	318
Other waste/residue from biomass	Poland	195,218
Other waste/residue from biomass	Portugal	73,931
Other waste/residue from biomass	Romania	250
Other waste/residue from biomass	Slovakia	7,550
Other waste/residue from biomass	Slovenia	30,145
Other waste/residue from biomass	Spain	2,442,341
Other waste/residue from biomass	Ukraine	39,191
Waste Wood (post consumer)	Austria	303,239
Waste Wood (post consumer)	Belgium	12,636
Waste Wood (post consumer)	Croatia	13,309
Waste Wood (post consumer)	Czech Republic	27,954
Waste Wood (post consumer)	Denmark	29,472
Waste Wood (post consumer)	France	66,998
Waste Wood (post consumer)	Germany	2,947,210
Waste Wood (post consumer)	Ireland	25,288
Waste Wood (post consumer)	Italy	7,263

Type of feedstock	Country of origin	Value (Tonnes)
Waste Wood (post consumer)	Luxembourg	6,816
Waste Wood (post consumer)	Netherlands	271,558
Waste Wood (post consumer)	Poland	10,225
Waste Wood (post consumer)	Romania	293
Waste Wood (post consumer)	Slovakia	745
Waste Wood (post consumer)	Slovenia	16,005
Waste Wood (post consumer)	Spain	8,722
Waste Wood (post consumer)	Switzerland	7,949
Wheat	Czech Republic	461
Wheat	Germany	84,538
Wheat	Luxembourg	9
Wheat	Spain	694

### Annex III: Aggregated volumes of biomass fuels certified under the SURE-EU system in 2024

Types of Biofuels	Country of origin	Type of feedstock	Value (Tonnes)
Biomethane	Austria	Animal manure and sewage sludge	163
Biomethane	Austria	Biomass fraction of industrial wastes	240
Biomethane	Austria	Biowaste (e.g. food waste)	2,592
Biomethane	Austria	Corn	2,365
Biomethane	Austria	Other cereals	2,665
Biomethane	Austria	Other feedstock	127
Biomethane	Austria	Other non-food cellulosic material	2,389
Biomethane	Austria	Other waste/residue from biomass	21,503
Biomethane	Belgium	Animal manure and sewage sludge	2,550
Biomethane	Belgium	Corn	16
Biomethane	Belgium	Other feedstock	77
Biomethane	Belgium	Other non-food cellulosic material	177
Biomethane	Belgium	Other waste/residue from biomass	240
Biomethane	Czech Republic	Animal manure and sewage sludge	981
Biomethane	Czech Republic	Biomass fraction of industrial wastes	3,208
Biomethane	Czech Republic	Corn	2,537
Biomethane	Czech Republic	Other cereals	353
Biomethane	Czech Republic	Other feedstock	162
Biomethane	Czech Republic	Other non-food cellulosic material	24
Biomethane	Czech Republic	Other waste/residue from biomass	166

Biomethane	Czech Republic	Wheat	217
Biomethane	Denmark	Animal manure and sewage sludge	441
Biomethane	Denmark	Biowaste (e.g. food waste)	715
Biomethane	Denmark	Corn	6,676
Biomethane	Denmark	Other cereals	342
Biomethane	Denmark	Other non-food cellulosic material	453
Biomethane	Denmark	Other waste/residue from biomass	181
Biomethane	France	Animal manure and sewage sludge	11,521
Biomethane	France	Other waste/residue from biomass	32
Biomethane	Germany	Animal manure and sewage sludge	333,375
Biomethane	Germany	Biomass fraction of industrial wastes	2,838
Biomethane	Germany	Biomass fraction of wastes and residues from forestry and forest-based industries	16,293
Biomethane	Germany	Biowaste (e.g. food waste)	107,511
Biomethane	Germany	Corn	1,607,731
Biomethane	Germany	Other cereals	151,596
Biomethane	Germany	Other feedstock	212,448
Biomethane	Germany	Other non-food cellulosic material	374,920
Biomethane	Germany	Other waste/residue from biomass	78,846
Biomethane	Germany	Wheat	11,129
Biomethane	Lithuania	Other waste/residue from biomass	197
Biomethane	Luxembourg	Animal manure and sewage sludge	3,137
Biomethane	Luxembourg	Biomass fraction of wastes and residues from forestry and forest-based industries	95
Biomethane	Luxembourg	Biowaste (e.g. food waste)	1,031

