

Waste producers, storage and transshipment sites outside the EU

Explanations for inspection

Information sheet on the inspection of waste producers, storage and transshipment sites outside the EU

Introduction

Biofuels and bioliquids from waste and residual materials perform better in greenhouse gas calculations than farmed biomass because their life cycle emissions can be assumed to be “zero” up to the point of collection. These benefits on the market for biofuels and bioliquids, however, also mean that there is a greater risk of misuse and unfair advantage. As a result, REDcert created additional requirements beyond the legal requirements for the collection and gathering of waste and residual materials as well as for the verification of this attribute. When importing waste and residual materials from non-EU member states, this is expressed, for example, in the form of more intensive inspection of waste producers and storage and transshipment sites.

Documented verification

Collectors for whom waste and residual materials from non-EU Member States are recorded for further processing in the biofuel and bioliquid chain must ensure that the biomass they receive as waste and residual materials from waste producers from non-EU Member States is correctly declared in accordance with Communication from the European Commission 2010/C 160/02 Section 5.2.

Waste producers that supply waste or residual materials to collection, treatment and/or processing operations must always confirm to the recipient that the supplied waste or residual material is only biomass as defined by Directive 2009/28/EC. To this end, the REDcert form “Self-declaration for the supply of waste and residual materials for biofuel production” should be filled out and provided to the biomass recipient.

This form is to be used for each individual delivery. If the deliveries were agreed on the basis of a contract or agreement, the contract or agreement number must be indicated on the self-declaration. The following information must also be provided at a minimum:

- ➔ the designation or waste code if applicable and, if relevant, the category for animal fats, etc.
- ➔ the process by which the waste and residual material is produced
- ➔ the country of origin of the waste and residual materials

The non-EU waste producer agrees by signing the self-declaration that inspectors of the recognised certification bodies of the REDcert scheme, REDcert auditors and authorised inspectors of the Federal Agency for Agriculture and Food (BLE), if a bilateral agreement exists for inspection with the country in question, can check whether the relevant requirements of Directive 2009/28/EC and the REDcert-EU system are complied with.

Proper documentation (document flow) of the deliveries is also mandatory to be able to track every quantity of waste and residual materials produced, e.g. through:

- collection slips
- disposal documents
- weighing slips
- delivery slips, etc.

Inspection of waste producers

Waste producers from non-EU member states are generally subject to inspection, i.e. these companies must always undergo an initial inspection before the first delivery. All subsequent inspections (as part of the recertification of the collector) will continue to be carried out on site at non-EU waste producers that supply more than 10 tonnes of waste or residual materials per month (annual average).

Waste producers that supply less than 10 tonnes of waste or residual materials per month do not all need to be inspected on site.

The operations to be inspected on site are selected on the basis of a random sample. The minimum number of operations for sample inspections is the square root of the total number of sites (\sqrt{y} where y is the number of operations) rounded up to the next whole number. The risk factors listed below serve as the basis for the sample inspections. A representative selection of the various companies must be inspected. The following order determines how the risk factors are weighted:

- a KO evaluation in the previous inspection
- operations that have not yet been included in the sample inspection
- the proximity to the threshold value of the annual tonnage
- the type of waste or residual material
- the type of waste producer,
- etc. (additional risk criteria at the discretion of the respective certification body)

The type of sample selection and the underlying risk criteria as well as their assessment must be documented by the certification body. Sample inspections can only be applied if the contractual basis on which the waste producer operates prevents incentives to make false claims about the type of waste and residual material. Waste producers to which sample inspections cannot be applied must be inspected individually.

If one of the inspected non-EU waste producers commits a serious violation, he is banned from supplying "biomass certified as sustainable" as well as certified residual materials to the collector. As part of re-certification of the collector, it is possible to include the waste producer in the supply chain again.

Inspection of storage and transshipment sites

The use of storage and transshipment sites in a non-EU member state by a collector/waste producer must be reported to the responsible certification body and is generally subject to inspection. The initial inspection, as well as any subsequent inspection, always takes place on site.

Transshipment sites are defined as sites where goods are only provided for transport, i.e.:

1. Short-term storage for transshipment purposes may not generally exceed 24 hours.
2. No mixtures or changes of any kind may be made to the container or the product itself at the transshipment site.

Storage sites for waste and residual materials, on the other hand, are, in the event of

- long-term storage (more than 24 hours)
- mixing/transfer of biomass from one container to another
- processing/treatment of the biomass supplied
- weighing of incoming biomass
- documentation of incoming and outgoing biomass

designated as operating sites and must be identified in the REDcert database as another site of the scheme participant to be certified.

In addition to the above requirements, the waste regulations relevant for the use of transshipment/storage sites must be observed.

The on-site inspections of the waste producers, storage or transshipment sites do not have to take place at the beginning of a collector's scheme inspection. These can also be carried out after the scheme inspection. However, a certificate for a collector of waste and residual materials can only be issued if appropriate inspections have been carried out in advance by the non-EU waste producers and/or the non-EU transshipment and storage sites.