



Scheme principles for integrity management

Version EU 03

© REDcert GmbH 2025

This document is publicly accessible at: www.redcert.org.

Our documents are protected by copyright and may not be modified. Nor may our documents or parts thereof be reproduced or copied without our consent.

Document title: "Scheme principles for integrity management"

Version: EU 03

Date: 29th of November 2024

Valid from: 21st of May 2025

The legally binding basis for certification under the REDcert-EU scheme is exclusively the current versions of the English-language documents published on the REDcert website at www.redcert.org.

Table of contents

1	REDcert integrity management	4
1.1	Transparency within the REDcert certification scheme	4
1.2	Structure of the REDcert integrity management system	5
1.2.1	Risk analysis	6
1.2.2	Monitoring	6
1.2.3	Preventive measures	8
1.2.4	Inspection measures	8
2	Management of scheme integrity	9
3	Compliance management system	11
4	Complaint management system	14
5	Sanction management system	19
6	Crisis management system	20
7	Measures	21
7.1	Measures to ensure scheme integrity	21
7.1.1	Transparency in scheme representation	21
7.1.2	Transparency in scheme membership	21
7.1.3	Transparency in scheme management	22
7.1.4	Transparency in certification	22
7.1.5	Assuring scheme integrity and preventing misuse and fraud	22
7.2	Measures to ensure scheme compliance	23
7.3	Measures to resolve complaints	23
7.4	Measures to sanction and remedy major non-conformities	24
7.5	Measures to ensure scheme integrity at certification bodies	28
8	Definitions	30
9	Relevant documents	31
10	Revision information for Version EU 03	32

1 REDcert integrity management

The integrity management system of REDcert the Gesellschaft zur Zertifizierung nachhaltiger Biomasse mbH (hereinafter: scheme operator or REDcert GmbH or REDcert) makes a direct contribution to strengthening and securing the REDcert-EU scheme as a certification scheme for implementing Revised Directive (EU) 2018/2001 (hereinafter: RED III). Integrity management in the REDcert-EU scheme is understood as the totality of all activities or measures that build confidence in the REDcert-EU scheme, its reliability, and its quality, by reporting and/or prosecuting non-scheme-compliant behaviour and by investigating other unwanted incidents.

This includes both the possibilities to evaluate individual requirements (degree of fulfilment) within the scheme as well as measures designed to promote transparency and acceptance vis-à-vis all interested parties.

The aim of the integrity management system is to achieve the best possible combination of oversight and accountability among stakeholders in the implementation of the scheme requirements, while maintaining confidence in the REDcert-EU scheme and the credibility of this certification scheme with all stakeholders.

1.1 Transparency within the REDcert certification scheme

Continuous improvement (e.g. in accordance with ISO 9000:2015-11) of the fulfilment of the basic scheme requirements affects not least of all the quality of verification by the scheme participant. These scheme requirements include:

- accessibility
- transparency/clarity
- traceability/plausibility
- protection against tampering
- credibility/reliability
- trustworthiness

To meet the transparency requirements of legislators, but even more importantly, our own standards for maintaining the integrity of the certification scheme, the scheme operator upholds different principles, for example:

- transparency in scheme representation
- transparency in scheme membership
- transparency in scheme management
- transparency in certification
- assuring scheme integrity and preventing scheme misuse and fraud
- continuous improvement

As a result of the outcomes of different measures that have been taken, such as prevention, monitoring, correction or sanctions, there are requirements or opportunities that the scheme operator takes into account when managing the REDcert-EU scheme. This ensures continuous improvement, among other things with regard to the suitability, adequacy and effectiveness of the certification scheme.

The measures that contribute to the transparency required by legislators are described in section 7.

1.2 Structure of the REDcert integrity management system

To **maintain scheme integrity**, the scheme operator has introduced sub-systems within the integrity management system, which are activated depending on the incident. For the scheme operator, this includes:

- the compliance management system (see section 3)
- the complaint management system (see section 4)
- the sanction management system (see section 5)



Figure 1: Structure of the REDcert integrity management system

In addition, the scheme operator has established effective activities within the REDcert certification scheme to reduce the risk potential for scheme irregularities, non-conformities, abuse, and fraud and to effectively counter comparable phenomena. These include:

- risk analyses
- monitoring activities
- preventive measures
- inspections

1.2.1 Risk analysis

A risk analysis generally includes all activities carried out to **assess, evaluate and prioritise risks**. The primary aim of risk analysis within the REDcert-EU scheme is to systematically identify and assess risks that could jeopardise the integrity of the certification scheme. The result of this analysis provides the basis for taking preventive, monitoring, corrective or even sanction measures, including their appropriate frequency and/or intensity. This enables REDcert to strengthen its monitoring and inspection activities to ensure implementation of the requirements of Revised Directive (EU) 2018/2001 and the scheme-specific requirements with the highest possible level of assurance.

1.2.2 Monitoring

The term "monitoring" is used in many contexts and means **"to keep track of"**. This term generally stands for all activities that aim to determine whether the interested parties in the REDcert-EU scheme conduct themselves with integrity.

