

Complaint Management REDcert-EU scheme

Version 1

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A “complaint” is a statement by an interested party that expresses dissatisfaction and is linked to a claim against the scheme operator. Systematic documentation and complaint management contributes to the sound integrity and quality of the REDcert-EU scheme.

A prerequisite for the investigation of a complaint is objective evidence and as comprehensive and concrete information as possible. A complaint based solely on hearsay or rumor is not sufficient for further investigation by REDcert. The complaint must be sent in writing, including all verifiable information, to the office of REDcert GmbH, clearly marked as a complain via [post](#) or e-mail. Further contact data can be found on the REDcert website <https://www.redcert.org/en/contact.html>.

Complaints are directed against decisions/conclusions of the scheme operator or its certification bodies which, in the complaint initiator’s view, are inconsistent with alleged scheme violations or vulnerabilities. Specifically, this can be negative feedback on REDcert inspections, audit reports, REDcert certificates or other facts. REDcert has set up a complaint management system for this purpose.

Every complaint directed at REDcert is accepted, analysed and tracked as shown in Figure 1. The complaint process is confidential in principle, i.e. neither the complaint initiator nor the affected party or parties named in the complaint are disclosed to third parties during the pending proceedings by the scheme operator, unless required by law, for example to the competent authorities. The individual steps in the complaint process are carefully documented by the scheme operator.

The person who initiates the complaint – as long as the complaint was not submitted anonymously – as well as any other parties involved (e.g. competent authorities or the European Commission) are informed of the results of the complaint investigations.

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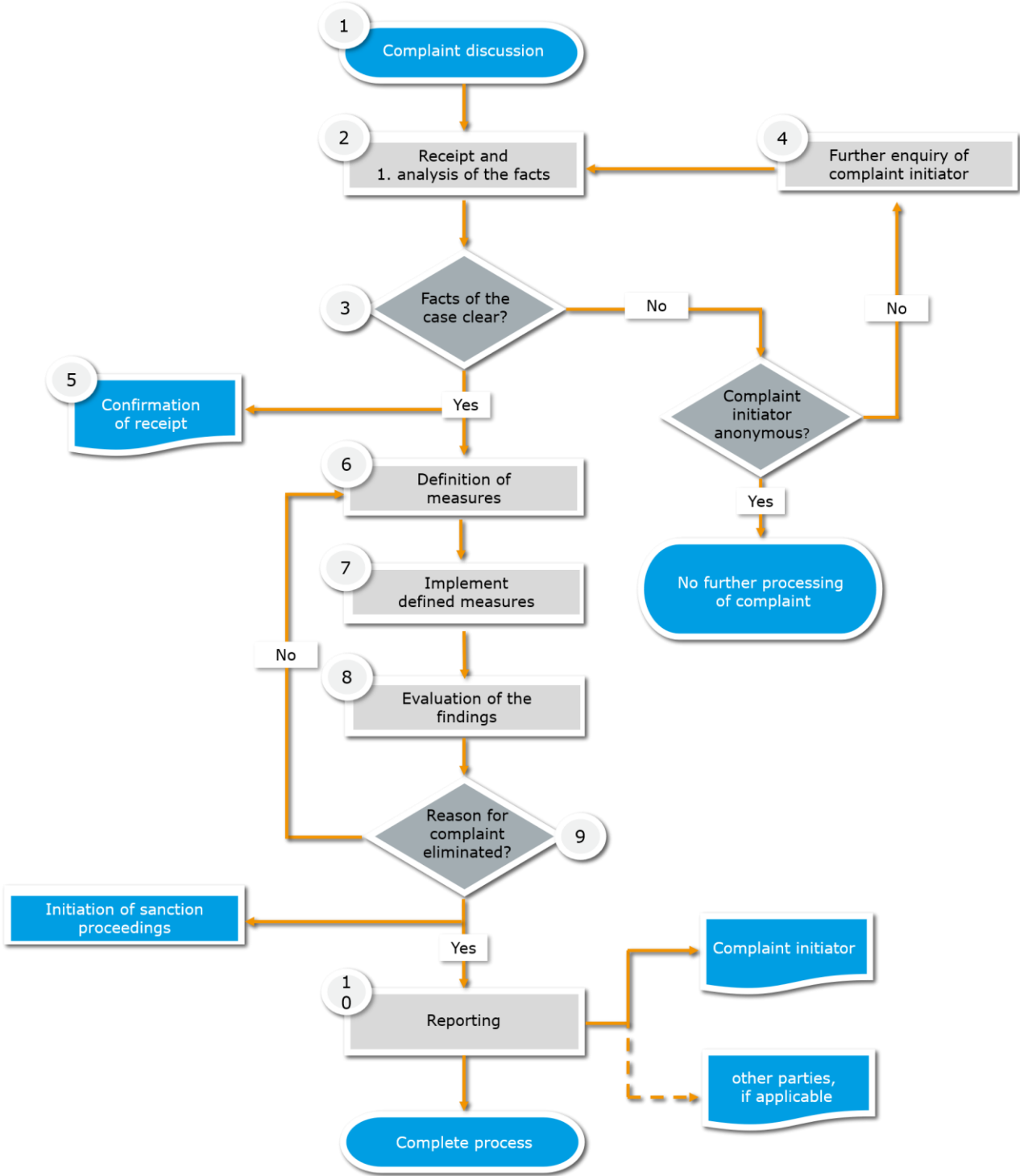
Complaints are inadmissible, if