Biomethane	Luxembourg	Corn	1,500
Biomethane	Luxembourg	Other cereals	76
Biomethane	Luxembourg	Other feedstock	492
Biomethane	Luxembourg	Other non-food cellulosic material	34
Biomethane	Luxembourg	Other waste/residue from biomass	122
Biomethane	Luxembourg	Wheat	2
Biomethane	Netherlands	Animal manure and sewage sludge	2,335
Biomethane	Netherlands	Biowaste (e.g. food waste)	252
Biomethane	Netherlands	Other cereals	103
Biomethane	Netherlands	Other non-food cellulosic material	52
Biomethane	Netherlands	Other waste/residue from biomass	571
Biomethane	Norway	Other waste/residue from biomass	8
Biomethane	Poland	Animal manure and sewage sludge	1,411
Biomethane	Poland	Biomass fraction of industrial wastes	4,461
Biomethane	Poland	Corn	54,741
Biomethane	Poland	Other cereals	311
Biomethane	Poland	Other non-food cellulosic material	1
Biomethane	Poland	Other waste/residue from biomass	2,191
Biomethane	Poland	Wheat	13
Biomethane	Romania	Other waste/residue from biomass	134
Biomethane	Slovakia	Biomass fraction of industrial wastes	852
Biomethane	Spain	Animal manure and sewage sludge	3,883
Biomethane	Spain	Biowaste (e.g. food waste)	224

Biomethane	Spain	Other waste/residue from biomass	2,074
Biomethane	Sweden	Biowaste (e.g. food waste)	176
Biomethane	Switzerland	Animal manure and sewage sludge	103
Biomethane	United Kingdom	Corn	221
Biomethane	United Kingdom	Other cereals	110
Biomethane	United Kingdom	Other feedstock	46
Biomethane	United Kingdom	Other non-food cellulosic material	17
Biomethane	United Kingdom	Other waste/residue from biomass	1,385
Biomethane	USA	Other waste/residue from biomass	46
Other biomass fuels	Austria	Animal manure and sewage sludge	84,263
Other biomass fuels	Austria	Biomass fraction of industrial wastes	609,958
Other biomass fuels	Austria	Biomass fraction of wastes and residues from forestry and forest-based industries	491,080
Other biomass fuels	Austria	Biowaste (e.g. food waste)	414
Other biomass fuels	Austria	Forest biomass	134,347
Other biomass fuels	Austria	Other non-food cellulosic material	1,752
Other biomass fuels	Austria	Other waste/residue from biomass	3,125,461
Other biomass fuels	Austria	Waste Wood (post consumer)	146,497
Other biomass fuels	Belgium	Corn	7,748
Other biomass fuels	Belgium	Other non-food cellulosic material	79,030
Other biomass fuels	Croatia	Biomass fraction of industrial wastes	8,815
Other biomass fuels	Croatia	Forest biomass	13,038
Other biomass fuels	Croatia	Other waste/residue from biomass	18,852
Other biomass fuels	Czech Republic	Biomass fraction of industrial wastes	449,290

Other biomass fuels	Czech Republic	Forest biomass	2,157
Other biomass fuels	Czech Republic	Other non-food cellulosic material	106
Other biomass fuels	Czech Republic	Other waste/residue from biomass	1,274,478
Other biomass fuels	Estonia	Other non-food cellulosic material	3,612
Other biomass fuels	France	Biomass fraction of industrial wastes	69,720
Other biomass fuels	France	Biomass fraction of wastes and residues from forestry and forest-based industries	798
Other biomass fuels	France	Forest biomass	68,461
Other biomass fuels	France	Other non-food cellulosic material	45,063
Other biomass fuels	France	Other waste/residue from biomass	11,643
Other biomass fuels	France	Waste Wood (post consumer)	17
Other biomass fuels	Germany	Animal manure and sewage sludge	45,246
Other biomass fuels	Germany	Biomass fraction of industrial wastes	868,999
Other biomass fuels	Germany	Biomass fraction of wastes and residues from forestry and forest-based industries	543,767
Other biomass fuels	Germany	Biowaste (e.g. food waste)	173,025
Other biomass fuels	Germany	Corn	64,593
Other biomass fuels	Germany	Forest biomass	72,943
Other biomass fuels	Germany	Other cereals	4,658
Other biomass fuels	Germany	Other feedstock	10,167
Other biomass fuels	Germany	Other non-food cellulosic material	87,254
Other biomass fuels	Germany	Other waste/residue from biomass	621,208
Other biomass fuels	Germany	Waste Wood (post consumer)	1,145,961
Other biomass fuels	Germany	Wheat	653
Other biomass fuels	Hungary	Biomass fraction of wastes and residues from forestry and forest-based industries	12,065

