



# **Guidance for the REDcert Compliance Statement (RCS)**

**Version EU 01**

## Table of contents

<b>1</b>	<b>Introduction</b> .....	<b>3</b>
<b>2</b>	<b>Scope of the document</b> .....	<b>4</b>
<b>3</b>	<b>Requirement for the issuance of the RCS</b> .....	<b>5</b>
3.1	General requirements.....	5
3.2	Requirements for the content of the RCS .....	6
3.3	Documentation requirements .....	8
<b>4</b>	<b>Requirement for certification</b> .....	<b>8</b>

# 1 Introduction

The revised Directive (EU) 2018/2001 (RED III) sets out comprehensive sustainability requirements for renewable fuels – biofuels, bioliquids, biomass-fuels, renewable fuels of non-biological origin (RFNBO) and recycled carbon fuels (RCF). In order for the quantities of these fuels to be counted towards Member States' transport targets, their production must comply with the requirements of RED III. Compliance with these requirements can be independently confirmed by economic operators (scheme participants) through certification in the REDcert-EU system. This enables certified companies to issue proof of sustainability (PoS) that can be submitted as evidence to the competent authority of the Member State in which the fuel is counted towards the targets.

In addition to accounting in the transport sector, proof of compliance with sustainability requirements is also relevant in other regulatory frameworks. For example, Regulation (EU) 2023/2405 ('ReFuelEU Aviation') and Regulation (EU) 2023/1805 ('FuelEU Maritime') refer to the criteria described in RED III. This results in aircraft operators and shipping companies (hereinafter: fuel users) being required to demonstrate to the national authority or its verifier the use of compliant renewable or recycled carbon fuels.

As the crediting via PoS is typically done at the level of the fuel supplier (so-called distributor) and thus before actual use, the PoS is usually not available to fuel users as evidence. The resulting gap in documentation and traceability is to be filled in the future by the Union database (UDB). As long as their mandatory use does not yet apply, a practical interim solution is required, which enables economic operators to issue evidence of the RED-compliance. Therefore, REDcert provides participants of the REDcert-EU scheme with a template for issuing the REDcert Compliance Statement (RCS). The requirements for the issuance and the handling of the RCS are described in detail below.

## 2 Scope of the document

This guidance complements the REDcert-EU scheme with the aim of enabling verification between fuel suppliers and fuel users. The document does not constitute an independent certification scheme but is a voluntary part of REDcert-EU and does not have a legally binding character. It does not constitute a claim for official recognition nor a guarantee for the legal admissibility or completeness of the procedures described herein; the determination of the admissibility of taking the RCS into account is the sole responsibility of the competent authorities or bodies.

If the demonstration between fuel suppliers and users in a Member State is already defined by a national procedure or if the UDB allows the required documentation, this guidance loses its applicability in the respective Member State or for the entire European Union.

The guidance and its requirements are addressed to fuel suppliers who are required to provide evidence confirming compliance with the RED requirements due to evidence obligations of downstream economic operators. This is without prejudice to the essential requirements of the REDcert-EU system. This applies in particular, but not exclusively, to the *Scheme principles for mass balance*. The RCS issued by certified economic operators under the REDcert-EU scheme shall constitute evidence of compliance with the sustainability and greenhouse gas saving requirements for renewable fuels or recycled carbon fuels set out in RED III. The evidence shall not serve as evidence of compliance with the requirements set out in Regulation (EU) 2023/2405, Regulation (EU) 2023/1805 or other Directives or Regulations that refer to RED III in the case of sustainability criteria and greenhouse gas savings.

## 3 Requirement for the issuance of the RCS

### 3.1 General requirements

While the PoS is issued by the economic operator producing the final fuel in the value chain (so-called last interface), the RCS can only be issued by the economic operator at whose level the PoS is submitted to the national authority (fuel supplier). In specific cases, the economic operator can be both the last interface and the fuel supplier. The requirements for issuing the RCS shall apply accordingly.

When issuing the RCS for a fuel supply, the fuel supplier shall ensure that the PoS issued for the fuel supply has been transferred to the competent national authority and is therefore no longer available for downstream demonstration, or that the PoS is identified in an internal procedure in irreversible form for submission to the competent national authority and its content is no longer editable.

Fuel suppliers may only submit the RCS to the fuel user as an accompanying document, either directly or via intermediaries that are certified under a voluntary scheme recognized by the European Commission that has defined a robust methodology for issuing and transferring RED-compliance proofs. The transmission of the RCS to the intermediary or the fuel user is only permitted if a corresponding physical movement of goods takes place (see *Scheme principles for mass balance*). It is not possible to trade the RCS separately from the flow of goods.

The RCS shall be issued no later than 30 days after the PoS has been surrendered to the national authority.<sup>1</sup> If the fuel supplier combines several PoS in one RCS, this is possible provided that the sustainability characteristics and the greenhouse gas savings potential shown in the PoS are identical. In such a case, the PoS first transferred determines the reference point for determining the 30 days. It must be ensured that the RCS is not resubmitted to a national authority for credit against the national targets and that the risk of potential double counting can therefore be ruled out.