- the requirements as to form and content are not met. This includes complaints and appeals that are not adequately supported by objective and sufficient evidence necessary to gain a clear understanding of the situation at hand.
- the complaint seeks adjustments to the recognised REDcert-EU scheme.
- the complaint seeks to modify sanctions imposed by REDcert for violations or infractions of REDcert requirements.
- the reason for the complaint does not explicitly relate to REDcert GmbH or to activities carried out under REDcert.

Where serious scheme violations are found as a result of a complaint procedure, they are followed up in the same way as the REDcert scheme audits under the sanctions management system (see section 5, REDcert-EU scheme principles “Integrity Management”).

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Complaint procedure in the REDcert-EU scheme (Fig. 1)



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The workflow shown in the diagram above looks as follows in detail:

- ① The following **communication channels** are available to complaint initiator to submit his complaint to the scheme operator: e-mail, fax, letter by post. Most importantly, we would like to once again stress the possibility of contacting us anonymously via the REDcert website.
- ② The scheme operator decides whether the submission meets the definition of a complaint. If so, he documents **receipt of the complaint** and creates a corresponding progress report in which all other measures or events related to the complaint are entered chronologically and are linked with the relevant information and supporting documents.

As part of an **initial analysis of the complaint**, the following is systematically determined and documented:

- the complaint initiator (incl. contact data, if known)
 - the reason for the complaint (information on the companies involved, types and quantities of biomass or biofuels/bioliquids/biomass fuels, time periods and other details)
 - possible causes of the complaint (as long as this can be determined with certainty at that time)
 - potential magnitude of the complaint with respect to the integrity of the REDcert scheme
 - possible conflicts of interest (if known)
- ③ The analysis examines and documents whether the complaint submitted is so significant with regard to the above criteria that further action must be taken.
 - ④ If the **complaint is not sufficiently clear**, the complaint initiator is contacted and an attempt is made to obtain the missing information from the perspective of the complaint initiator. If the complaint was submitted anonymously and cannot be further clarified because there is no contact person, the complaint process usually ends at this point.
 - ⑤ If the **complaint is sufficiently substantive and convincing**, the complaint initiator – if known – will receive a letter within five working days confirming receipt of the complaint and

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assuring him that the complaint will be further investigated and that information on its progress will be provided.

- ⑥ The scheme operator determines **measures** to permanently eliminate the reason for the complaint and its causes.
- ⑦ The reason for the complaint must be explained and eliminated by the person in question (e.g. scheme participant or certification body).
- ⑧ The scheme operator reviews the **complaints** of the complaint initiator or directly checks the implementation and effectiveness of the measures specified by the person or identified by the scheme operator.
- ⑨ If the assessment of the effectiveness of the measures (e.g. result of another inspection) is not satisfactory, a new **cycle of measures** (see ⑥) is initiated in accordance with the PDCA cycle (Plan-Do-Check-Act) until the cause of complaint has been permanently eliminated.
- ⑩ Before the complaint procedure is concluded, a **summary report** is created.