



# **Scheme principles for neutral inspections**

**Version EU 08**

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## Table of contents

<b>1</b>	<b>Introduction .....</b>	<b>6</b>
<b>2</b>	<b>Definitions .....</b>	<b>6</b>
<b>3</b>	<b>Inspection system .....</b>	<b>7</b>
<b>3.1</b>	<b>Types of audits .....</b>	<b>8</b>
3.1.1	Scheme audits .....	8
3.1.2	Special audit.....	11
<b>3.2</b>	<b>Audit methods .....</b>	<b>12</b>
<b>3.3</b>	<b>Process and duration of audits .....</b>	<b>13</b>
<b>3.4</b>	<b>Audit intervals .....</b>	<b>15</b>
<b>3.5</b>	<b>Evaluation of the audit results .....</b>	<b>16</b>
3.5.1	Definitions of "non-conformities" .....	18
3.5.2	Corrective measures, time periods and impacts .....	20
<b>3.6</b>	<b>Reporting.....</b>	<b>22</b>
<b>3.7</b>	<b>Document check .....</b>	<b>23</b>
<b>3.8</b>	<b>Risk management .....</b>	<b>26</b>
<b>3.9</b>	<b>Issuing and withdrawing certificates.....</b>	<b>26</b>
<b>4</b>	<b>Scope of audit/certification .....</b>	<b>27</b>
<b>4.1</b>	<b>Audits and certification of dependent/non-autonomous storage facilities and logistic services (upstream operations) .....</b>	<b>28</b>
4.1.1	Scope and process of sample inspections for storage facilities.....	29
4.1.2	Threshold for a failed inspection of storage facilities or operating sites .....	29
4.1.3	Audit requirements on logistics facilities .....	30
4.1.4	Audit requirements on dependent logistics services .....	30
<b>5</b>	<b>Group certification .....</b>	<b>31</b>
<b>5.1</b>	<b>General requirements .....</b>	<b>31</b>
<b>5.2</b>	<b>Requirements of group management.....</b>	<b>32</b>
5.2.1	Central office/group manager .....	32

5.2.2	Group member .....	34
<b>5.3</b>	<b>Self-declaration .....</b>	<b>34</b>
5.3.1	Agricultural biomass producers .....	34
5.3.2	Waste and residue producers .....	35
<b>5.4</b>	<b>Scope and process of sample inspections .....</b>	<b>35</b>
5.4.1	Sample size .....	35
5.4.2	Selection of the samples .....	37
<b>5.5</b>	<b>Sample inspections .....</b>	<b>38</b>
5.5.1	Agriculture .....	39
5.5.2	Waste and residue producers .....	39
<b>5.6</b>	<b>Thresholds for failed sample inspections .....</b>	<b>42</b>
<b>5.7</b>	<b>Issue of inspection certificates .....</b>	<b>43</b>
<b>6</b>	<b>Requirements and responsibilities of certification bodies .....</b>	<b>44</b>
<b>6.1</b>	<b>Requirements for certification bodies .....</b>	<b>44</b>
6.1.1	Recognition by a national authority or accreditation body .....	44
6.1.2	Registration by REDcert and contract conclusion .....	45
6.1.3	Quality management (QM) system and documentation .....	45
6.1.4	Independence and impartiality .....	45
6.1.5	Technical and staffing requirements .....	46
6.1.6	Principle of peer review .....	47
6.1.7	Handling complaints and claims .....	47
6.1.8	Selection and appointment of an audit team .....	47
6.1.9	Rotation of auditors .....	47
<b>6.2</b>	<b>Invalidating approval .....</b>	<b>48</b>
<b>6.3</b>	<b>Responsibilities of certification bodies .....</b>	<b>48</b>
6.3.1	Risk management .....	48
6.3.2	Performing audits/inspections and issuing certificates and inspection certificates .....	48

6.3.3	Lists of interfaces .....	50
6.3.4	Storing and handling information .....	50
6.3.5	External and internal training for auditors .....	50
6.3.6	Participation in monitoring activities of the member states and the European Commission .....	51
<b>7</b>	<b>Requirements of REDcert auditors .....</b>	<b>52</b>
<b>7.1</b>	<b>Training and qualification .....</b>	<b>52</b>
7.1.1	Land-use criteria .....	52
7.1.2	Knowledge of GHG balancing .....	53
7.1.3	Inspections of farms .....	53
7.1.4	Waste and residues .....	55
7.1.5	Inspection of interfaces, warehouses and suppliers.....	56
7.1.6	Group certification.....	56
<b>7.2</b>	<b>Required knowledge, professional and practical experience as an auditor</b>	<b>56</b>
7.2.1	Training and performance review of certification body staff .....	57
7.2.2	Initial training before starting work .....	57
7.2.3	Further training to maintain a high level of expertise .....	58
7.2.4	Carrying out initial exams .....	59
7.2.5	Monitoring the exam process .....	60
<b>8</b>	<b>Registration process .....</b>	<b>60</b>
<b>8.1</b>	<b>Relevant documents .....</b>	<b>62</b>
8.1.1	Registering a scheme partner .....	62
8.1.2	Registering a certification body .....	62
8.1.3	Registering an auditor.....	63
<b>9</b>	<b>REDcert integrity and quality assurance measures .....</b>	<b>64</b>
<b>10</b>	<b>Relevant documents .....</b>	<b>65</b>
<b>11</b>	<b>Revision information for Version EU 07 .....</b>	<b>66</b>

## 1 Introduction

Economic operators who want to

- provide proof that the production of biofuels, bioliquids and biomass fuels is in accordance with the requirements of Article 29 (2) to (7) and (10) of Revised Directive (EU) 2018/2001, or
- provide proof that the production of renewable fuels of non-biological origin is in accordance with Delegated Regulation (EU) 2023/1184 and Delegated Regulation (EU) 2013/1185 and fulfils the requirements of Article 29a of Revised Directive (EU) 2018/2001, or
- provide proof that the production of recycled carbon fuels is in accordance with Delegated Regulation (EU) 2013/1185 and fulfils the requirements set out in Article 29a of Revised Directive (EU) 2018/2001

must supply reliable information demonstrating compliance with these sustainability criteria.

The information provided must be confirmed by an appropriate and independent (neutral) inspection.

This inspection covers not only the question of whether the **sustainability criteria** have been complied with and adhered to, but also whether the documents used by the economic operators are accurate, reliable and fraud-proof. The frequency and method of documentation and the reliability of the data must also be assessed.

The **REDcert scheme** is a certification scheme that provides proof of compliance with the sustainability criteria in accordance with the requirements of the Revised Directive EU/2018/2001 through independent audits. These scheme principles explain the prerequisites for and requirements of neutral inspections and describe how they are conducted in detail.

## 2 Definitions

In order to establish a common understanding of the terms and definitions used in these scheme principles, please refer to the REDcert-EU document "*Definitions in the REDcert-EU scheme*".

### 3 Inspection system

To ensure the sustainable production of renewable fuels and recycled carbon fuels (RCF), the participants in the value chain are subject to neutral **inspections**. Certification bodies approved by and registered with REDcert and accredited by national authorities (see section 6.1.1) check compliance with the scheme requirements along the entire production, processing and supply chain by conducting what are known as scheme audits of the respective economic operators. The audit result is documented in the scope-specific checklist (**audit report**). The audit report is approved by the certification body and entered in the REDcert database.

Economic operators along the **entire biomass chain** who want to be certified under the REDcert certification scheme must register with REDcert. This must be done online at [www.redcert.eu](http://www.redcert.eu). The individual steps for joining the scheme are described in detail in the REDcert document "Scope and basic scheme requirements".

Economic operators choose one of the certification bodies approved by REDcert to conduct neutral inspections. You can find a **list of the approved certification bodies** and their contact information on REDcert's website ([www.redcert.org](http://www.redcert.org)). A list of certification bodies that are **no longer** entitled to conduct independent auditing under the REDcert-EU scheme is also published on the website for at least 12 months after the last audit ([www.redcert.org/en/redcert-systems/certification-bodies/non-approved-certification-bodies](http://www.redcert.org/en/redcert-systems/certification-bodies/non-approved-certification-bodies)). After a contract is signed between the economic operator and the certification body (commissioning the certification), the certification body selected sends REDcert the **legally binding declaration** about performing audits and carries out these audits.

The economic operator to be certified must become thoroughly familiar with the REDcert requirements prior to the audit. The **scheme principles** are available for downloading from REDcert's website at [www.redcert.org](http://www.redcert.org).

The **audit and certification process** comprises the following steps:

1. The commissioned certification body conducts the **initial audit** of the site (on-site audit and evaluation of the scheme requirements).
2. The certification body writes the **audit report**, submits it for peer review and saves it in the REDcert database.
3. REDcert records the audit report in the database

4. The certification body issues the **certificate** (certificate and/or inspection certificate) and enters the certificate data in the **REDcert database** ([www.redcert.eu](http://www.redcert.eu)). All certificates and inspection certificates are published at [www.redcert.eu/ZertifikateDatenAnzeige](http://www.redcert.eu/ZertifikateDatenAnzeige).

**The economic operator may only start supplying sustainable biomass, bioliquids and/or biomass fuels once these steps have been completed.**

5. The certification body carries out **surveillance audits** as required by these scheme principles.
6. **Re-certification audit** within 12 months, etc.

## 3.1 Types of audits

There are two kinds of neutral inspections: **scheme audits** and **special audits**.

### 3.1.1 Scheme audits

During a scheme audit, compliance with scheme requirements is checked using the REDcert scope-specific checklists. A scheme audit consists of the initial audit, the re-certification audit, the surveillance audit and the follow-up audit.

#### **Initial audit:**

An initial audit (**prior to approval for participation in the REDcert-EU scheme**) is a fixed component of the scheme and mandatory.

The initial audit is the first verification and assessment of compliance with the REDcert requirements prior to certification of an economic operator. During the initial audit, the processes are checked for coherence, and the documentation checked to ensure that they are accurate, complete, consistent and plausible. The **initial audit always takes place on site**.

The economic operator seeking an initial audit must provide the certification body/auditor with all relevant information in advance of the audit. This concerns the mass balance and – if applicable – also the audit reports from other voluntary certification schemes that the



economic operator has participated in within the last 5 years as well as information on any certificate suspensions or withdrawals during this period.

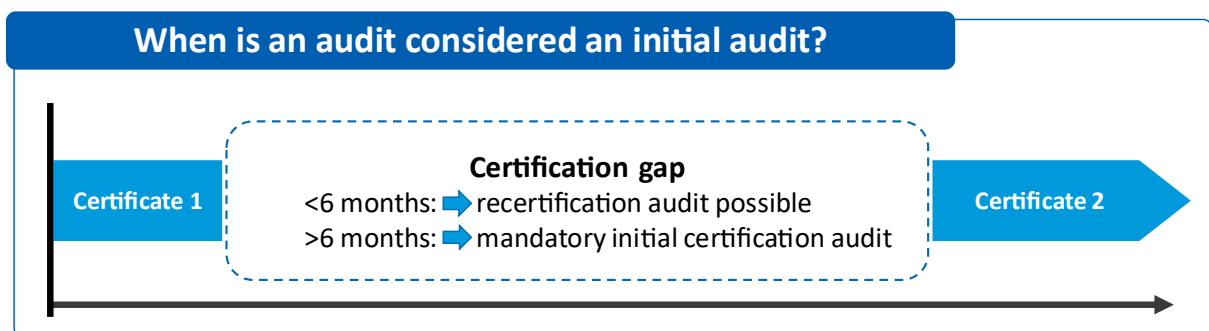
### Re-certification audit:

The re-certification audit is a complete scheme audit to check whether the operation still satisfies the scheme requirements and that agreed corrective measures have been implemented. Processes and documents are inspected retroactively, and random samples are checked. The re-certification audit and the subsequent certification decision is carried out before the existing certificate or inspection certificate expires to ensure that certification is continuous. Every operation bears sole responsibility for ensuring that the relevant deadlines are met.

Should a certificate gap occur for whatever reason, the following rule applies:

In the event of a certificate gap that is greater than 6 months, the certification body must conduct an initial audit with all the resulting consequences (e.g. remote audit not allowed, surveillance audit in the area of waste and residues).

In addition, auditors must retrospectively check for at least 12 months to what extent the handling of biomass was also in compliance with the regulations during the period not covered by a valid certificate (e.g. sustainable and non-sustainable biomass in mass balancing system).



**The re-certification of an existing scheme participant under a revised regulatory framework shall always be on-site and shall at least provide reasonable assurance<sup>1</sup> on the effectiveness of its internal processes (for different levels of assurance, see section 6.3.2).**

**Prior to re-certification**, the certification body must inform REDcert if non-conformities (major non-conformities) have previously been identified for an economic operator in the following areas:

- indicate the names of all schemes they participate in and
- make all relevant information, including the mass balance data and the auditing reports, available to the auditor, or
- to disclose whether they were found to be non-compliant.

#### **Surveillance audit:**

A scheme audit conducted during the period of validity of the REDcert certificate to assess whether the participant continuously meets the requirements for certification. In the REDcert-EU scheme, surveillance audits are conducted during the year ***in the area of waste and residues after initial certification***.

#### **Follow-up audit:**

A follow-up audit is required if major non-conformities related to the fulfilment of the REDcert requirements are found during the initial/re-certification audit that would prevent participation in the scheme or would result in the loss of the existing certification: The main priority of a follow-up audit; which must take place within 3 months after the previous audit; is to ensure that the agreed corrective measures have been implemented. **The operation may not supply products certified as sustainable in the period between the failed audit and the follow-up audit including a positive certification decision:**

If a follow-up audit has not been performed after three months, a complete initial audit is required.