---

<sup>1</sup> In the event that an economic operator has entered into a trade requesting an RCS prior to the publication of this guidance on the official REDcert website, the RCS may also be issued after the 30 days have elapsed. This applies provided that the certification body and REDcert agree to the subsequent issuance of the RCS.

## 3.2 Requirements for the content of the RCS

The RCS issued by the fuel supplier shall have a clear reference to the PoS on the basis of which it is issued and shall reflect the content of the PoS. To do so, the RCS must contain at least the following information:

### Document traceability information

- Unique identification number of the RCS
- Reference to the identification number of the underlying PoS, its purpose and, where applicable, date of submission to the national authority
- Date of issuance of the RCS
- Confirmation that the underlying PoS has been submitted to the national authority; or
- Confirmation that the underlying POS will be submitted to the national authority for the purpose of crediting

### Information on fuel traceability

- Name and address of fuel supplier
- Name and address of the fuel buyer
- Date of (physical) loading
- Place of (physical) loading or logistics facility or entry point within the distribution infrastructure
- Place of (physical) delivery or logistics facility or starting point within the distribution infrastructure
- Volume or weight (at a certain density) and energy content

### Information on sustainability characteristics

- Reference to the REDcert-EU scheme
- Identification number of the REDcert-EU certificate valid for the issuance of the RCS
- Type of fuel
- Date of commissioning of the fuel production plant
- Country of fuel production
- Name of raw material

- Country of origin of the raw material
- Statements of compliance of the raw material with the criteria set out in Article 29(2) to (7) of the revised Directive (EU) 2018/2001 (statements of compliance of the raw material with paragraphs 6 and 7 of Article 29 by a participant in the REDcert-EU system is only possible if confirmed in advance by another recognised certification scheme (e.g. SURE-EU))
- GHG emissions data
- Information on any support/subsidies and the type of support in the field of renewable energy

In addition, additional information required by the fuel user's obligation to provide evidence may be provided. However, these can only be additional traceability information and not additional sustainability characteristics that are not covered by the scope of the certification. Additional traceability information can be, for example, a reference to the bunker delivery note (BDN) or the number of the ship according to the International Maritime Organization (IMO), which receives the fuel delivery.

If the fuel supplier receives a fuel delivery from an upstream economic operator for which there is an RCS or a comparable statement of compliance but no PoS, the fuel supplier shall obtain confirmation from the upstream economic operator that the PoS has been submitted to the national authority for crediting or that the submission is ensured. The RCS obtained may be transferred by the fuel supplier to downstream companies in accordance with the requirements of the *Scheme principles for mass balancing*. This includes, among other things, the issuance of partial proofs, provided that the partial proof contains a clear reference to the original PoS and RCS. In addition, the fuel supplier must ensure that the sum of the fuel quantities shown in the partial proofs does not exceed the sum of the fuel quantity of the original RCS and thus of the original PoS. The combination of several partial RCS is not permitted, even if the underlying sustainability characteristics and the greenhouse gas savings potential are identical.

### 3.3 Documentation requirements

In addition to the applicable requirements of the REDcert-EU scheme, fuel suppliers must include the procedure for issuing the RCS in the description of their processes. In particular, it must be transparent how the processes ensure that an RCS can only be issued or forwarded if the PoS underlying the intended use is ensured.

If the fuel supplier issues an RCS for a delivery, this delivery must be marked separately in the outgoing goods of the mass balance. The same applies if the fuel supplier receives a fuel delivery for which only an RCS is available.

If an RCS is issued, the fuel supplier must keep a copy of the proof and make it directly available to the certification body upon request.

## 4 Requirement for certification

Each economic operator issuing or receiving and distributing an RCS must be individually certified under the REDcert-EU scheme. For this purpose, the appropriate scope must be audited by the audit staff and confirmed by the certification body. For the handling of the RCS, REDcert provides for the following scope:

➤ 510 – Fuel supplier / fuel trader (RCS)

The scope includes the issuance of the RCS in accordance with the additional requirement set out in this document, as well as the handling of the receipt of an RCS or comparable evidence and its forwarding.

The accuracy of the information on the RCS shall be verified by the certification body. As part of the audit of a *510 – fuel supplier / fuel trader (RCS)*, the auditor must check not only, but in particular, the following requirements:

- the process to ensure that the RCS can only be issued or passed on if the purpose of the underlying PoS is ensured;
- ensuring that the RCS is issued directly to the user or to an appropriately certified intermediary;
- the completeness of the information listed on the RCS and its comprehensible connection to the PoS; and

- the conformity of the procedure with the requirements set out in the *Scheme principles for mass balance*.

**Publication information**

REDcert GmbH

Schwertberger Straße 16

53177 Bonn

Germany

+49 (0) 228 3506 200

[www.redcert.org](http://www.redcert.org)