Other biomass fuels	Hungary	Forest biomass	15,280
Other biomass fuels	Indonesia	Biomass fraction of industrial wastes	1,872
Other biomass fuels	Indonesia	Other waste/residue from biomass	4,141
Other biomass fuels	Ireland	Biomass fraction of industrial wastes	98,634
Other biomass fuels	Ireland	Other non-food cellulosic material	1,500
Other biomass fuels	Ireland	Other waste/residue from biomass	15,000
Other biomass fuels	Italy	Animal manure and sewage sludge	1,258
Other biomass fuels	Italy	Biomass fraction of industrial wastes	12,892
Other biomass fuels	Italy	Other waste/residue from biomass	27,374
Other biomass fuels	Latvia	Other non-food cellulosic material	2,170
Other biomass fuels	Lithuania	Biomass fraction of wastes and residues from forestry and forest-based industries	46,884
Other biomass fuels	Lithuania	Other non-food cellulosic material	6,057
Other biomass fuels	Lithuania	Other waste/residue from biomass	53,945
Other biomass fuels	Malaysia	Other non-food cellulosic material	54,150
Other biomass fuels	Netherlands	Biomass fraction of wastes and residues from forestry and forest-based industries	23,741
Other biomass fuels	Netherlands	Other waste/residue from biomass	8,579
Other biomass fuels	Netherlands	Waste Wood (post consumer)	14,620
Other biomass fuels	Nigeria	Other non-food cellulosic material	3,639
Other biomass fuels	Nigeria	Other waste/residue from biomass	1,327
Other biomass fuels	Poland	Biomass fraction of industrial wastes	1,843,625
Other biomass fuels	Poland	Biomass fraction of wastes and residues from forestry and forest-based industries	22,759
Other biomass fuels	Poland	Corn	18,874
Other biomass fuels	Poland	Forest biomass	98,793

Other biomass fuels	Poland	Other cereals	331
Other biomass fuels	Poland	Other non-food cellulosic material	38,965
Other biomass fuels	Poland	Other waste/residue from biomass	3,190
Other biomass fuels	Poland	Waste Wood (post consumer)	2
Other biomass fuels	Portugal	Biomass fraction of wastes and residues from forestry and forest-based industries	43,190
Other biomass fuels	Portugal	Other non-food cellulosic material	45,154
Other biomass fuels	Portugal	Other waste/residue from biomass	60,587
Other biomass fuels	Romania	Biomass fraction of industrial wastes	276,692
Other biomass fuels	Romania	Biomass fraction of wastes and residues from forestry and forest-based industries	1,690
Other biomass fuels	Romania	Other non-food cellulosic material	1,062
Other biomass fuels	Romania	Other waste/residue from biomass	250
Other biomass fuels	Sierra Leone	Other non-food cellulosic material	1,848
Other biomass fuels	Sierra Leone	Other waste/residue from biomass	1,835
Other biomass fuels	Slovakia	Animal manure and sewage sludge	13,160
Other biomass fuels	Slovakia	Biomass fraction of industrial wastes	134,706
Other biomass fuels	Slovakia	Other waste/residue from biomass	39,477
Other biomass fuels	Slovenia	Animal manure and sewage sludge	20,518
Other biomass fuels	Slovenia	Biomass fraction of industrial wastes	8,200
Other biomass fuels	Slovenia	Biomass fraction of wastes and residues from forestry and forest-based industries	8,951
Other biomass fuels	Slovenia	Forest biomass	2,455
Other biomass fuels	Slovenia	Other waste/residue from biomass	1,399
Other biomass fuels	Slovenia	Waste Wood (post consumer)	67
Other biomass fuels	Spain	Animal manure and sewage sludge	1,402