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<sup>1</sup> A "limited assurance level" implies a reduction in risk to an acceptable level as the basis for a negative form of expression by the inspector such as "based on our assessment nothing has come to our attention to cause us to believe that there are errors in the evidence", whereas a "reasonable assurance level" implies a reduction in risk to an acceptably low level as the basis for a positive form of expression such as "based on our assessment, the evidence is free from material misstatement". (see ISEA 3000)

### 3.1.2 Special audit

Special audits may be mandated by REDcert in cases where a non-conformity is suspected or in the event of crises, incidents or for other reasons and/or also be carried out by REDcert: The **content of special audits** either corresponds to the content of scheme audits (in the sense of spot or shadow audits) or are carried out as a witness or office audit.

#### Shadow audit

A shadow audit is an **unannounced audit of a scheme participant**. This audit can either be targeted like a spot audit or it can be a comprehensive document review like a scheme audit.

#### Office audit:

During an **on-site** "office audit", the quality of selected certification processes as well as the certification processes in the certification body are reviewed, among other things, by **inspecting documents**.

#### Spot audit:

A spot audit is an audit announced **at short notice**. Spot audits usually focus on checking reports of non-scheme-compliant activities/conduct or selected sustainability criteria. This type of audit can be carried out both at a scheme participant and at a certification body.

In addition, special audits are also a quality assurance measure of the scheme operator. The objective facts are determined on-site in these audits. And the certification bodies and scheme partners to be inspected are also selected using objective criteria.

Quality criteria (e.g. review of the audits reports and analysis of the certification process as part of REDcert monitoring or on the basis of complaints or if external third parties have submitted complaints of possible non-conformities) as well as financial figures (e.g. number of certificates issued) are both included. In addition, special audits can also be initiated based on random selection, primarily by auditors and certification bodies. The special audits of scheme participants, auditors or certification bodies can be accompanied by REDcert auditors or conducted independently by individuals appointed by REDcert.

**Witness audit:**

A witness audit is when an auditor approved and registered in the REDcert scheme is **accompanied**. This includes observing the audit, which is carried out by one or more auditors from a REDcert certification body without interference or influence. Depending on what the objectives of the witness audit are, an entire scheme audit can be observed or only relevant parts thereof. The witness audit takes place **on site** at the premises of the certification body's customer (economic operator/scheme operator) to be certified.

### 3.2 Audit methods

To conduct the audit effectively and efficiently, the individual(s) managing the audit programme should select and determine the methods for the audit depending on the defined **audit objectives**, the defined **audit scope** and the defined **audit criteria**.

Audits can be carried out **on site, remotely or through a combination of both**. In the REDcert-EU scheme, verification of compliance with the requirements of the Revised Directive (EU) 2018/2001 is usually carried out on site.

The use of audit methods should be appropriate and balanced, considering the possibilities and limitations involved (**in accordance with ISO 19011**: Guide for auditing management systems).

**On-site audit:**

An on-site audit is carried out at the premises of an economic operator to be audited by a REDcert approved and registered auditor. Compliance with the requirements of the REDcert-EU scheme of these economic operators is verified, assessed and documented by the auditor not only by **checking the documentation**, but also by **personally inspecting the site** where activities relevant to the audit (scope) take place, as well as by **interviews with the individuals involved** or by other plausibility checks.

**Desk audit:**

A desk audit is an audit that does not take place on the premises of the economic operator to be audited.

In the case of a desk audit, **documents** within the scope of an audit are checked to ensure that they are complete, correct, consistent and up-to-date outside the location of the audited party. The audited party's compliance with the requirements of the REDcert-EU

scheme is verified on the basis of the **documentation**. This audit method is **possible** as long as

- the same depth of inspection can be guaranteed
- the security and confidentiality of electronic and electronically submitted information is guaranteed
- it is carried out by mutual consent between the auditor and the audited party

The information obtained is usually used to plan the on-site audit. The desk audit also gives an indication of the effectiveness of the audited site's document management system.

### Remote audit<sup>2</sup>:

A remote audit is a method, permitted only under certain conditions to be defined by REDcert or, if applicable, the European Commission, of carrying out an audit no longer solely with the physical presence of the people involved, but virtually with the aid of suitable **information and communication technologies (ICT)**. Remote audits are **not permitted** if

- the scheme participant is being audited to verify conformity with the requirements of the REDcert-EU scheme
- major non-conformities were found during the last audit
- significant changes have occurred, e.g. in site management, processes, activities or responsibilities for relevant processes (subject of the audit)
- there are risks that jeopardise the effectiveness of the audit (e.g. classified information).

REDcert assumes that remote audits are not the norm, as they cannot replace face-to-face contact and on-site assessment.

At the same time, the audit methods described here can be applied when conducting **scheme audits, special audits and sample inspections**.

## 3.3 Process and duration of audits

**Audits must be carried out in accordance with the requirements of ISO 19011.**

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<sup>2</sup>International Accreditation Forum (2018): Mandatory document on the use of information and communication technologies (ICT) for audit/review purposes. IAF MD 4:2018.

The **duration of the audit** is determined by the respective certification body and contractually agreed with the respective scheme participant prior to beginning the audit.

REDcert, however, has the right to define a minimum duration for the respective steps in the future, particularly based on the audit results, in the interest of quality assurance.

In practice, the initial audit, which must be passed before issuing a certificate under REDcert-EU, may typically require more time compared to other audit types described in this document (e.g. re-certification audit).

In order to ensure that certification decisions are made in due time after the beginning of an audit and therefore the audit evidence reflects the current situation at economic operator level, the maximum total duration between the first and last day of the audit/inspection is:

- for interfaces: max. 4 months between day 1 and last day of audit
- for group member inspections: max. 6 months between first and last (sample) inspection of group members

In case the deadlines are not met audits/inspections must be fully repeated.

To ensure continuous certification, the re-certification process must be completed before the expiry of the currently valid certificate in line with Article 10 (1) of the Implementing Regulation (EU) 2022/996.

The audit must cover the following content at a minimum:

- a) Identification of the activities undertaken by the economic operator which are relevant to the scheme's criteria
- b) Identification of the relevant systems of the economic operator and its overall organisation with respect to the scheme's criteria and checks of the effective implementation of relevant control systems
- c) An analysis of the risks which could lead to a material misstatement, based on the auditor's professional knowledge and the information submitted by the economic operator. This analysis takes into consideration the overall risk profile of the activities, depending on the level of risk of the economic operator and the supply chain, above all at the immediately upstream and downstream phases, for example, for economic operators that handle material listed in Annex IX to the Revised Directive (EU) 2018/2001. The audit intensity or scope, or both, must be adapted to the level of overall risk identified, also based on plausibility checks of a plant's production capacity and the declared quantities of fuels produced

- d) a verification plan which corresponds to the risk analysis and the scope and complexity of the economic operator's activities, and which defines the sampling methods to be used with respect to that operator's activities
- e) implementation of the verification plan by gathering evidence in accordance with the defined sampling methods, plus all relevant additional evidence, upon which the verifier's conclusion will be based
- f) a request to the economic operator for the provision of any missing elements of audit trails, an explanation of variations, or a revision of claims or calculations, before reaching a final verification conclusion
- g) verification of the accuracy and completeness of data encoded by the economic operators or their representatives in the Union database

### 3.4 Audit intervals

The certification body must conduct a scheme audit **at least once a year** to determine whether the operation still satisfies the requirements for certification.

The re-certification audit and the subsequent certification decision should be carried out before the existing certificate or inspection certificate expires to ensure that certification is continuous.

For **collectors and suppliers of waste and residues** the following also applies:

A mandatory **surveillance audit** must be carried out by the corresponding certification body of the collector and supplier after 6 months after the initial certification (for the second mass balance period). For collection points and suppliers who handle both waste and residues (e.g. used cooking oil/fat) and comparable raw materials (e.g. virgin vegetable oil), an additional surveillance audit is carried out **three months** after the initial certification (for the first mass balance period).

### 3.5 Evaluation of the audit results

The evaluation of the REDcert requirements and the respective number of points are shown in the table below.

Table 1: Evaluation options in the REDcert scheme

Evaluation	Explanation	Number of points
Compliant	Complete compliance	20 points
Minor	Minor non-conformity	15 points
Major	Major non-conformity	5 points
Critical (KO)	Scheme requirements are not fulfilled (critical)	0 points
N/A	Scheme requirements are not applicable (requirements evaluated as N/A must be explained in the audit report), not all criteria can be evaluated as "N/A")	0 points

In addition, several criteria are defined as "KO" (see the respective checklist). Because not satisfying a defined **KO criterion** puts the integrity of the scheme at risk, a certificate cannot be issued following a KO evaluation. In this case, a new audit must be performed. The new date is to be agreed with the respective certification body depending on the type and severity of the non-conformity.

A **critical evaluation** which recurs in the subsequent audit, and which was not previously defined as a KO criterion can be evaluated as KO in this audit.

The **preliminary result of the audit** is determined by the auditor at the end of the audit and explained to the audited company. Points are used to weight the results. Depending on the number of points achieved or whether a criterion is evaluated as critical, the audits are categorised into the following groups:

#### Compliant (100%)

No problems were found, the REDcert requirements are fully satisfied. The total number of possible points is achieved.

- Certificate/inspection certificate can be issued



### Partially compliant (75–99%)

The scheme requirements are not fully satisfied but the non-conformities found do not put the scheme integrity at risk. A minimum of 75% of the total number of possible points is achieved.

The corrective measures agreed with the certification body and/or auditor must be implemented by the dates specified.

- Certificate/inspection certificate can be issued once the auditor responsible has accepted the corrective measures proposed by the operation and the time periods for their implementation.

### Non-compliant (< 75% and/or KO evaluation(s))

Significant problems were found in the fulfilment of the REDcert scheme requirements. Scheme integrity is not assured.

- No certificate/inspection certificate.

The non-conformities found are tracked and sanctions introduced (not in the case of initial certifications) in accordance with the REDcert **sanction management system** (see REDcert scheme principles for integrity management).

If the audit result is “non-compliant” (< 75% and/or KO evaluation), the neutral **certification body** is required:

- **to inform REDcert within 24 hours** (i.e. send the audit report to REDcert in electronic form to [cab@redcert.de](mailto:cab@redcert.de))
- to agree to **corrective measures** with the scheme participant and
- to **define an appropriate timeframe or a deadline** by which the operation has to verify implementation of the corrective measures – usually through another on-site inspection. The **follow-up audit** must have been conducted no later than three months after the previous audit. If after three months no follow-up audit has been carried out, a **full scheme audit** is required to obtain a new REDcert confirmation of conformity.

**Prior to re-certification, the certification body must inform REDcert if an economic operator that was previously found to be in non-conformity (major non-conformity) of the requirement in the following areas:**

- to indicate the names of all schemes they participate in and
- to make all relevant information, including the mass balance data and the auditing reports, available to the auditor, or
- to disclose whether they were found to be non-compliant with any other aspect of the mandatory sustainability criteria.

### 3.5.1 Definitions of “non-conformities”

**“Minor” non-conformities** of REDcert criteria are non-conformities that:

- have limited impact
- constitute an isolated or temporary omission
- are not systematic and do not lead to general failure if they are not remedied.

**Example:**

Omission of a parameter in the GHG calculation that does not have a significant impact on the GHG intensity report.

**“Major” non-conformities of REDcert criteria are non-conformities that:**

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

**Examples:**

- systematic problems with the mass balance or GHG data reported for example, incorrect documentation is identified in more than 10% of the claims included in the representative sample
- failure of an economic operator to declare participation in other voluntary schemes during the certification process

- failure to provide relevant information to auditors for example, mass balance data and audit reports

**“Critical” non-conformities of REDcert criteria are:**

The intentional violation of a voluntary scheme’s standards such as fraud, irreversible non-conformity, or a violation that jeopardies the integrity of the voluntary scheme shall be considered to be a critical non-conformity.

**Examples:**

- non-compliance with a mandatory requirement of the Revised Directive (EU) 2018/2001, such as land conversion which contravenes Article 29(3), (4) and (5) of that Directive
- fraudulent issuance of a proof of sustainability or self-declarations, for example, intentional duplication of a proof of sustainability to seek financial benefit
- deliberate misstatement of raw material description, falsification of GHG values or input data as well as the deliberate production of wastes or residues, for example, 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
- Land conversion that contravenes RED III Article 29(3-7)
- intentional production of waste and residues (e.g. mixing vegetable oil with used cooking oil (UCO = Used Cooking Oil))

**KO definition of REDcert criteria:**

- Requirements which, if not complied with, have a particularly critical effect on scheme integrity or which are extremely important for the scheme for other reasons.

### 3.5.2 Corrective measures, time periods and impacts

**All evaluations, except where there is 100% compliance, must be transparently explained in the audit report.** For all identified minor, major and critical/KO non-conformities, corrective measures are also defined, including appropriate time periods and responsibilities.

For minor, major and critical/KO non-conformities, the audited scheme participant proposes corrective measures to the auditor.

The **action plan** documents the evaluations with the respective comments and corrective measures, including appropriate time periods and responsibilities. If it was not possible to completely define the action plan during the audit, it must be finalised with the responsible auditor at the latest 7 days after the audit by the audited scheme participant and submitted to the certification body. **In the case of criteria evaluated as major, critical and KO, measures must be defined immediately.**

The scheme participant is responsible for **implementing the corrective measures** within the time period agreed with the certification body.