In the REDcert-EU scheme, the term “monitoring” mainly refers to the collection and evaluation of information on compliance with the scheme requirements. It is a way to ensure system integrity.

The REDcert-EU scheme has an internal monitoring mechanism to verify that economic operators and auditors comply with the rules and procedures applied by the scheme. Internal monitoring is carried out continuously and reflects the level of risk of the activities conducted. The monitoring activities cover a random and risk-based sample. The certification bodies are required to submit all audit reports, and, where applicable, the calculations of actual values for the greenhouse gas emissions to REDcert.

The REDcert-EU scheme ensures effective follow up of the results of the internal monitoring and, where necessary, the application of sanctions. On the basis of the results of internal monitoring, corrective measures must be taken in order to improve the scheme’s functioning in the future. The results of the annual monitoring activities are summarised in the annual activity report submitted to the European Commission.

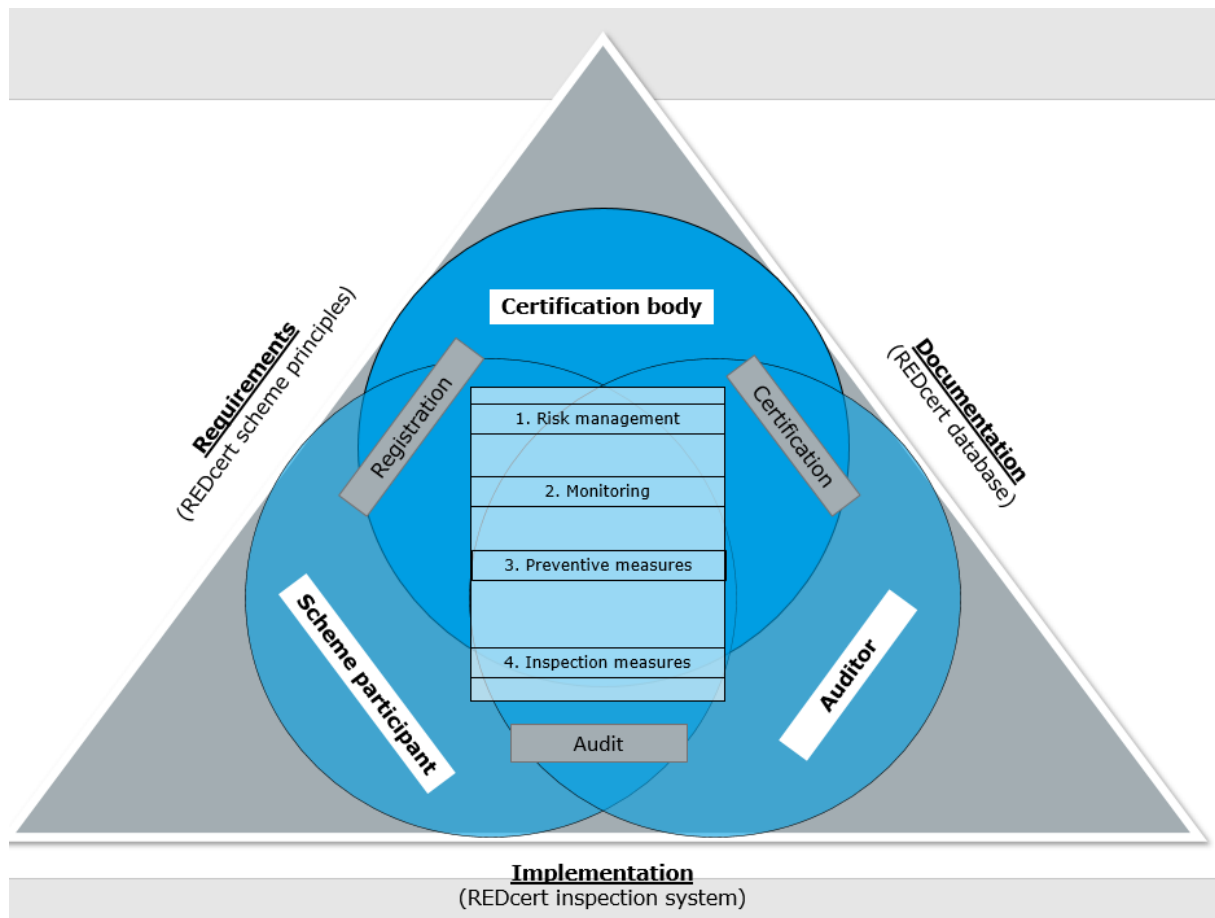


Figure 2: REDcert integrity management – monitoring model

1.2.3 Preventive measures

The scheme operator takes measures to prevent non-scheme-compliant conduct or activities, which are intended to prevent the occurrence of these or other undesirable incidents or even more so to systematically eliminate the cause of these incidents. Whether the preventive measure to be taken is appropriate or not is determined based on risk. The identification and assessment of unwanted incidents and any measures taken are documented.