Other biomass fuels	Spain	Biomass fraction of industrial wastes	36,933
Other biomass fuels	Spain	Biomass fraction of wastes and residues from forestry and forest-based industries	1,806,947
Other biomass fuels	Spain	Biowaste (e.g. food waste)	8,781
Other biomass fuels	Spain	Forest biomass	12,749
Other biomass fuels	Spain	Other non-food cellulosic material	749,619
Other biomass fuels	Spain	Other waste/residue from biomass	2,550,496
Other biomass fuels	Spain	Waste Wood (post consumer)	1,792
Other biomass fuels	Switzerland	Biomass fraction of wastes and residues from forestry and forest-based industries	526
Other biomass fuels	Switzerland	Waste Wood (post consumer)	6,061
Other biomass fuels	Ukraine	Biomass fraction of industrial wastes	2,760
Other biomass fuels	Ukraine	Other non-food cellulosic material	1,579
Other biomass fuels	United Kingdom	Forest biomass	32,337
Other biomass fuels	USA	Other waste/residue from biomass	47
Raw material(Feedstock)	Austria	Animal manure and sewage sludge	13,033
Raw material(Feedstock)	Austria	Corn	5,292
Raw material(Feedstock)	Austria	Other cereals	439
Raw material(Feedstock)	Austria	Other non-food cellulosic material	3,008
Raw material(Feedstock)	Austria	Other waste/residue from biomass	19,655
Raw material(Feedstock)	Austria	Wheat	143
Raw material(Feedstock)	Belgium	Animal manure and sewage sludge	15,111
Raw material(Feedstock)	Belgium	Corn	9,624
Raw material(Feedstock)	Czech Republic	Animal manure and sewage sludge	4,834
Raw material(Feedstock)	Czech Republic	Biomass fraction of wastes and residues from forestry and forest-based industries	5,599

Raw material(Feedstock)	Czech Republic	Corn	21,100
Raw material(Feedstock)	Czech Republic	Other cereals	3,244
Raw material(Feedstock)	Czech Republic	Other feedstock	6,029
Raw material(Feedstock)	Czech Republic	Other non-food cellulosic material	697
Raw material(Feedstock)	Denmark	Animal manure and sewage sludge	1,800
Raw material(Feedstock)	Denmark	Corn	16,032
Raw material(Feedstock)	Denmark	Other non-food cellulosic material	1,288
Raw material(Feedstock)	Germany	Animal manure and sewage sludge	5,791,741
Raw material(Feedstock)	Germany	Biomass fraction of wastes and residues from forestry and forest-based industries	12,517
Raw material(Feedstock)	Germany	Biowaste (e.g. food waste)	244,258
Raw material(Feedstock)	Germany	Corn	6,032,030
Raw material(Feedstock)	Germany	Other cereals	462,969
Raw material(Feedstock)	Germany	Other feedstock	840,589
Raw material(Feedstock)	Germany	Other non-food cellulosic material	702,675
Raw material(Feedstock)	Germany	Other waste/residue from biomass	321,504
Raw material(Feedstock)	Germany	Wheat	37,773
Raw material(Feedstock)	Luxembourg	Corn	1,602
Raw material(Feedstock)	Netherlands	Animal manure and sewage sludge	49,622
Raw material(Feedstock)	Poland	Animal manure and sewage sludge	223
Raw material(Feedstock)	Poland	Other waste/residue from biomass	11,716
Raw material(Feedstock)	Sweden	Other feedstock	3,921
Shredded material	Austria	Biomass fraction of industrial wastes	10,157
Shredded material	Austria	Biomass fraction of wastes and residues from forestry and forest-based industries	42,426

Shredded material	Austria	Forest biomass	4,362
Shredded material	Austria	Other waste/residue from biomass	84,599
Shredded material	Austria	Waste Wood (post consumer)	57,875
Shredded material	Belgium	Biomass fraction of industrial wastes	23,540
Shredded material	Belgium	Biomass fraction of wastes and residues from forestry and forest-based industries	18,105
Shredded material	Croatia	Biomass fraction of industrial wastes	17,215
Shredded material	Croatia	Biomass fraction of wastes and residues from forestry and forest-based industries	1,131
Shredded material	Croatia	Forest biomass	1,493
Shredded material	Croatia	Waste Wood (post consumer)	5,464
Shredded material	Czech Republic	Biomass fraction of industrial wastes	48,592
Shredded material	Czech Republic	Biomass fraction of wastes and residues from forestry and forest-based industries	2,192
Shredded material	Czech Republic	Other feedstock	4,158
Shredded material	Denmark	Biomass fraction of wastes and residues from forestry and forest-based industries	2,926
Shredded material	Denmark	Waste Wood (post consumer)	13,024
Shredded material	France	Biomass fraction of wastes and residues from forestry and forest-based industries	2,873
Shredded material	France	Forest biomass	10,008
Shredded material	France	Other waste/residue from biomass	373
Shredded material	France	Waste Wood (post consumer)	661
Shredded material	Germany	Biomass fraction of industrial wastes	100,309
Shredded material	Germany	Biomass fraction of wastes and residues from forestry and forest-based industries	650,493
Shredded material	Germany	Biowaste (e.g. food waste)	5,507
Shredded material	Germany	Corn	17,602
Shredded material	Germany	Forest biomass	3,153