#### Criteria evaluated as minor

- In the case of an initial audit, non-conformities found to be minor must be remedied by appropriate corrective measures and confirmed by the auditor before an initial certificate can be issued.
- In the case of surveillance or re-certification audits, corrective measures must be verifiably implemented by the next regular audit at the latest; the certificate can be continued or re-issued.

#### Criteria evaluated as major

- Corrective measures must be verifiably implemented no later than **40 days** after the audit. Extraordinary circumstances may justify an extension of the time limit by another 30 days. Any such extension is subject to the PRIOR consent of REDcert.
- No certificate is issued (initial audit) until the agreed corrective measure(s) has (have) been implemented in a verifiable, appropriate and timely manner.
- The existing certificate is suspended for a maximum period of 40 days if the deadline for implementing measures is not met.

- The existing certificate is withdrawn if, during the period of suspension, the agreed corrective measure has not been implemented in a verifiable, appropriate and timely manner.

#### Criteria evaluated as critical

- Immediate suspension of an existing certificate (for surveillance or re-certification audits)
- Corrective measures must be verifiably implemented no later than **30 days** after the audit
- No certificate is issued (initial audit) until the agreed corrective measure has been implemented in a verifiable, appropriate and timely manner

Withdrawal of the existing certificate if the deadline for implementing measures of 30 days has been exceeded.

#### Criterion defined as KO

- Failure to comply with any of these criteria may result in a review of the certification status and, where appropriate, corrective action. This may include a temporary suspension or, in serious cases, withdrawal of the certificate. However, an initial audit will first identify opportunities for improvement.

**During the suspension of a certificate, system participants may NOT declare biomass as sustainable.**

**Scheme participants with a suspended certificate may not join another voluntary scheme with the same scope.** Every potential REDcert scheme participant must disclose upon registration whether and to what extent he has already been or is a participant in another certification scheme (see REDcert Scope and basic scheme requirements).

Agricultural companies whose **self-declaration has expired, and which have been excluded from a group due to critical non-conformities (KO)** can only claim sustainability **once a new audit has been carried out**. The new audit takes place as part of the re-certification of the group for which a valid self-declaration was previously submitted.

If a farm has been excluded from a group, it is **obliged to disclose** this when submitting another self-declaration **to a different group manager**.

Different group managers **can refuse to accept a corresponding self-declaration for a period of at least two years**.

The certification bodies are required to immediately update the status of a certificate in the database. **The implementation of the corrective measures is verified by the certification body.**

If agreed corrective measures have not been effectively implemented resulting in a new non-conformity with the corresponding requirement in a subsequent audit, this requirement may be given a lower evaluation. This means that, for example, a non-conformity previously evaluated as minor may be evaluated as major if the minor non-conformity has not been corrected by the economic operator.

REDcert reserves the right to set other time periods for the corrective measures based on the respective degree of fulfilment.

### 3.6 Reporting

After the audit, the auditor creates the **audit report** using the report forms (checklists) provided by REDcert that are part of the phase-specific checklists. This report must be countersigned by the person responsible in the operation undergoing the audit. This may be done by digital signature or by means of manual signature on the first page of the audit report (cover sheet).

The audit report/checklist contains information about e.g.:

- the start and end of the audit (duration of the audit)
- the address where the audit was conducted (operational site)
- the audit participants
- the result of the audit
- the evaluation of each individual requirement
- a list of the documents checked

The audit report also includes information on how the operations are classified to determine the scope of the audit, the type of biomass and any agreed corrective measures including their implementation. The former is also noted on the certificate/inspection certificate. By collecting this information, the audit report also gives a comprehensive overview of the audit and certification process.

**Copies of the audit report (checklists) is provided to REDcert by upload to the REDcert database not later than 60 days after the end of the on-site audit. This task is done by relevant staff of the certification body.** As part of internal monitoring, REDcert requires certification bodies to provide all audit reports and actual GHG value calculations (including relevant background information where appropriate) on the use of GHG emission saving credits ( $e_{ccr}$ ,  $e_{ccs}$ ,  $e_{sca}$ ) to REDcert. If there are questions about the results, REDcert contacts the respective certification body.

**If the audit shows that the operation has failed the requirements of the REDcert-EU certification scheme, the report must be electronically submitted to REDcert within 24 hours after the audit has been completed.**

### 3.7 Document check

When checking documents, there are a number of ways to lower the risks borne by the downstream economic operators in the supply chain. For example: **economic operators occasionally participate in several voluntary certification schemes** to meet customers' demand for certain certification labels. This makes it particularly challenging for auditors who verify the **mass balance** of these kinds of economic operators as they need to have the complete picture of all relevant transactions. The economic operators therefore need to ensure that the auditor knows which schemes they participate in, and that all relevant information is made available to the auditor. This also includes the full mass balance records for a site and also access to reports from previous audits<sup>3</sup>.

During annual audits, the auditor checks the following at a minimum:

- list of all sites under the scope of certification (each operating site must have its own mass balance system)

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<sup>3</sup> European Commission DG ENER: Letter on tracing the origin of waste and residues used for biofuels to prevent fraud (10.10.2014).

- list of all incoming consignments of sustainable biomass or biomass fuels in the mass balance system (inputs) per site and a description of the material and the details of all suppliers
- list of all outgoing consignments of sustainable biomass or biomass fuels in the mass balance system (outputs) per site, including a description of the material and the suppliers or customers

Note: the mass balance records must contain information on both the inputs and the outputs of sustainable and unsustainable material (including where relevant fossil fuels) handled by the sites.

- proof of every conversion step (conversion factor applied) that takes place in the case of installations processing biomass raw materials to allow this result to be incorporated into the calculation (particularly to ensure that the process is not modified to produce more waste or residues).
- a sample of the calculations (inputs, outputs, conversion factors, and any balances carried forward). All data must be reconciled with the accounting system.

Information on the calculation of the mass balance can be provided e.g. by contracts, business documents etc. and should be traceable in the accounting system.

- the mass balance time period (no longer than 3 months; for producers of agricultural and forest biomass and first gathering points that only source agricultural or forest biomass no longer than 12 months) which should be transparent, documented and consistent
- the results of each sustainable biomass balance (positive/balanced/negative balance)
- equivalence of the sustainability data and the physical stock at the end of the mass balance period
- allocation of sustainability characteristics

Inputs and outputs should be accompanied, where relevant, by a set of sustainability characteristics. Auditors should check that sustainability characteristics have been allocated appropriately. At the end of the mass balance period, the sustainability data carried forward should be equivalent to the physical stock.

**The auditor also receives all information on the mass balance prior to a planned audit.** The last mass balances completed during the period under review must be



inspected. During initial audits, the auditor should check the existence and functioning of the mass balance system (see REDcert Scheme principles for mass balancing).

The on-site audits carried out in the REDcert scheme by recognised certification bodies ensure that the economic operator meets the mass balancing requirements, including proper allocation of sustainability characteristics, where relevant.

To improve the robustness of the verification procedure (audits), economic operators are only allowed to use actual values after the capability to perform such a calculation according to the **GHG emission calculation** methodology has been verified by an auditor. This check can take place during the audit of the economic operator before the participation in the voluntary scheme. REDcert also requires economic operators to make all relevant information about the calculation of actual GHG emissions available to the auditors in advance of the planned audit. This includes, but is not limited to, input data and any relevant evidence, information on the emission factors and standard values applied and their reference sources, GHG emission calculations and evidence relating to the application of GHG emission saving credits ( $e_{sca}$ ,  $e_{ccr}$ ,  $e_{ccs}$ ).

The auditor in turn should record the emissions from the processing occurring at the audited site (emissions after allocation) and if relevant the achieved savings in the audit report in order to document that the calculation was thoroughly verified and understood. In case those emissions deviate significantly from typical values, the report should also include information that can explain the deviation<sup>4</sup>. In case those emissions deviate significantly from typical values (**i.e. greater than 10%**), or **calculated actual values of emissions savings are abnormally high**, the audit report **shall** also include information that can explain the deviation. **Certification bodies must immediately inform REDcert of such deviations.** For more information, see the REDcert scheme principles for GHG calculation.

**Collection points** are required to submit a list of all producers that have signed a self-declaration to the auditor prior to the audit of the collection point. The amount of waste generated per month (or year) must be explicitly stated on the self-declaration. Evidence or documents for all individual deliveries must be available at the collection point and verified by the auditor (e.g. waste disposal agreement, delivery slips, self-declarations, etc.).

The auditor also verifies the existence of, and volume supplied from at least the square root of the producers on the list supplied by the collection point in all cases (see also section

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<sup>4</sup> European Commission DG ENER: Note on the conducting and verifying actual calculations of GHG emission savings, Version 2.0 (2017).

4.4.1). The verification may be undertaken remotely, unless there is doubt about the existence of the producer or if the collecting point meets the criteria for an on-site audit as set out above (see also section 2.2).

### 3.8 Risk management

Risk management, which is an important component of the internal quality management system, is designed to ensure that the participants along the value chain are subject to in-depth audits and at sufficient intervals so that the legal requirements set forth in the Revised Directive (EU) 2018/2001 and scheme-specific requirements for biomass production, conversion and supply can be guaranteed with the highest level of reliability.

REDcert accounts for **particularly critical risk criteria** that endanger the integrity of the scheme for all steps along the supply chain by defining them as KO criteria. This means that non-compliance with one of these criteria results in non-certification (under the scope of the initial/re-certification audit) or in the immediate loss of the certificate (under the scope of follow-up/surveillance audits). In the event of non-compliance with criteria that represent a **low or medium risk**, certification or continuation of certification is only possible if the respective corrective measures are implemented that guaranteed fulfilment of the scheme requirements.

Deadlines are agreed and compliance monitored depending on the severity of the non-conformity. This is the responsibility of the certification bodies and is checked regularly by REDcert.

Further information on maintaining scheme integrity is included in the REDcert scheme principles of integrity management.

### 3.9 Issuing and withdrawing certificates

It is up to the discretion of the respective certification body to decide whether to issue or withdraw a certificate.

A maximum of **60 days** may lie between the (last) day of audit and the issuance of the certificate. If this is the **initial certification**, the certificate may only be issued after a scheme contract has been signed between REDcert and the economic operator. The templates and checklists provided by REDcert must be used.

The certification bodies are required to IMMEDIATELY update the **status of a certificate** in the REDcert database.

If the **REDcert scheme contract** is terminated, any valid certificates are automatically withdrawn.

Certificate status

- **valid:** an active certificate following the successful completion of an audit
- **suspended:** temporary invalidated certificate due to non-conformities identified by the certification body or upon voluntary request of the economic operator
- **withdrawn:** permanently cancelled certificate by the certification body or the voluntary scheme. Possible reasons for a certification body to withdraw a certificate include early re-certification, major non-conformity, change of certification body
- **expired:** certificate that is no longer valid
- **terminated:** a certification that has been voluntarily cancelled while it is still valid

The history of **all** certificates issued under the REDcert-EU scheme can be accessed in the public **REDcert certificate database** (available at [www.redcert.org](http://www.redcert.org)) for a period of at least 5 years.

## 4 Scope of audit/certification

**Individual audit and certification** of a single operating site

The audits/certifications only apply for the operating site in which they were performed (**site-specific**). The audited site (interface or dependent/non-autonomous site) audited is issued a **certificate or an inspection certificate** when it passes the audit (see section 2.5).

All economic operators along the supply chain can be individually certified as well. Customers can check at any time in the **REDcert certificate database** whether a certificate is valid and, if so, for how long ([www.redcert.org](http://www.redcert.org)).

In the case of a **first gathering point**, all operating sites (affiliated dependent/non-autonomous sites) must be included in the audit.

**Affiliated dependent/non-autonomous storage facilities or operating sites** are storage facilities or operating sites (e.g. concrete slabs, silos, tanks, etc.) which are part

of an interface and receive biomass, weigh it if necessary and keep records of all incoming and outgoing biomass, but do not perform invoicing.

All storage facilities that accept and store sustainable biomass on behalf of the first gathering point must be certified. Storage facilities and silos that belong to the first gathering point and accept and weigh biomass and keep records of all incoming and outgoing biomass, but do not perform invoicing, also have to be audited. The storage facilities are inspected as part of the audit of the first gathering point. The first gathering point is audited once a year. After a successful audit, the first gathering point is issued a certificate that includes an annex containing a list of all storage facilities.

A **farm** can belong to a group which is described below (see section 5). If not, every site must be audited and certified separately.

Non-autonomous sites (storage facilities) of a **collection point** must be audited by means of a random sample as part of the certification of the collection point. The collection point is audited once a year. Where a collection point has multiple storage sites, the auditor shall audit the mass balance of every storage site.

## 4.1 Audits and certification of dependent/non-autonomous storage facilities and logistic services (upstream operations)

### **The following applies for first gathering points/collectors (first interface):**

Dependent/non-autonomous storage facilities and operating sites are subject to **sample inspections as part of the audit** of the first gathering point/collector.

The first gathering point and collector are audited/certified once a year (every 12 months).

The inspection of the storage or operating sites must always be carried out and completed before a certificate including list of all dependent/non-autonomous storage or operating sites can be issued to the first gathering point/collector including the storage or operating sites.

### **The following applies for all other downstream interfaces:**

**Group certification is not possible** for economic operators downstream in the supply chain. These economic operators need individual certification – sample inspections and group certification are not possible for these economic operators.