Shredded material	Germany	Other feedstock	661
Shredded material	Germany	Other non-food cellulosic material	3,349
Shredded material	Germany	Other waste/residue from biomass	55,090
Shredded material	Germany	Waste Wood (post consumer)	451,478
Shredded material	Hungary	Biomass fraction of wastes and residues from forestry and forest-based industries	6,312
Shredded material	Ireland	Biomass fraction of industrial wastes	44,314
Shredded material	Ireland	Biomass fraction of wastes and residues from forestry and forest-based industries	7,353
Shredded material	Ireland	Waste Wood (post consumer)	22,139
Shredded material	Italy	Other waste/residue from biomass	3,912
Shredded material	Italy	Waste Wood (post consumer)	2,148
Shredded material	Luxembourg	Biomass fraction of industrial wastes	484,706
Shredded material	Luxembourg	Biomass fraction of wastes and residues from forestry and forest-based industries	91
Shredded material	Luxembourg	Waste Wood (post consumer)	6,816
Shredded material	Netherlands	Biomass fraction of wastes and residues from forestry and forest-based industries	51
Shredded material	Netherlands	Waste Wood (post consumer)	5,156
Shredded material	Norway	Biomass fraction of wastes and residues from forestry and forest-based industries	991
Shredded material	Poland	Animal manure and sewage sludge	4,088
Shredded material	Poland	Biomass fraction of industrial wastes	265,675
Shredded material	Poland	Biomass fraction of wastes and residues from forestry and forest-based industries	66,953
Shredded material	Poland	Forest biomass	9,147
Shredded material	Poland	Other non-food cellulosic material	3,020
Shredded material	Poland	Other waste/residue from biomass	26,545
Shredded material	Poland	Waste Wood (post consumer)	4,800

Shredded material	Portugal	Biomass fraction of industrial wastes	22,234
Shredded material	Portugal	Biomass fraction of wastes and residues from forestry and forest-based industries	15,457
Shredded material	Portugal	Forest biomass	11,612
Shredded material	Slovakia	Biomass fraction of industrial wastes	191,732
Shredded material	Slovakia	Biomass fraction of wastes and residues from forestry and forest-based industries	13,422
Shredded material	Slovenia	Biomass fraction of wastes and residues from forestry and forest-based industries	15,177
Shredded material	Slovenia	Other waste/residue from biomass	4,068
Shredded material	Slovenia	Waste Wood (post consumer)	1,680
Shredded material	Spain	Biomass fraction of industrial wastes	119,681
Shredded material	Spain	Biomass fraction of wastes and residues from forestry and forest-based industries	305,508
Shredded material	Spain	Biowaste (e.g. food waste)	1,792
Shredded material	Spain	Forest biomass	81,423
Shredded material	Spain	Other non-food cellulosic material	17,536
Shredded material	Spain	Other waste/residue from biomass	21,135
Wood briquettes	France	Forest biomass	3,622
Wood briquettes	Spain	Forest biomass	3,310
Wood chips	Austria	Biomass fraction of industrial wastes	407,255
Wood chips	Austria	Biomass fraction of wastes and residues from forestry and forest-based industries	695,762
Wood chips	Austria	Forest biomass	1,061,362
Wood chips	Austria	Other non-food cellulosic material	716
Wood chips	Austria	Other waste/residue from biomass	99,585
Wood chips	Austria	Waste Wood (post consumer)	104,231
Wood chips	Belgium	Biomass fraction of wastes and residues from forestry and forest-based industries	23,174