#### 4.1.1 Scope and process of sample inspections for storage facilities

The **minimum number of sites to be inspected** is the square root of the total number of sites ( $\sqrt{y}$  where  $y$  is the number of sites) rounded up to the next whole number. The risk factors listed below form the **basis for the sample inspections**. A representative selection of the various sites should be inspected. The following **selection criteria** must be considered:

- results of the internal inspections of the sites and assessments of the management and/or previous certification inspections
- documents with complaints and other relevant aspects for corrective and preventative measures
- significant differences in the size of the operations
- deviations in shift models and work procedures
- complexity of the processes in the individual operations
- changes since the last certification
- geographic distribution of the operations
- additional risk criteria at the discretion of the respective certification body
- 25% of the samples are to be selected randomly

This selection does not have to be made at the beginning of the inspections. It can also take place once the first gathering point/collector has already been audited. In every case, **the inspection of the individual sites must be carried out and completed before a certificate can be issued for the first gathering point/collector including his individual storage facilities.**

#### 4.1.2 Threshold for a failed inspection of storage facilities or operating sites

If the audit result of one of the sites is “non-compliant”, a certificate is not issued or the certificate is withdrawn for the first gathering point/collector (for the entire group). In addition, the certificate is also flagged as “withdrawn” in the REDcert database. Because only sites with valid certificates may supply sustainable biomass, **neither the first gathering point nor the individual storage facilities/operating sites may continue**

**to sell sustainable biomass** if this kind of major non-conformity is found. A current list with valid certificates can always be accessed under [redcert.eu/ZertifikateDatenAnzeige](https://redcert.eu/ZertifikateDatenAnzeige).

#### 4.1.3 Audit requirements on logistics facilities

**Logistic facilities (and their use)** are defined as locations where:

- incoming and outgoing goods are not documented
- the incoming biomass is not weighed
- short-term storage for the purpose of transshipment does not generally exceed 24 hours
- the containers are not changed/mixed (e.g. transferred to new containers)
- delivered biomass is not processed/treated

Logistic facilities are defined accordingly as sites where goods (biomass or waste and residues) are only provided for transport. The waste regulations relevant for the use of logistic facilities must be complied with.

**For those logistic facilities as described above, the following requirements apply:**

1. registration as an operating site in the REDcert database by the collector using this facility,
2. each transfer of goods via the facility has to be registered in the collector's mass balance which has to be audited at the collector's premise/office and
3. annual on-site audit of ALL logistic facilities as part of the collector's activities under the scope 'collector'.

#### 4.1.4 Audit requirements on dependent logistics services

If a collector uses external logistic services to perform its collection process (collecting waste and residues at a point of origin and transporting them to the collector's premise) these external logistic services must be audited annually on-site as part of the collector's activities in the same way as the collector's own logistics have to be subject of the audit. Therefore, the collector has to register such external logistic services in the REDcert database as an 'operating site' to assure transparency of all its activities under the scope 'collector' for the certification body in charge.

## 5 Group certification

Group certification is the certification of a group of operations where the certification applies to the group as a whole. In these cases, **a selection of various operations in the group can be subject to a sample inspection as proof that all group members comply**. The audit is conducted **once a year**. The sample inspections are defined by the certification body. The **inspection certificate** is valid for all group members.

REDcert uses the term **"sample inspection"** to mean an external review by the neutral certification body at the level of the biomass producer/waste producer for group certification or the inspection of dependent operating sites. In contrast, REDcert uses the term "scheme audit" to refer to an external review of the REDcert requirements of interfaces or scheme participants by the neutral certification body.

### 5.1 General requirements

#### Group certification is possible for

- a group of farms,
- a group of producers of waste and residues from biomass and for
- producer organisations and cooperatives that deliver the raw material directly to the first gathering point or to storage facilities or collection points that belong to the first gathering point.

This **option may not be used** by downstream economic operators in the supply chain (see also section 3.1).

Group certification is only permitted for largely **homogeneous groups** with an identical scope.

Group auditing to prove compliance with the **land-related scheme criteria** are only acceptable

- if the areas concerned are in close proximity and
- have similar characteristics
- the group members have similar production systems and
- types of crops (this is a prerequisite for group certification).

Group audits for the **purpose of calculating GHG savings** are only acceptable if the sites have similar production systems and types of crops.

## 5.2 Requirements of group management

### 5.2.1 Central office/group manager

Individual economic operators who have come together to form structured groups may be certified as a group in accordance with Article 12 of the Implementing Regulation (EU) 2022/996. These groups are partially responsible for carrying out this audit. To this end, the group needs an **internal management system** to create confidence that the individual group members meet the scheme requirements. The group does not have to be an independent legal entity, but all of the farms in the group must be **legally or contractually** affiliated with the central office of the group and be subject to a shared management system that is defined and set up as well as monitored and internally inspected by the central office. This means that the central office is authorised to carry out internal (sample or full) inspections and to instruct the sites to take any necessary corrective action. This must be documented, if necessary, in the official contract between the central office and the sites.

#### Requirements of the group manager:

- administration of an internal management system to create confidence that the individual group members meet the scheme requirements
- establishment of an internal inspection system to monitor conformity of the group members with the criteria defined in the REDcert-EU scheme
- maintenance of an updated list of group members
- transparent representation of the delivery relationship with the operations by means of contracts or invoices
- authority to decide whether group members may join the group or be excluded
- responsible management of the certification process
- communication between the neutral certification body and group members
- annual **on-site** audit and certification as group manager by the neutral certification body



Prior to a group audit, the group manager must provide the certification body with an up-to-date list of all members belonging to the group. Members join a group of this kind by submitting a **self-declaration**.

In **case of waste and residue producers** the list of all group members must also contain the **indicative volumes** (monthly or annual) of waste or residue they can supply to a collector.

**The following requirements apply to producer organisations and cooperatives:**

- The central office of the cooperative must keep a list of members and can decide which operations may join the group.
- There must be valid contracts between the individual operations and the group.
- The group must have or set up a shared central office and appoint a representative of the group management who is responsible for managing the group and implementing the scheme requirements.
- The central office is responsible for the management of the certification process and the communication between the certification body and the group members.

**The following requirements apply to the groups of farms that are organised by the respective first gathering point:**

- The first gathering point must keep a list of the operations in the group and can decide which operations may join the group.
- The supply relationship must be transparent through contracts with the operations and invoices.
- The first gathering point is responsible for the management of the certification process and the communication between the certification body and the operations.

Prior to the audit, the group manager must provide the certification body with an appropriate and practical **overview of the self-declarations submitted** to determine the sample size and the production units to be inspected with adequate lead time.

### 5.2.2 Group member

#### Requirements of the group members:

- obligation to the group manager to comply with the requirements of the REDcert-EU scheme
- submission of a valid, signed and non-contradictory self-declaration to the group manager (to be updated annually)
- participation in the sample inspections to be carried out externally by the neutral certification body
- obligation to remedy any problems identified within the agreed time periods

## 5.3 Self-declaration

All group members, without exception, must submit a valid, signed and non-contradictory self-declaration in accordance with REDcert's content specifications (samples are available at [www.redcert.org](http://www.redcert.org)).

### 5.3.1 Agricultural biomass producers

The REDcert-EU scheme distinguishes between **conditionality (former cross-compliance) and non-conditionality (former non-cross-compliance) farms**. Accordingly, the following self-declarations are available for submission:

- **Self-declaration for conditionality farms (former cross-compliance)**

With his signature, the "**conditionality farmer**" confirms, among other things, that he is a recipient of direct payments and therefore subject to conditionality and that the biomass meets requirements for the production of agricultural biomass (Art. 29 of the Revised Directive (EU) 2018/2001).

- **Self-declaration for non-conditionality-farms (former cross-compliance)**

With his signature, the "**non-conditionality-farmer**" confirms, among other things, that he meets the requirements of the REDcert-EU scheme for the production of sustainable agricultural biomass (REDcert scheme principles for the production of biomass, bioliquids and biomass fuels).

### 5.3.2 Waste and residue producers

The following self-declarations are available for submission in the REDcert-EU scheme for waste and residue producers:

➤ **Self-declaration for the supply of waste and residues for biofuel production**

The waste and residue producer confirms with his signature that the delivered material is exclusively waste, or residue as defined by the Revised Directive (EU) 2018/2001.

## 5.4 Scope and process of sample inspections

The **group** is inspected at least **once a year** (every 12 months) by a neutral certification body for compliance with the REDcert-EU scheme requirements using the scope-specific checklists provided by REDcert. These regular neutral inspections always consist of:

- scheme audit and certification of the group manager (**central office**) and
- the sample inspections of **group members**.

### 5.4.1 Sample size

The sample size is determined by the certification body **based on risk**. The **overall group** is formed by the number of valid self-declarations submitted to the group manager and is the basis for determining the sample size.

The **scope of the group members subject to sample inspections** is determined by the certification body based on risk, considering the following basic rules:

The minimum number of sites for sample inspections is the square root of the total number of sites ( $\sqrt{x}$  where  $x$  is the number of sites) rounded up to the next whole number. The number of signed self-declarations at the time the sample is determined is relevant for determining the sample.

The sample size increases if a threshold of failed inspections is exceeded (see section 5.6)

**If a valid certification for another EU voluntary scheme exists, the following is required for the initial inspection when changing to the REDcert EU scheme:**

- the list of suppliers from the last certification audit forms the basis for the sample, as long as the schemes have a similar structure.
- In the case of a re-certification audit, the two items above – the list of suppliers from the previous certification audit under another EU voluntary scheme, along with the currently signed self-declarations under the REDcert-EU scheme – determine the sample size.

If the number of signed self-declarations is different from the number of suppliers in the list for the previous audit, the larger number must be used.

### Agriculture

Agricultural biomass producers must be inspected as follows within the scope of group certification:

- **Conditionality (former cross-compliance) farms** are subject to sample inspections.
- **Non-conditionality (former cross-compliance) farms** – if they are also members of a group – are subject to sample inspections.

For **conditionality and non-conditionality farms within a group**, subgroups must be formed and inspected according to the specifications in section 5.5.

### Waste and residues

As part of every on-site audit of collection points, operations that supply waste and residues (known as **waste producers** or **points of origin**) are subject to sample inspections.

Waste producers that supply

- **more than 5 tonnes** of waste or residues a month (annual average) of waste or residue listed in part A and B of Annex IX to Revised Directive (EU) 2018/2001 must be inspected **on-site** by way of random sampling ( $\sqrt{x}$  where x is the number of sites)
- **less than 5 tonnes** of waste or residues do not generally need to be inspected on site. However, risk-based inspection of these waste producers is still possible.

REDcert reserves its right to define smaller quantities for mandatory on-site auditing in case of suspected fraud or if an appropriate industry standard or a voluntary commitment, which determines the sample size, is applicable.

In addition, **sampling can only be applied** if the contractual basis on which the point of origin operates prevents incentives to make false claims about the nature of the raw material, and if the risk of fraudulent behaviour is low.

Waste producers to which sample inspections cannot be applied must be inspected individually.

All waste and residue producers of downstream interfaces are always subject to certification.

#### 5.4.2 Selection of the samples

The selection of sample inspections is determined and documented by the certification body.

When selecting **agricultural biomass producers** for the sample inspection, special priority must be given to the following **risk criteria** (risk assessment):

- The self-declaration does not apply for the entire quantity of biomass produced by the operation.
- Sustainable and non-sustainable biomass is produced at the same site (the operation supplies both types of biomass).
- The biomass is cultivated on nationally or internationally recognised protected areas and is subject to special requirements.
- Size of the supplier (actual quantity supplied)
- 25% of the sample must be selected randomly

In the case of **biomass from waste and residues**, the sample must be selected with a view to risks, considering the following **factors**:

- the type of waste producer
- type of waste and residue (e.g. multi-feedstock)
- type of GHG calculation (primarily when calculated individually)
- 25% of the sample must be selected randomly

### The sample must

- be representative for the entire group and
- be determined using a combination of risk and random selection (for random selection, the sample must represent a share of at least 25%). **The type of sample and the underlying risks as well as their assessment must be documented.** The sites selected for inspection should vary from year to year.

## 5.5 Sample inspections

As part of the sample inspections carried out by the certification body, the REDcert-EU requirements of group members are inspected and evaluated using the **scope-specific checklists** provided by REDcert.

The inspections are based on the plausibility and traceability of the information in the self-declaration.

It is generally expected that **group audits are conducted on site** (e.g. that auditors visit the individual producers).

**Desk audits** may be allowed if they provide the same level of assurance as an on-site inspection (e.g. through the availability of high-quality satellite images, data on protected areas and peatlands that provide information for the relevant time frame). Certification bodies must demonstrate under which conditions desk audits can provide the same level of assurance as on-site audits.

To this end, **criteria must be defined** to enable

- the general risk level/potential of a region/area to be determined
- which consequences the risk level/potential has for conducting the inspections and
- what type of proof needs to be available to permit desk audits (self-declarations from economic operators cannot be regarded as sufficient proof in this context).

The defined criteria (see section 4.5.1) as well as the proof used as a basis for a desk audit must be accessible, transparent, traceable, tamper-proof, credible and trust-worthy.

If the desk audit shows that the REDcert requirements are not or not adequately satisfied, the certification body must undertake further appropriate steps to check compliance (e.g. on-site audits).

### 5.5.1 Agriculture

Examples of what needs to be inspected in and for the respective time frames of the **agricultural sample inspections** (on site and as a desk audit):

- proven conformity with conditionality (former cross-compliance) requirements
- detailed and documented information about and/or independent traceability databases and
- tools to identify the farm and its farmed areas, etc.

The documentation on where the biomass was farmed (records) must be kept by either the farm or the first gathering point/central office.

### 5.5.2 Waste and residue producers

Collection points, interfaces and suppliers that operate in the supply chain and are registered in the REDcert scheme are required to undergo inspections and be certified.

The sample **inspections of the producers** carried out by the neutral certification body include the following:

- the requirements for traceability and mass balancing (i.e. the volume of waste and residues supplied)
- the documentation requirements
- the requirements for the GHG emissions saving and the calculation method and, if applicable, the sustainability requirements for biomass production

In case of reasonable doubts about the nature of the declared waste and residues, the auditor is authorised to take samples and to have them analysed by an independent laboratory for the purpose of clarifying the nature of the material. This option is applicable for producers as well as for collectors and suppliers of waste and residues.

For biomass produced from waste or residues – as long as they did not originate from agriculture, forestry, fishing or aquaculture – there is no requirement to provide verification of land-related criteria in accordance with the Revised Directive (EU) 2018/2001.

Raw materials listed in Annex IV of the Implementing Regulation (EU) 2022/996 shall be considered to be a waste or residue, except where they have been deliberately modified to be declared as a waste or residue.

Producers (point of origins) who supply waste or residues from biomass to collection points, treatment and processing or conversion plants for the purpose of producing biofuels, bioliquids and biomass fuels must demonstrate that they comply with the requirements of the Revised Directive (EU) 2018/2001 and the REDcert-EU system either via individual certification or via the group certification.

This includes above all the identification of the waste/residue characteristics, the proof of origin of the biomass and the plausibility check of the quantities of waste and residues produced.

The following procedure shall be used for the classification of biomass as waste or residual material:

- Raw materials listed in Annex IV of the Implementing Regulation (EU) 2022/996 are automatically counted as wastes and residues irrespective of their country of origin.
- For materials not listed in Annex IV of the Implementing Regulation (EU) 2022/996, and in the case that the material is sourced in the EU, the relevant national legislation in the country of origin applies. Relevant national legislation can also be applied if the material is sourced in a third country whose legislation is aligned with the EU.
- For materials as listed in Annex IX, Part A and Part B of the Revised Directive (EU) 2018/2001 may qualify as waste or residues. However, only the fact that materials are listed does not automatically mean that they are waste or residues. Raw materials listed in Annex IX Part A and Part B can be regarded as products, by-products, waste or residues. The classification of the raw material shall be determined according to the REDcert guidelines of the *"Scheme principles for the production of biomass, biofuels, bioliquids and biomass fuels"* chapter 5.
- In all other cases, the classification of the raw material shall be determined according to the REDcert guidelines of the *"Scheme principles for the production of biomass, biofuels, bioliquids and biomass fuels"* chapter 5.
- Wastes and residues must be certified at the point of origin and registered into the Union database by the certified point of origin or, in the case of a group, by the group manager.

The classification of biomass as waste or residues can result in different requirements for the proof of sustainability and the calculation of greenhouse gas savings:



- Waste and residues other than agriculture, aquaculture fisheries and forestry residues, do not need to prove compliance with land-related sustainability criteria set out in Article 29(3-7) of the Revised Directive (EU) 2018/2001.
- In the case of waste, no upstream emissions from waste production are counted in the greenhouse gas balance of the biofuels, bioliquids and biomass fuels generated from waste. Waste has zero life-cycle greenhouse gas emissions up to the process of collection of these materials. This applies to all types of residues. It is not possible to allocate greenhouse gas emissions of the main product to waste.
- Residues can be defined as co-products depending on the recovery option. In this case, the greenhouse gas emissions of the main product can be allocated to the co-product and the related sustainability criteria must be met.

In the REDcert-EU system, a precise definition of the waste or residue characteristic is therefore necessary.

Economic operators have to classify their material as waste or residue accordingly and shall keep and present to auditors the underlying evidence for their assessments. Evidence can be provided in several ways (not exhaustive list):

- Process descriptions showing the type, the quantity normally produced by the process and properties of the resulting material
- Documentation of disposal certificates and consignment bills or equal proofs
- Other recognized documents or evidence within the scope of national waste management regulations
- Entries in officially monitored electronic traceability- or database systems

Since REDcertEU is not a public authority it is the responsibility of the auditor during the audit or inspection to determine whether a material is a waste or residue at the point in the supply chain that the material originates. The inspection includes a check that the material has not been deliberately modified to be classed as a waste or residue.

If there are no specific support systems in Europe or the European member states for residue- and waste-based biomass that favour their use over other biomass fuels and thus create incentives for false declarations or fraudulent behaviour, the check of compliance of producers with the requirements of the REDcert-EU scheme can be carried out as a **desk audit** due to the low sustainability risk and replace on-site inspections if

- they are conducted with the same level of reliability and accuracy
- the same depth of inspection can be guaranteed

- the security and confidentiality of electronic and electronically submitted information is guaranteed
- it is carried out by mutual consent between the auditor and the producer to be inspected

The underlying risks as well as their evaluation for a decision in favour of a desktop audit must be documented by the certification body.

## 5.6 Thresholds for failed sample inspections

### Exclusion and extension of the sample

Whenever a farm fails the inspection due to one or more critical non-conformities (KO), or due to non-fulfilment of the requirements ( $< 75\%$ ), this farm must be excluded from the group immediately (see section 5.6. Thresholds for failed random sample inspections).

In order to guarantee the originally sample size, additional farms must be included in the inspection. This increases the total number of farms inspected to  $\sqrt{x} + n$ , where  $n$  is the number of farms where a critical non-conformity (KO) was detected. The risk-based sampling criteria continue to apply when selecting these additional farms.

### Doubling the scope of inspection

A doubling of the inspection sample (to  $2 \times \sqrt{x} + n$ , where  $x$  is the number of farms from the original sample and  $n$  is the number of farms in which a critical deviation (KO) was detected) is required if at least one of the following cases occurs:

1. more than one third of the inspected farms are excluded from the group ( $n \geq 1/3 \times x$ ) because they do not fulfil the system requirements (degree of fulfilment  $< 75\%$ ).
2. at least one critical non-conformity (KO) was detected in the inspected farm.

If cases 1) or 2) apply and lead to the exclusion of more than one third of the farms inspected, the sample must be doubled in accordance with the above rule.

If at least  $1/3$  of the inspected farms from the second sample that do not fulfil the scheme requirements (degree of fulfilment  $< 75\%$ ) are found to have one or more critical non-conformities (KO), the size of the inspections must be doubled again. In an extreme case, this can continue until all sites that belong to this first gathering point have been inspected (inspection density of up to  $100\%$ ). Systemic non-conformities in a majority of the randomly sampled group members ( $> 50\%$ ) result in the group's certificate being suspended or withdrawn.

The first gathering point and/or the main office of the group will be informed of all major/critical non-conformities.

Companies removed from the group as a result of critical non-conformities (KO) must be recorded by the group manager in an appropriate manner and must be reported to the certification body as part of the re-certification process. These companies must be clearly labelled on the list of companies with a valid self-declaration. This list must be made available to the certification body without request.

Only operations that satisfy the scheme requirements may supply biomass certified as "sustainable".

Group members who do not fulfil critical REDcert requirements (KO evaluation) must be excluded from the group and from REDcert certification immediately. They may not rejoin the group until they have successfully passed another inspection in the next sampling cycle when the group is re-certified. A valid and consistent self-declaration must be submitted beforehand.

Group members who do not fulfil the important REDcert requirements (serious non-conformity or < 75 % of the fulfilment points) must be excluded from the group and from the current REDcert certification. In the current certification cycle, they may only rejoin the group once they have demonstrated within a maximum period of 90 days that the non-conformities have been eliminated.

Critical or major non-conformities of individual operations found during an audit must be addressed, as appropriate, in accordance with the procedure set out in section 3.5.2.

## 5.7 Issue of inspection certificates

A certificate for the group manager can only be issued once the sample inspections of the producers have also been successfully completed.

This inspection certificate issued to the group manager is valid for the entire group.

In addition, the requirements in section 6.3.2 apply.

## 6 Requirements and responsibilities of certification bodies

The neutral monitoring and certification of operations in the REDcert scheme is carried out by neutral certification bodies. The certification bodies are natural or legal entities that check compliance with the requirements of the Revised Directive (EU) 2018/2001 along the production and supply chain. Operations can freely choose which REDcert certification body they want to work with. All certification bodies that participate in certification in the REDcert scheme have to fulfil the requirements below.

### 6.1 Requirements for certification bodies

#### 6.1.1 Recognition by a national authority or accreditation body

All certification bodies performing audits on behalf of a voluntary scheme must be accredited to ISO 17065, and to ISO 14065 where it performs audits on actual GHG values.

In addition, certification bodies must also be - as a prerequisite be

- accredited by a national accreditation body and in accordance with Regulation (EC) 765/2008, or for the scope of the Revised Directive (EU) 2018/2001, or the specific scope of REDcert-EU.
- Recognised and supervised by a competent authority for the scope of the Revised Directive (EU) 2018/2001, or the specific scope of REDcert-EU

REDcert reserves the right to require further proof of accreditation for the approval of certification bodies in the REDcert-EU system. A certification body must inform REDcert immediately if the accreditation or approval has been suspended, withdrawn or terminated by the accreditation body or the competent national authority.

The certification bodies conduct their audits in accordance with the requirements in **ISO 19011** (prerequisite for accreditation).

### 6.1.2 Registration by REDcert and contract conclusion

The certification body applies for registration with REDcert; see "Application for registering a certification body" (in section 8.1). The certification body must already be able to carry out audits when the application is submitted. At least one qualified auditor must be registered at the time of registration. When the application form of the potential certification body is completely filled out and all required documents have been submitted, REDcert decides whether to approve or reject the application and informs the applicant of the decision in writing.

REDcert approves the certification body by concluding a written, legally binding **contract** created by REDcert. The certification body is only authorised to perform inspections and issue certificates under the REDcert certification scheme once the signed contract has been received and all other requirements necessary for accreditation (e.g. internal and external training) have been implemented.

### 6.1.3 Quality management (QM) system and documentation

The certification bodies must have a **documentation management system** that addresses each of the following elements

- general management system documentation (e.g. manuals, policies, definition of responsibilities)
- document and record management
- management review
- internal audits
- procedure for identification and management of non-conformities
- procedure for taking preventive actions to eliminate the causes of potential non-conformities

### 6.1.4 Independence and impartiality

Certification bodies must establish integrity rules and procedures to ensure their independence from the economic operators being certified.

This means, that evaluations and decisions may not be affected by personal relationships,

financial incentives or other types of influences. The certification bodies and the auditors are independent of the interfaces, operations and suppliers and free of all **conflicts of interest** and can provide proof of this. Individuals for whom a conflict of interest cannot be ruled out cannot conduct audits at the relevant economic operators and must be excluded from decision-making within the certification body in this case.

The certification body shall require personnel involved in the certification process to sign a contract or other document by which they commit themselves to the following:

1. to comply with the rules defined by the certification body, including those relating to confidentiality and independence from commercial and other interests;
2. to declare any prior and/or present association on their own part, or on the part of their employer, with:
  - a. supplier or designer of products, or
  - b. provider or developer of services, or
  - c. an operator or developer of processes

to the evaluation or certification of which they are to be assigned;

3. to reveal any situation known to them that may present them or the certification body with a conflict of interest.

The following is a non-exhaustive list of examples to be used in the analysis to determine the impartiality of assigned personnel:

- not being involved simultaneously in consultancy and audit with the same economic operator in the past three years
- previous relationships should be assessed on a case-by-case basis
- financial/ business/family relationship.

Although irrespective of the above mentioned, the person may not be assigned to these tasks if the potential still exists for any other conflicts of interest. Certification bodies shall use the above mentioned as a minimum information as input into identifying risks to impartiality raised by the activities of such personnel, or by the organizations that employ them.

### 6.1.5 Technical and staffing requirements

The certification bodies have the respective **equipment and infrastructure** to review compliance with the scheme requirements and the requirements of the Revised Directive (EU) 2018/2001 for all participants in the chain of custody. The certification bodies have

sufficient **qualified staff** who fulfil the requirements listed under section 6. The verification that these prerequisites are fulfilled must be provided by presenting suitable documents on the equipment of the respective certification body, its structure and its staff.

#### 6.1.6 Principle of peer review

To ensure that the principle of peer review is upheld (**separation of evaluation and certification**), the certification body employs at least two people. This means that the decision to approve certification is not made by the same person who performed the audit. The certification body also appoints a person who has in-depth scheme knowledge and is responsible for communication with REDcert.

#### 6.1.7 Handling complaints and claims

The certification bodies must have an effective **process** in place for handling complaints and claims. This process is part of the QM system of the respective certification body and ensures that the fastest possible response is given in the event of complaints and claims and that corrective measures are introduced if necessary.

#### 6.1.8 Selection and appointment of an audit team

The certification body must have a defined **procedure** for the selection and appointment of the audit team, taking into account the competencies required to achieve the objectives of the audit. The audit team must have the appropriate competencies required to conduct the audit to ensure compliance with the criteria of the REDcert-EU scheme and in accordance with the audit scope. If there is only one auditor, the auditor must have the competencies to perform the duties of a lead auditor. If necessary, the audit team can also be supplemented by technical experts who work under the supervision of an auditor.