Wood chips	Belgium	Forest biomass	30,392
Wood chips	Belgium	Waste Wood (post consumer)	9,838
Wood chips	Croatia	Biomass fraction of industrial wastes	66,236
Wood chips	Croatia	Biomass fraction of wastes and residues from forestry and forest-based industries	34,320
Wood chips	Croatia	Forest biomass	67,855
Wood chips	Czech Republic	Biomass fraction of industrial wastes	302,466
Wood chips	Czech Republic	Biomass fraction of wastes and residues from forestry and forest-based industries	573,193
Wood chips	Czech Republic	Biowaste (e.g. food waste)	512
Wood chips	Czech Republic	Forest biomass	135,013
Wood chips	Czech Republic	Other waste/residue from biomass	18,362
Wood chips	Czech Republic	Waste Wood (post consumer)	19,147
Wood chips	Denmark	Waste Wood (post consumer)	16,448
Wood chips	Estonia	Biomass fraction of industrial wastes	2,692
Wood chips	Estonia	Biomass fraction of wastes and residues from forestry and forest-based industries	33,905
Wood chips	France	Biomass fraction of industrial wastes	27,907
Wood chips	France	Biomass fraction of wastes and residues from forestry and forest-based industries	37,643
Wood chips	France	Forest biomass	802,372
Wood chips	France	Other non-food cellulosic material	947
Wood chips	France	Other waste/residue from biomass	6,976
Wood chips	France	Waste Wood (post consumer)	5,935
Wood chips	Germany	Biomass fraction of industrial wastes	617,272
Wood chips	Germany	Biomass fraction of wastes and residues from forestry and forest-based industries	1,272,193
Wood chips	Germany	Forest biomass	2,789,015

Wood chips	Germany	Other non-food cellulosic material	26,070
Wood chips	Germany	Other waste/residue from biomass	17,934
Wood chips	Germany	Waste Wood (post consumer)	1,680,935
Wood chips	Hungary	Biomass fraction of industrial wastes	12,769
Wood chips	Hungary	Biomass fraction of wastes and residues from forestry and forest-based industries	136,920
Wood chips	Hungary	Forest biomass	186,742
Wood chips	Hungary	Other non-food cellulosic material	18,708
Wood chips	Hungary	Other waste/residue from biomass	1,140
Wood chips	Ireland	Biomass fraction of industrial wastes	11,856
Wood chips	Ireland	Forest biomass	23,146
Wood chips	Ireland	Waste Wood (post consumer)	3,149
Wood chips	Italy	Biomass fraction of industrial wastes	6,820
Wood chips	Italy	Biomass fraction of wastes and residues from forestry and forest-based industries	950
Wood chips	Italy	Forest biomass	1,095
Wood chips	Italy	Waste Wood (post consumer)	6,609
Wood chips	Latvia	Biomass fraction of industrial wastes	49,457
Wood chips	Latvia	Biomass fraction of wastes and residues from forestry and forest-based industries	365,580
Wood chips	Latvia	Forest biomass	22,147
Wood chips	Latvia	Other non-food cellulosic material	2,112
Wood chips	Latvia	Other waste/residue from biomass	2,025
Wood chips	Lithuania	Biomass fraction of industrial wastes	196,307
Wood chips	Lithuania	Biomass fraction of wastes and residues from forestry and forest-based industries	211,720
Wood chips	Lithuania	Forest biomass	67,597

Wood chips	Lithuania	Other waste/residue from biomass	384
Wood chips	Luxembourg	Biomass fraction of wastes and residues from forestry and forest-based industries	191
Wood chips	Netherlands	Biomass fraction of wastes and residues from forestry and forest-based industries	186
Wood chips	Netherlands	Waste Wood (post consumer)	255,087
Wood chips	Poland	Biomass fraction of industrial wastes	961,132
Wood chips	Poland	Biomass fraction of wastes and residues from forestry and forest-based industries	1,885,709
Wood chips	Poland	Forest biomass	268,759
Wood chips	Poland	Other non-food cellulosic material	91,554
Wood chips	Poland	Other waste/residue from biomass	110,385
Wood chips	Poland	Waste Wood (post consumer)	5,423
Wood chips	Portugal	Biomass fraction of industrial wastes	847
Wood chips	Portugal	Biomass fraction of wastes and residues from forestry and forest-based industries	126,565
Wood chips	Portugal	Forest biomass	68,456
Wood chips	Portugal	Other non-food cellulosic material	6,513
Wood chips	Portugal	Other waste/residue from biomass	1,034
Wood chips	Romania	Biomass fraction of industrial wastes	164,922
Wood chips	Romania	Biomass fraction of wastes and residues from forestry and forest-based industries	13,096
Wood chips	Romania	Forest biomass	991
Wood chips	Romania	Other non-food cellulosic material	4,010
Wood chips	Romania	Waste Wood (post consumer)	293
Wood chips	Slovakia	Biomass fraction of industrial wastes	110,966
Wood chips	Slovakia	Biomass fraction of wastes and residues from forestry and forest-based industries	174,682
Wood chips	Slovakia	Forest biomass	37,576