#### 6.1.9 Rotation of auditors

To ensure the highest possible level of independence of the auditors' judgement the certification body must follow the principles of auditors' rotation.

After three consecutive years for undertaking REDcert-EU audits of the same economic

operator by the same lead auditor, a new lead auditor has to be assigned through the certification body.

Should an alternative lead auditor not be available, an exemption can be made by the certification body and the period can be extended for a maximum of one extra audit. The decision must be justified and documented and provided to REDcert upon request.

## 6.2 Invalidating approval

The approval of a certification body becomes invalid if it is withdrawn, revoked or if it expires or ends some other way.

## 6.3 Responsibilities of certification bodies

Certification bodies that perform inspections under the REDcert certification scheme are responsible for the following:

### 6.3.1 Risk management

**With its risk management, the certification body ensures that all operations and operating sites under the REDcert scheme are inspected at sufficient intervals and with adequate intensity.** This is intended to ensure the greatest possible reliability in the implementation of the requirements of the Revised Directive (EU) 2018/2001 and the requirements of the REDcert certification scheme.

### 6.3.2 Performing audits/inspections and issuing certificates and inspection certificates

The certification bodies have to prove implementation of a **documented process** that governs the certification process and the issuance of certificates and inspection certificates under the REDcert certification scheme. The general requirements of the audit process are specified by the **ISO 19011** standard. Audits/inspections must be properly planned, conducted and documented.

This generally means that the **auditor**:



- identifies the activities undertaken by the economic operator that are relevant to the scheme requirements
- identifies the relevant systems of the economic operator and their overall organisation with respect to the scheme requirements and checks the effective implementation of relevant control systems
- establishes at least a “limited assurance level”<sup>5</sup> in the nature and complexity of the economic operator’s activities
- analyses the risks that could lead to a material misstatement based on the auditor’s professional knowledge and the information submitted by the economic operator
- draws up an audit plan which corresponds to the risk analysis and the scope and complexity of the economic operator’s activities, and that defines the sampling methods to be used for the operator’s activities
- carries out the verification plan by gathering evidence in accordance with the defined sampling methods plus all other relevant proof that the verifier will base his conclusion on
- requests that the economic operator provide any missing elements of inspection trails, explain variations, or revise claims or calculations before reaching a final verification conclusion.<sup>6</sup>

Auditors shall focus to take establish an appropriate risk level, depending on the type of the audit and the risk profile of the economic operator. The assurance level shall be addressed as follows:

- The **initial audit** of a **new scheme participant** or a **re-certification** of **existing scheme participant** under a revised regulatory framework shall **always be on-site** and shall as a minimum provide **reasonable assurance** on the effectiveness of its internal process.
- Depending on the **risk profile** of the economic operator, a **limited assurance** level can be applied on the veracity of its statements. On the basis of the results of the

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<sup>5</sup> A “limited assurance level” implies a reduction in risk to an acceptable level as the basis for a negative form of expression by the inspector such as “based on our assessment nothing has come to our attention to cause us to believe that there are errors in the evidence”, whereas a “reasonable assurance level” implies a reduction in risk to an acceptably low level as the basis for a positive form of expression such as “based on our assessment, the evidence is free from material misstatement”. (see ISEA 3000)

<sup>6</sup> Communication from the Commission on voluntary schemes and default values in the EU biofuels and bioliquids sustainability scheme (2010/C 160/01)

initial audit, those economic operators who are considered low risk may be subject to **subsequent limited assurance** audits.

The certificate issued to the interface is a certificate of conformity. Interfaces are issued a **certificate** when they fulfil the scheme's requirements. Economic operators that fulfil the requirements of the Revised Directive (EU) 2018/2001 but are not themselves interfaces are issued an **inspection certificate**.

Certificates and inspection certificates can only be issued after a positive on-site audit. The certificate or inspection certificate templates provided by REDcert must be used.

### 6.3.3 Lists of interfaces

The certification bodies have to keep a list of all economic operators that they have issued certificates to. **The list has to include at a minimum their name and address as well the unique registration number of the interface, and the security of the data has to be guaranteed.** The data is to be stored transparently in the records and must be up-to-date.

### 6.3.4 Storing and handling information

Certification bodies have to keep the **results of inspections** and **copies of all certificates** that they issue under the REDcert certification scheme for **a minimum of 5 years or longer where it is required by the relevant national authority**. The audit reports are provided solely to the company and REDcert. **If a scheme participant switches to a different approved certification body, the first certification body is required to provide the new certification body with the required data.** The certification bodies are required to document the results of the conformity evaluation in such a way that it is possible at any time for REDcert to check the results and records. In addition, it must guarantee that storage is secure, complete and transparent.

### 6.3.5 External and internal training for auditors

The certification bodies are responsible for implementing external and internal training for auditors. REDcert supports the qualification and further training of the inspectors with annual **mandatory seminars**. The certification bodies are informed and trained in regular

informational events and training courses as well as with newsletters and memoranda on current issues and developments in the relevant areas. It is the responsibility of the certification body to appoint a **contact person** who disseminates this information in internal training sessions.

### 6.3.6 Participation in monitoring activities of the member states and the European Commission

Certification bodies that conduct audits under the REDcert-EU scheme must cooperate with the European Commission and the competent authorities of the Member States. This includes granting access to the premises of economic operators where requested as well as making available to the Commission and the competent authorities of the member states all information needed to fulfil their tasks under the Revised Directive (EU) 2018/2001.

For those purposes, certification bodies must also:

- a) provide the information needed by member states to supervise the operation of certification bodies pursuant to Article 30(9) of the Revised Directive (EU) 2018/2001
- b) provide the information required by the Commission to comply with Article 30(8) and Article 30(10) of the Revised Directive (EU) 2018/2001
- c) verify the accuracy and completeness of information entered into the Union database or relevant national database pursuant to Article 31a(5) of the Revised Directive (EU) 2018/2001

This includes:

- upon request of the competent authorities, the submission of all relevant information necessary to supervise the operation, including the exact date, time and location of audits,
- upon request of the European Commission, the submission of all relevant data to examine whether the sustainability and greenhouse gas emissions saving criteria in relation to a particular consignment are met,
- the granting of access to the premises of economic operators where requested,

making available to the Commission and the competent authorities of the member states all further information needed to fulfil their tasks under the Revised Directive (EU) 2018/2001.

## 7 Requirements of REDcert auditors

The auditors must be identified to REDcert by name, and they must provide proof that they fulfil the requirements below. **CVs together with references, confirmations and/or other relevant documents can serve as evidence of sufficient expertise, professional experience and experience as an auditor working at a certification body.** These are to be documented by the respective certification body, updated and provided to REDcert upon request. REDcert is authorised, particularly in the case of missing documents or insufficient qualification of the auditors, to reject the application for registration or to withdraw an existing approval.

To be appointed for an audit, the auditor must

- be independent of the activity being audited, except for audits concerning Article 29(6), point (a), and Article 29(7), point (a) of the Revised Directive (EU) 2018/2001, for which first or second party auditing may be carried out up to the first gathering point
- be free from conflict of interest

### 7.1 Training and qualification

The auditors must also have the following **special knowledge** needed to conduct audits/inspections related to the scheme criteria and the aspect of the scheme being inspected.

#### 7.1.1 Land-use criteria

Auditors who conduct audits in the REDcert-EU system to verify the land use criteria defined in Article 29(2-9) of the Revised Directive (EU) 2018/2001 must provide proof of experience in the field of agriculture, agronomy, ecology, natural science or a related field, including specific technical skills required to verify compliance with the criteria for highly biodiverse grassland.

### 7.1.2 Knowledge of GHG balancing

All auditors involved in GHG verification as part of an audit must demonstrate appropriate experience in GHG accounting (especially special knowledge of the GHG calculation methodology pursuant to the Revised Directive (EU) 2018/2001, for short: RED III). The knowledge needed for GHG balancing can be verified by, e.g. training or education certificates in the areas of process, energy and environmental technology, environmental engineering, environmental quality management, environmental process technology, regenerative energies, energy and environmental system technology and energy technology as well as special GHG training courses (including RED III GHG calculation methodology). Appropriate proof of the technical and professional expertise acquired in GHG accounting within the scope of the chosen training course must be provided.

At least two years of experience in **life cycle greenhouse gas emission assessment** and specific experience in **verifying GHG emission calculations using the REDII/REDIII calculation methodology**. Relevant experience depending on the type of audits to be carried out by the individual auditor. When verifying the soil organic carbon content for the purpose of applying the emission reduction credit for soil carbon accumulation ( $e_{sca}$ ) it should be noted that this requires specific **technical expertise** (e.g. soil science).

### 7.1.3 Inspections of farms

Auditors who perform inspections of farms have expertise in at least the following areas:

#### a) Knowledge of handling data sources and the analysis of geographic data

Completed training and education in the areas of agricultural sciences, geography, geographic sciences, geoinformatics, geoscience and environmental sciences are proof of knowledge in how to deal with data sources **such as, e.g. map material, GPS data, GIS data, satellite images**. Appropriate proof of the technical and professional expertise acquired to analyse geographic data and handle data sources within the scope of the chosen training course must be provided.

#### b) Soil knowledge

The required soil knowledge for **peatland identification**, assessment of the **degraded areas** or for further proof of soil-related requirement criteria of the

Revised Directive (EU) 2018/2001 can be documented by, e.g. completed training and education in the areas of agricultural sciences, soil science, geological sciences, geoecology, landscape ecology, environmental sciences. Appropriate proof of the technical and professional expertise acquired in soil evaluation within the scope of the chosen training course must be provided.

### c) **Biological and ecological knowledge**

The required knowledge on **species and biotope types** (e.g. types of grasslands, wetlands) native tree species and identification of the canopy cover can be verified by, e.g. completed training and education in the areas of biology, botany, ecology, forestry, landscape ecology, environmental sciences, provided that the technical and professional expertise can be demonstrated as part of the selected training path.

Verifying compliance with the “**protection of highly biodiverse grasslands**” criterion requires technical knowledge that goes beyond the knowledge that is generally expected from the auditors verifying the accuracy of the information provided by market operators (e.g. assessing whether grassland maintains the natural species composition as well as its ecological characteristics and processes and whether the grassland is species-rich).

Assessing whether grassland preserves the natural species composition and ecological characteristics and processes and whether grassland is species-rich can be performed by **experts** who have acquired a specific qualification for this purpose (e.g. in biology, ecology, botany, plant sociology, grassland science, site evaluation, ecosystems, site mapping, etc.). These experts must be external, independent of the activity being audited and free of conflicts of interest. The role of the expert is to establish whether a specific piece of land is, or in case of conversion, was highly biodiverse grassland on a case-by-case basis. An assessment of this kind does not need to be conducted annually. It is often sufficient to conduct a single assessment, e.g. if a piece of grassland is converted into cropland to grow agricultural raw materials.

Similarly, a qualified assessment by the auditor or an independent expert is required to ensure that proposed management practices do not pose a risk of declining grassland biodiversity.

When carrying out the neutral inspection, this means that a precautionary approach must be taken to assess whether or not the grassland was highly

biodiverse: “the role of the independent auditor is to establish whether an assessment was necessary, whether it came to the conclusion claimed by the operator and whether the expert that conducted the assessment fulfilled all requirements”<sup>7</sup>.

If an assessment is necessary, it must be conducted by a qualified independent expert who may be additional to the auditor. The evaluation and the result must then be checked as part of the inspection.

If harvesting in a non-natural species rich grassland is necessary to maintain status as highly biodiverse grassland, it must first be determined by a qualified independent expert who may be additional to the auditor. The evaluation and the result must then be checked as part of the inspection.

#### 7.1.4 Waste and residues

Auditors who perform inspections of producers/suppliers of residues and waste must have expertise in at least the following areas:

**a) Knowledge of handling data sources and registers**

Proof of knowledge in handling waste data **such as weighing data, register for non-hazardous waste, register for hazardous waste** (electronic verification procedure) is, for example, completed training in waste management or training in agricultural sciences, civil engineering or environmental sciences in connection with a proven waste management activity.

**b) Knowledge of waste management**

Appropriate expertise is required for the necessary assessment of waste and residues. The expertise requires at least knowledge of the **legal basis** for handling biomass from waste and residues, as well as operational implementation and application.

Proof of expertise can be provided as part of an initial training plan or through successful participation in a relevant course or through training in the fields of waste management, agricultural sciences, civil engineering or environmental sciences in connection with a proven waste management activity.

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<sup>7</sup> European Commission DG ENER: Letter to the voluntary certification schemes with guidance on how to demonstrate proof of the protection of high biodiversity grassland (29.01.2015).

### 7.1.5 Inspection of interfaces, warehouses and suppliers

Auditors who perform inspections of interfaces, storage sites and suppliers must have experience in mass balance systems, **supply chain logistics, bookkeeping, traceability and data** handling. Proof of the required knowledge can be provided by completed studies at a university or a technical college or a comparable qualification in the areas process technology, energy management, environmental engineering, environmental and quality management, environmental orientated process engineering and renewable energies.

### 7.1.6 Group certification

In addition to the above-mentioned requirements and expertise, REDcert expects auditors who are involved in group certification procedures to provide proof of experience in the form of at least 2 group audits within the last 24 months before applying for auditor approval.

## 7.2 Required knowledge, professional and practical experience as an auditor

<b>Special skills</b>	Audit methodology, communication skills, extensive knowledge of the legal requirements in the relevant area and of the REDcert scheme requirements
<b>Required qualification as an auditor</b>	Training (e.g. in accordance with ISO 19011) Duration: at least 24 hours (3 days)
<b>Professional experience</b>	At least 4 years of professional experience in the area to be inspected in a relevant position
<b>Practical experience as an auditor</b>	At least 5 audits/inspections in the last 2 years in the inspected area (e.g. ISO, EfbV, EMAS, GMP, QS, SURE, ISCC), including group audits, if applicable.



### 7.2.1 Training and performance review of certification body staff

The staff of a certification body in the REDcert scheme must be trained before they can begin their activities in the scheme. This is done in the REDcert scheme through the train-the-trainer principle.

REDcert conducts this training for the individuals responsible for implementing the certification body's train-the-trainer principle.

However, this requires that the people responsible and certification bodies have successfully participated in the training courses offered by REDcert in keeping with the train-the-trainer principle. Part of the train-the-trainer courses held by REDcert is an examination to determine the success of the training.

All training and performance assessments of the qualified people responsible and certification bodies are documented.

The training certificate (type, duration, location and main contents of the training) may only be provided by the training organisation if the trainee is present for the entire duration of the course.

When new auditors apply, they must provide the training certificate.

### 7.2.2 Initial training before starting work

Candidate auditors carrying out activities under the Revised Directive (EU) 2018/2001 for the first time must demonstrate the required expertise acquired through education and training in an examination prior to being approved as an auditor in the REDcert scheme.

An overview of the initial training and the different exam requirements for certification staff is provided in the training matrix below.

Certification staff	Initial training	Mandatory performance assessment
		Examination
Auditor candidates	X	X
Staff of the certification body <sup>8</sup>	X	-

The qualification of auditors who can provide evidence that they have already carried out audits under a voluntary scheme recognised by the European Commission with a scope equivalent to the REDcertEU scheme, e.g. SURE EU under the Revised Directive (EU) 2018/20, is considered to be sufficiently proven by monitoring the voluntary scheme and the competent authorities. Another exam to demonstrate qualifications is therefore not required in the REDcertEU scheme.

In addition, certification bodies have the freedom to conduct an audit on a voluntary basis for staff members of the certification body who do not work as auditors.

### 7.2.3 Further training to maintain a high level of expertise

After the auditors are initially approved, **regular** participation – at least once a year – in training for the REDcert scheme is mandatory. The training courses are either offered and conducted by REDcert or, after consultation on content and scope, by **qualified individuals responsible for implementing the certification body's "train-the-trainer principle"** who have passed a successful REDcert train-the-trainer training course.

The certification body is required to ensure that the certification staff maintains a high level of expertise about the voluntary scheme through regular training.

The training requirements and training content arise, among other things, from adjustments to the certification scheme as a result of the following changes:

- changes in the legal framework
- clarifications or notifications from the European Commission

<sup>8</sup> to the extent they are involved handling certification procedures under the REDcert scheme

- findings from the annual harmonisation meeting of the certification bodies
- corrective and/or improvement measures as a result of complaints or assessments by the accrediting body

The certification body is responsible for the organisation, implementation and evaluation of further training measures. REDcert can also provide and conduct additional training.

REDcert informs the certification bodies by newsletter, e-mail or other suitable communication channels about changes and key developments in the certification scheme.

REDcert reserves the right to request documentation on participants, content, duration and performance assessment from the qualified people responsible and certification bodies.

The **topics covered in training** include the following areas:

- content of the relevant legislation
- content of the scheme documentation in REDcert-EU scheme
- content and use of the REDcert-EU checklists for neutral inspections
- requirements for verifying criteria
- reporting requirements to the scheme operator
- practical questions about inspections and the REDcertEU scheme
- workshops to categorise non-conformities and guarantee consensus
- harmonisation of assessment practices to guarantee consensus
- review of the knowledge gained as performance assessment

#### 7.2.4 Carrying out initial exams

The scope and content of the mandatory initial exams are defined by REDcert. The initial exams are organised and conducted by a trainer who has been successfully trained by REDcert through the certification body. In exceptional cases, the exam can also be carried out online once this is confirmed by REDcert. The certification body informs REDcert well in advance of the date of the exam and the names of the people who will take the exam.

Since the training is organised and held in-house, certification bodies can manage exams flexibly and cost-effectively in line with requirements.

The exam questions must be answered by the person taking the exam within a certain period of time. The exam ends without exception after the specified period time has elapsed. The exam documents are then evaluated by REDcert.

#### 7.2.5 Monitoring the exam process

As part of internal monitoring, REDcert ensures that

- the requirements for content and time period are satisfied, and
- any misconduct (in particular disruptions and attempts at fraud, ban on recordings of any kind)

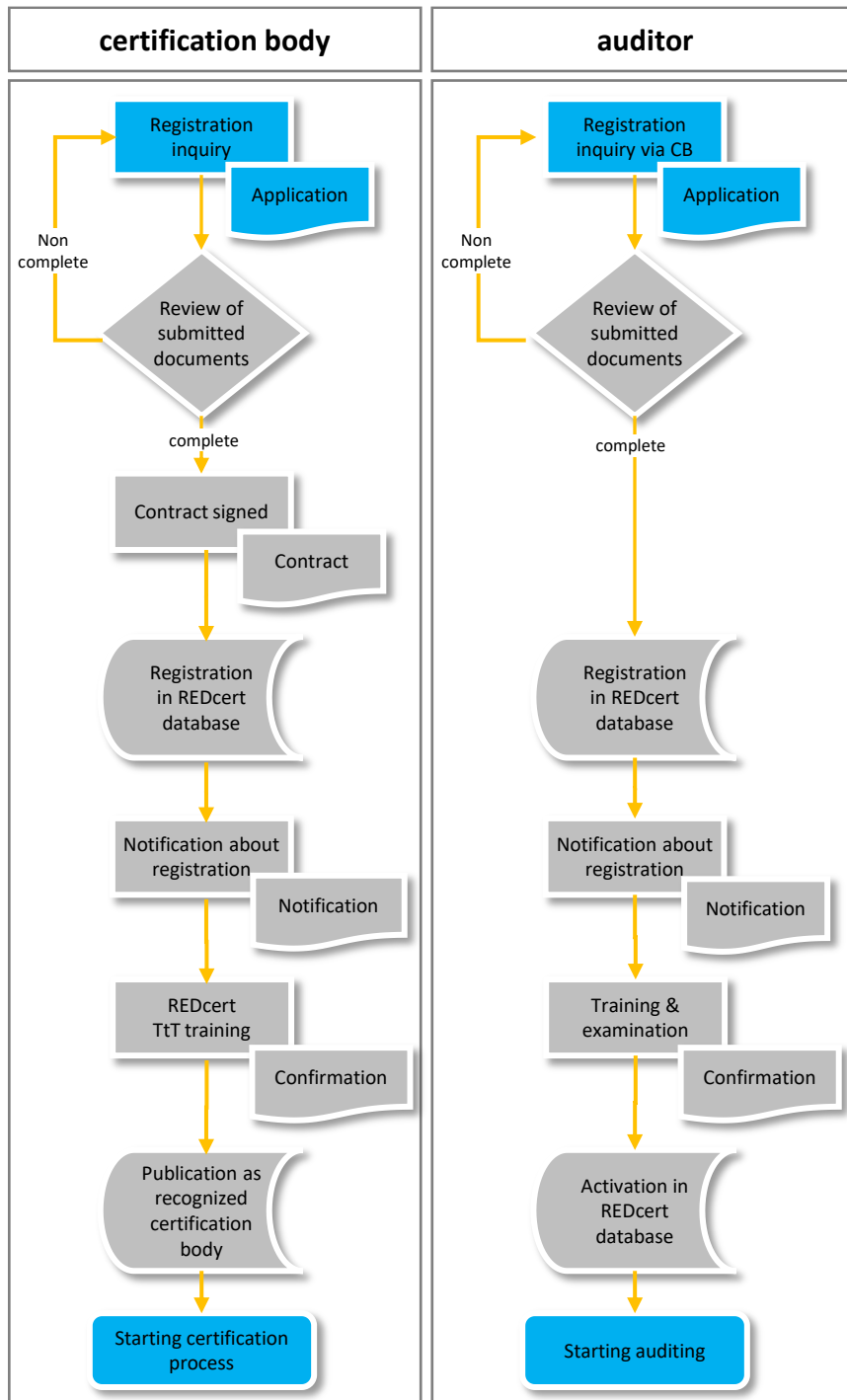
has consequences, for example by having a representative from REDcert oversee the online exams.

The certification body must confirm that the exam has been properly carried out with the signature of the trainer.

## 8 Registration process

The figure below shows the registration processes for the certification bodies and the auditors. Please see **section 5** and **section 6** for information about the skills necessary for successful registration. Please see **section 7.1** for information on the documents required for registration.

Figure 1: REDcert registration processes for certification bodies and auditors



## 8.1 Relevant documents

### 8.1.1 Registering a scheme partner

See REDcert scheme principles "*Scope and basic scheme requirements*".

### 8.1.2 Registering a certification body

The following documents are distributed upon request or after completing the respective REDcert registration process:

#### **a) Application for registration of a certification body in the REDcert scheme**

The application includes questions in compressed form about information on what is expected from REDcert certification bodies formulated under section 5 "Requirements and responsibilities of certification bodies". It must be sent by the certification body submitting the application **together with the sample documentation** listed here to REDcert in electronic format. Application and documentation are subject to a review process at REDcert. If the information submitted by the certification body does not fulfil the REDcert requirements, the registration process is interrupted to clarify any questions. If the information submitted by the certification body meets the requirements, REDcert sends the master agreement to the certification body.

#### **b) Master agreement for neutral inspections in the REDcert scheme**

The master agreement governs the prerequisites for certification bodies in the REDcert scheme and the certification procedures for REDcert scheme participants. When this contract is signed, the **certification body is recognised by REDcert and registered in the REDcert database** (access-restricted area of the REDcert certification portal). The data registered here must be kept up-to-date by the certification body. REDcert must be informed if this information changes.

#### **c) Notification of certification body registration in the REDcert scheme**

With the registration notification, REDcert sends all of the **documents and information necessary for REDcert certification** to the certification body.

#### **d) Confirmation of participation in the REDcert train-the-trainer training**

REDcert conducts train-the-trainer training sessions for the certification bodies. In these sessions, the people responsible at the certification body for the "train-the-trainer"

principle are given extensive information that makes it possible for the certification bodies to begin their certification activities under the REDcert scheme. **Participation in a train-the-trainer training session is mandatory before the** certification body begins its certification activities. Training is documented by a participation certificate from REDcert that REDcert keeps on file.

### 8.1.3 Registering an auditor

The following documents are distributed upon request or after completing the respective REDcert registration process:

#### a) Application for registration of an auditor in the REDcert scheme

The application includes questions in compressed form about information on what is expected from REDcert auditors formulated under section 6 "Requirements and responsibilities of REDcert auditors". It must be sent by the certification body submitting the application **together with the sample documentation** listed here to REDcert in electronic format. Application and documentation are subject to a review process at REDcert. If the information submitted does not meet the qualifications required by REDcert, the registration process is interrupted to clarify any questions. If the information submitted meets the qualifications required by REDcert, REDcert sends a notification of registration of an auditor including the scope registered for the auditor in the REDcertEU scheme.

#### b) Notification of registration of an auditor in the REDcert scheme

When this registration notification is sent, the auditor is **recognised by REDcert and registered in the REDcert database** (access-restricted area of the REDcert certification portal). REDcert must be informed of any changes affecting the registered auditor in question.

#### c) Expanding the auditor's scope

Registered auditors also need REDcert's consent to expand the scope of their audits. For this purpose, the responsible certification body submits an **application to REDcert including relevant documents and proof** of the qualification/skills of the auditor in question.

## 9 REDcert integrity and quality assurance measures

REDcert undertakes a number of measures to monitor scheme integrity and guarantee the quality of inspections as well as compliance with the scheme requirements. These include both preventative measures to assure the defined quality requirements as well as inspection measures that reflect the degree of fulfilment and serve as a basis for the continued further development and improvement of the REDcert scheme. REDcert integrity management is described in the **Scheme principles for integrity management**. The structure of the REDcert integrity management system is shown in the figure below.

Figure 2: REDcert integrity management system





## 10 Relevant documents

The documentation structure of the REDcert-EU scheme includes the following:

No.	Document	Published/Revised
1	Scope and basic scheme requirements	The current version of the REDcert-EU scheme principles is published on the website at <a href="http://www.redcert.org">www.redcert.org</a> .
2	Scheme principles for the production of biomass, bioliquids and biofuels	
3	Scheme principles for GHG calculation	
4	Scheme principles for mass balance	
5	Scheme principles for neutral inspections	
6	Scheme principles for integrity management	
7	Scheme principles for the production of RFNBO and RCF	
8	Phase-specific checklists	
9	Definitions in the REDcert-EU scheme	
Revised Directive (EU) 2018/2001. Available via: <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02018L2001-20240716">https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02018L2001-20240716</a>		

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

The legal EU regulations and provisions for sustainable biomass as well as biofuels, bioliquids and biomass fuels including other relevant references that represent the basis of the REDcert-EU documentation are published separately on REDcert's website at [www.redcert.org](http://www.redcert.org). When legal regulations are referenced, the most current version is always assumed.