Wood chips	Slovakia	Other waste/residue from biomass	7,255
Wood chips	Slovakia	Waste Wood (post consumer)	745
Wood chips	Slovenia	Biomass fraction of industrial wastes	97,287
Wood chips	Slovenia	Biomass fraction of wastes and residues from forestry and forest-based industries	176,316
Wood chips	Slovenia	Forest biomass	316,412
Wood chips	Slovenia	Other waste/residue from biomass	3,043
Wood chips	Slovenia	Waste Wood (post consumer)	5,864
Wood chips	Spain	Biomass fraction of industrial wastes	197,440
Wood chips	Spain	Biomass fraction of wastes and residues from forestry and forest-based industries	1,531,109
Wood chips	Spain	Biowaste (e.g. food waste)	295
Wood chips	Spain	Forest biomass	411,926
Wood chips	Spain	Other non-food cellulosic material	122,654
Wood chips	Spain	Other waste/residue from biomass	242,558
Wood chips	Switzerland	Waste Wood (post consumer)	1,888
Wood pellets	Austria	Biomass fraction of industrial wastes	5,950
Wood pellets	Austria	Biomass fraction of wastes and residues from forestry and forest-based industries	5,704
Wood pellets	Belgium	Biomass fraction of industrial wastes	2,038
Wood pellets	Belgium	Forest biomass	30
Wood pellets	Czech Republic	Biomass fraction of industrial wastes	2,602
Wood pellets	Czech Republic	Other non-food cellulosic material	2,966
Wood pellets	Denmark	Other non-food cellulosic material	6,409
Wood pellets	France	Biomass fraction of industrial wastes	9,764
Wood pellets	France	Biomass fraction of wastes and residues from forestry and forest-based industries	651

Wood pellets	France	Forest biomass	566
Wood pellets	Germany	Animal manure and sewage sludge	1,857
Wood pellets	Germany	Biomass fraction of industrial wastes	44,238
Wood pellets	Germany	Biomass fraction of wastes and residues from forestry and forest-based industries	425
Wood pellets	Germany	Forest biomass	14,597
Wood pellets	Germany	Other non-food cellulosic material	25
Wood pellets	Germany	Waste Wood (post consumer)	2,413
Wood pellets	Hungary	Other non-food cellulosic material	3,200
Wood pellets	Hungary	Other waste/residue from biomass	1,309
Wood pellets	Kazakhstan	Other waste/residue from biomass	54,122
Wood pellets	Netherlands	Biomass fraction of industrial wastes	865
Wood pellets	Netherlands	Forest biomass	19,824
Wood pellets	Poland	Biomass fraction of industrial wastes	262,752
Wood pellets	Poland	Biomass fraction of wastes and residues from forestry and forest-based industries	17,012
Wood pellets	Poland	Forest biomass	1,313
Wood pellets	Poland	Other non-food cellulosic material	51,479
Wood pellets	Poland	Other waste/residue from biomass	23,357
Wood pellets	Portugal	Biomass fraction of industrial wastes	557
Wood pellets	Spain	Biomass fraction of industrial wastes	44,044
Wood pellets	Spain	Other waste/residue from biomass	15,696
Wood pellets	Ukraine	Biomass fraction of industrial wastes	4,811
Wood pellets	Ukraine	Forest biomass	1,867
Wood pellets	Ukraine	Other non-food cellulosic material	25,248

Wood pellets	Ukraine	Other waste/residue from biomass	29,850
Wood pellets	USA	Biomass fraction of industrial wastes	20,856
Wood pellets	USA	Biomass fraction of wastes and residues from forestry and forest-based industries	2,866

### Disclaimer

The quantitative data presented in this Activity Report are based exclusively on figures provided by economic operators until April 30<sup>th</sup>, 2025 for 2024. While comprehensive efforts have been made to verify and ascertain the correctness of the information provided, SURE cannot guarantee its absolute accuracy or completeness as the information is only verified by the certification bodies during the subsequent re-certification audits. Therefore, SURE expressly disclaim any liability arising from potential inaccuracies, errors, or omissions in the data published herein.