## 11 Revision information for Version EU 07

Section	Change
General	Directive (EU) 2018/2001 has been changed to Revised Directive (EU) 2018/2001
3.1.1	<p>Scheme audits</p> <p><b>Added: Footnote 1 &amp; 5</b></p> <p>A "limited assurance level" implies a reduction in risk to an acceptable level as the basis for a negative form of expression by the inspector such as "based on our assessment nothing has come to our attention to cause us to believe that there are errors in the evidence", whereas a "reasonable assurance level" implies a reduction in risk to an acceptably low level as the basis for a positive form of expression such as "based on our assessment, the evidence is free from material misstatement". (see ISEA 3000)</p>
3.4	<p>A mandatory surveillance audit must be carried out of the collector and supplier within a six-week period before the expiry of 6 months from the initial certification.</p> <p><b>Changed to:</b></p> <p>A mandatory surveillance audit must be carried out by the corresponding certification body of the collector and supplier after 6 months after the initial certification (for the second mass balance period).</p>
3.5.1	<p><b>"Major" non-conformities of REDcert criteria are non-conformities that:</b></p> <p>systematic problems with the mass balance or GHG data reported for example, incorrect documentation is identified in more than 10% of the claims included in the representative sample</p> <p>failure of an economic operator to declare participation in other voluntary schemes during the certification process</p> <ul style="list-style-type: none"> <li>➤ failure to provide relevant information to auditors for example, mass balance data and audit reports</li> </ul> <p><b>Example:</b> failure to submit mass balance data, current GHG calculations or audit reports before the audit</p>

	<p><b>Changed to:</b></p> <p><b>“Major” non-conformities of REDcert criteria are non-conformities that:</b></p> <p>constitute a failure to comply with a mandatory requirement of the Revised Directive (EU) 2018/2001, where the non-conformity is potentially reversible, repeated and reveals systematic problems, or aspects that alone, or in combination with further non-conformities, may result in a fundamental system failure, shall be considered to be a major non-conformity.</p> <p><b>Examples:</b></p> <ul style="list-style-type: none"> <li>➤ systematic problems with the mass balance or GHG data reported for example, incorrect documentation is identified in more than 10% of the claims included in the representative sample</li> <li>➤ failure of an economic operator to declare participation in other voluntary schemes during the certification process</li> <li>➤ failure to provide relevant information to auditors for example, mass balance data .and audit reports</li> </ul>
3.5.1	<p><b>Added:</b></p> <p>The intentional violation of a voluntary scheme’s standards such as fraud, irreversible non-conformity, or a violation that jeopardies the integrity of the voluntary scheme shall be considered to be a critical non-conformity.</p>
3.5.2	<p><b>Corrective measures, time periods and impacts</b></p> <p><b>Criteria evaluated as critical</b></p> <p>failure to comply with any of these criteria results in suspension or withdrawal of the certificate and triggers sanction proceedings (except for an initial audit)</p> <p><b>Changed to:</b></p> <p>Withdrawal of the existing certificate if the deadline for implementing measures of 30 days has been exceeded.</p>

	<p><b>Criterion defined as KO</b></p> <p>failure to comply with any of these criteria results in suspension or withdrawal of the certificate and triggers sanction proceedings (except for an initial audit)</p> <p><b>Changed to:</b></p> <p>Failure to comply with any of these criteria may result in a review of the certification status and, where appropriate, corrective action. This may include a temporary suspension or, in serious cases, withdrawal of the certificate. However, an initial audit will first identify opportunities for improvement</p> <p>When a certificate is suspended, scheme participants may NOT identify biomass as sustainable.</p> <p><b>Changed to:</b></p> <p><b>During the suspension of a certificate, system participants may NOT declare biomass as sustainable.</b></p> <p><b>Added:</b></p> <p>Agricultural companies whose <b>self-declaration has expired, and which have been excluded from a group due to critical non-conformities (KO)</b> can only claim sustainability <b>once a new audit has been carried out</b>. The new audit takes place as part of the re-certification of the group for which a valid self-declaration was previously submitted.</p> <p>If a farm has been excluded from a group, it is <b>obliged to disclose</b> this when submitting another self-declaration <b>to a different group manager</b>.</p> <p>Different group managers <b>can refuse to accept a corresponding self-declaration for a period of at least two years</b>.</p>
3.6	<p><b>Added:</b></p> <p>This may be done by digital signature or by means of manual signature on the first page of the audit report (cover sheet).</p>

<p>5.4.1</p>	<p>The sample size increases if a threshold of unsuccessful inspections is exceeded (see section 5.6)</p> <p><b>If a valid certification for the REDcert scheme exists, the following is required for the initial inspection when changing to another REDcert scheme (e.g. from DE to EU):</b></p> <ul style="list-style-type: none"> <li>➤ the list of suppliers from the last REDcert audit forms the basis for the sample, as long as the schemes have a similar structure.</li> <li>➤ In the case of a re-certification audit, the two items above – the list of suppliers from the previous audit along with the currently signed self-declarations – determine the sample size.</li> </ul> <p>If the number of signed self-declarations is different from the number of suppliers in the list for the previous audit, the larger number must be used.</p> <p><b>Changed to:</b></p> <p>The sample size increases if a threshold of failed inspections is exceeded (see section 5.6)</p> <p><b>If a valid certification for another EU voluntary scheme exists, the following is required for the initial inspection when changing to the REDcert EU scheme:</b></p> <ul style="list-style-type: none"> <li>➤ the list of suppliers from the last certification audit forms the basis for the sample, as long as the schemes have a similar structure.</li> <li>➤ In the case of a re-certification audit, the two items above – the list of suppliers from the previous certification audit under another EU voluntary scheme, along with the currently signed self-declarations under the REDcert-EU scheme – determine the sample size.</li> </ul> <p>If the number of signed self-declarations is different from the number of suppliers in the list for the previous audit, the larger number must be used.</p> <p>Waste producers that supply</p> <ul style="list-style-type: none"> <li>➤ <b>more than 5 tonnes</b> of waste or residues a month (annual average) must be inspected on site by way of random sampling (<math>\sqrt{x}</math> where x is the number of sites)</li> </ul>
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	<p>➤ <b>less than 5 tonnes</b> of waste or residues do not generally need to be inspected on site. However, risk-based inspection of these waste producers is still possible.</p> <p><b>Changed to:</b> Waste producers that supply</p> <p>➤ <b>more than 5 tonnes</b> of waste or residues a month (annual average) of waste or residue listed in part A and B of Annex IX to Directive (EU) 2018/2001 must be inspected <b>on-site</b> by way of random sampling (<math>\sqrt{x}</math> where x is the number of sites)</p> <p>➤ <b>less than 5 tonnes</b> of waste or residues do not generally need to be inspected on site. However, risk-based inspection of these waste producers is still possible.</p>
5.4.1.	<p>Sample size</p> <p>[ ] The number of signed self-declarations before the initial inspection is used to define the sample size.</p> <p><b>Changed to:</b> The number of signed self-declarations at the time the sample is determining the sample.</p>
5.5.2	<p><b>Added:</b></p> <p>➤ For materials as listed in Annex IX, Part A and Part B of the Revised Directive (EU) 2018/2001 may qualify as waste or residues. However, only the fact that materials are listed does not automatically mean that they are waste or residues. Raw materials listed in Annex IX Part A and Part B can be regarded as products, by-products, waste or residues. The classification of the raw material shall be determined according to the REDcert guidelines of the "Scheme principles for the production of biomass, biofuels, bioliquids and biomass fuels" chapter 5.</p> <p>➤ Waste and residues do not need to prove compliance with land-related sustainability criteria.</p>

	<p><b>Changed to:</b></p> <ul style="list-style-type: none"> <li>➤ Waste and residues other than agriculture, aquaculture fisheries and forestry residues, do not need to prove compliance with land-related sustainability criteria set out in Article 29(3-7) of the Revised Directive (EU) 2018/2001.</li> </ul>
5.6	<p>If at least 1/3 of the sites inspected do not meet the scheme requirements or a major nonconformity has been found, the sample size of the inspections must be doubled (<math>2 \times \sqrt{x}</math>, where x is the number of sites).</p> <p><b>Changed to:</b></p> <ul style="list-style-type: none"> <li>➤ Exclusion and extension of the sample</li> <li>➤ Whenever a farm fails the inspection due to one or more critical non-conformities (KO), or due to non-fulfilment of the requirements (<math>&lt; 75\%</math>), this farm must be excluded from the group immediately (see section 5.6. Thresholds for failed random sample inspections).</li> <li>➤ In order to guarantee the originally sample size, additional farms must be included in the inspection. This increases the total number of farms inspected to <math>\sqrt{x} + n</math>, where n is the number of farms where a critical non-conformity (KO) was detected. The risk-based sampling criteria continue to apply when selecting these additional farms.</li> <li>➤ Doubling the scope of inspection</li> <li>➤ A doubling of the inspection sample (to <math>2 \times \sqrt{x} + n</math>, where x is the number of farms from the original sample and n is the number of farms in which a critical deviation (KO) was detected) is required if at least one of the following cases occurs:             <ul style="list-style-type: none"> <li>➤ 1. more than one third of the inspected farms are excluded from the group (<math>n \geq 1/3 x</math>) because they do not fulfil the system requirements (degree of fulfilment <math>&lt; 75\%</math>).</li> <li>➤ 2. at least one critical non-conformity (KO) was detected in the inspected farm.</li> </ul> </li> </ul> <p>If cases 1) or 2) apply and lead to the exclusion of more than one third of the farms inspected, the sample must be doubled in accordance with the above rule.</p>

	<p>If at least 1/3 of the sites inspected do not meet the scheme requirements, the size of the inspections must be doubled again.</p> <p><b>Changed to:</b></p> <p>If at least 1/3 of the inspected farms from the second sample that do not fulfil the system requirements (degree of fulfilment &lt;75%) are found to have one or more critical non-conformities (KO), the scope must be doubled again.</p> <p><b>Added:</b></p> <p>[...] Companies removed from the group as a result of critical non-conformities (KO) must be recorded by the group manager in an appropriate manner and must be reported to the certification body as part of the re-certification process. These companies must be clearly labelled on the list of companies with a valid self-declaration. This list must be made available to the certification body without request.</p> <p>[...] A valid and consistent self-declaration must be submitted beforehand.</p> <p>Group members who do not meet critical REDcert requirements (KO evaluation) must be excluded from the group and from REDcert certification.</p> <p><b>Changed to:</b></p> <p>Group members who do not fulfil the important REDcert requirements (serious non-conformity or &lt; 75% of the fulfilment points) must be excluded from the group and from the current REDcert certification.</p>
6.3.2	<p><b>Deleted:</b></p> <ul style="list-style-type: none"> <li>➤ establishes at least a "limited assurance level" in the nature and complexity of the economic operator's activities</li> </ul> <p><b>Deleted:</b></p> <p>Footnote 5: A "limited assurance level" implies a reduction in risk to an acceptable level as the basis for a negative form of expression by the</p>



	<p>inspector such as “based on our assessment nothing has come to our attention to cause us to believe that there are errors in the evidence”, whereas a “reasonable assurance level” implies a reduction in risk to an acceptably low level as the basis for a positive form of expression such as “based on our assessment, the evidence is free from material misstatement”. (see ISEA 3000)</p> <p><b>Added:</b></p> <p>Auditors shall focus to take establish an appropriate risk level, depending on the type of the audit and the risk profile of the economic operator. The assurance level shall be addressed as follows:</p> <ul style="list-style-type: none"> <li>➤ The <b>initial audit</b> of a <b>new scheme participant</b> or a <b>re-certification</b> of <b>existing scheme participant</b> under a revised regulatory framework shall <b>always be on-site</b> and shall as a minimum provide <b><u>reasonable assurance</u></b> on the effectiveness of its internal process.</li> <li>➤ Depending on the <b>risk profile</b> of the economic operator, a <b><u>limited assurance</u></b> level can be applied on the veracity of its statements. <u>On the basis of the results of the initial audit</u>, those economic operators who are considered low risk may be subject to <b>subsequent limited assurance</b> audits.</li> </ul>
6.3.2	<p><b>Reinstated:</b></p> <ul style="list-style-type: none"> <li>➤ establishes at least a “limited assurance level” in the nature and complexity of the economic operator’s activities</li> </ul> <p><b>Reinstated:</b></p> <p>Footnote 5: A “limited assurance level” implies a reduction in risk to an acceptable level as the basis for a negative form of expression by the inspector such as “based on our assessment nothing has come to our attention to cause us to believe that there are errors in the evidence”, whereas a “reasonable assurance level” implies a reduction in risk to an acceptably low level as the basis for a positive form of expression such as</p>

	"based on our assessment, the evidence is free from material misstatement". (see ISEA 3000)
6.3.6.	<p>verify the accuracy and completeness of information entered into the Union database or relevant national database pursuant to Article 28(4) of the Revised Directive (EU) 2018/2001</p> <p><b>Changed to:</b></p> <p>verify the accuracy and completeness of information entered into the Union database or relevant national database pursuant to Article 31a(5) of the Revised Directive (EU) 2018/2001</p>
7.2.1.	<p>[...] Part of the train-the-trainer courses held by REDcert is an exam to determine whether the training has been successful.</p> <p><b>Changed to:</b></p> <p>[...] Part of the train-the-trainer courses held by REDcert is an examination to determine the success of the training.</p>
7.2.5	<b>Deleted:</b> 7.2.5 Results of the exam
7.2.6	<b>Deleted:</b> 7.2.6 Conducting witness audits

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