This approach contributes to:

- maintaining the integrity of the REDcert-EU scheme
- preventing or reducing non-conformities that could jeopardise the certification scheme
- making improvements, for example related to scheme optimisation, its further development by the scheme operator and its proper implementation by the scheme users

1.2.4 Inspection measures

To ensure the sustainable production and use of biomass, all economic operators along the entire value chain must be inspected. Certification bodies approved and registered with the scheme operator perform inspections to determine **compliance with the scheme requirements** along the entire **production, processing and supply chain**. The following conditions must be met/created for the **inspection and certification** of an economic operator:

1. The economic operator has registered. (The monitoring measure here is to verify the information provided, particularly in relation to "other" certification and company renaming activities to prevent scheme hopping, which is the ultimate goal).
2. The economic operator has signed a scheme contract (this means that their data are entered in the REDcert database. This is the only way the economic operator is entitled to obtain a REDcert certification).

3. The economic operator has appointed a REDcert certification body to carry out REDcert-EU certification (The certification body sends a legally binding declaration to the scheme operator.).
4. The scheme operator expects that an economic operator interested in REDcert-EU certification has informed themselves about the scheme requirements they have to fulfil before the certification body carries out its inspection (audit; information on these requirements is available to the economic operator on the scheme operator's website).

The inspection and certification process comprises the following steps:

1. The commissioned certification body conducts the initial audit of the operation (on-site inspection and evaluation of the scheme requirements).
2. The certification body writes the audit report and saves it in the REDcert database.
3. The scheme operator spot checks the reports submitted.
4. The certification body issues the certificate of conformity (certificate or inspection certificate) and enters the certificate data in the REDcert database. All certificates of conformity are published at www.redcert.org.

2 Management of scheme integrity

The nature of the non-compliance with the requirements of the REDcert-EU scheme or the type of other unwanted incidents determines the entry into the relevant management sub-system of the integrity management system.



Figure 3: REDcert integrity management system – workflow of the individual sub-systems (start)

For example:

- **Tips** provided by, for example, national or international authorities and organisations, economic operators or certification bodies, as well as through REDcert internal monitoring activities are reviewed in the **compliance management system** (see section 3).
- **Complaints** from, for example national or international authorities and organisations, but also from economic operators or certification bodies are processed in the **complaint management system** (see section 4).
- **Non-conformities** found during audits are passed on to the **sanction management system** (see section 5).

Non-conformities in this context are **interface KOs**, whereby a KO of a producer or collector is an exception to this rule.

All entries must be made in writing for further processing and can be submitted anonymously to the scheme operator. A contact form is available for this purpose at www.redcert.org.

All incidents can be submitted via the following channels:

- by e-Mail to beschwerden@redcert.de
- by fax to +49 (0) 228 35060 80
- by post to the following address:

REDcert GmbH
Schwertberger Straße 16
53177 Bonn

All contact information is publicly available at www.redcert.org.

Complaints and appeals submitted to REDcert must meet the following criteria:

- The reason for the complaint or appeal is well-founded and not immaterial.
- The addressee of the complaint or appeal is REDcert GmbH.
- Complaints and appeals must be clearly identified as such.
- If the appeal or complaint is directed against the activities or decision of a certification body, all the complaint and appeal procedures of that certification body must first have been followed. Only when these procedures have been completed with a written decision can REDcert be contacted.

- Complaints and appeals must be submitted in writing and must include basic information about the reporting person, including name and organisation, in order to address any potential conflict of interest. If the reporting person intends to remain anonymous during the further process, the reporting person must indicate this at the time of submission and provide a reasonable explanation for this request.
- The submitted complaint or appeal must be accompanied by documentation that details the facts of the case in such a way that any impartial individual or party can form a clear picture and understanding of the situation at hand. The supporting documentation should include a summary of the issues, and the relevant stakeholders/parties involved.

All of the entry types mentioned above can result in monitoring, preventive, corrective and/or sanction measures (e.g. special audits or integrity assessments conducted by REDcert).

3 Compliance management system

The REDcert-EU certification scheme guarantees that sustainability certification under RED III is implemented in compliance with the law for the biomass of the entire production, processing and supply chain for biofuels, liquid biofuels and biomass fuels. In addition, the REDcert-EU scheme covers the entire value chain of renewable fuels of non-biological origin and recycled carbon fuels.

The inspections carried out as part of the certification process serve to **systematically monitor** all scheme participants and are the main tool for identifying scheme non-conformities.

The legal requirements can be broken down into the following groups/topics with regard to the **potential risk of possible non-compliance**:

- a) sustainability requirements for the production/collection of biomass and production of renewable fuels and recycled carbon fuels, taking into account applicable legal requirements and basic social standards
- b) requirements for the GHG emission saving and the calculation method
- c) requirements for the verifiable traceability and mass balancing for the continuous proof of (biomass) origin over the entire production and supply chain

In addition to these requirements, REDcert defines scheme requirements

- d) for the quality of the documentation and

- e) for the chain of custody, in particular for the monitoring and certification of the companies involved.

All of the above requirements are formulated in detail in the relevant scheme documents (REDCert-EU scheme principles).

REDCert has established processes that serve to promote scheme transparency and thus ensure compliance. The two diagrams below show examples of the processes involved in the preventive measures to be taken when a potential scheme participant or a potential certification body becomes affiliated with the scheme (e.g. to prevent any "scheme hopping").

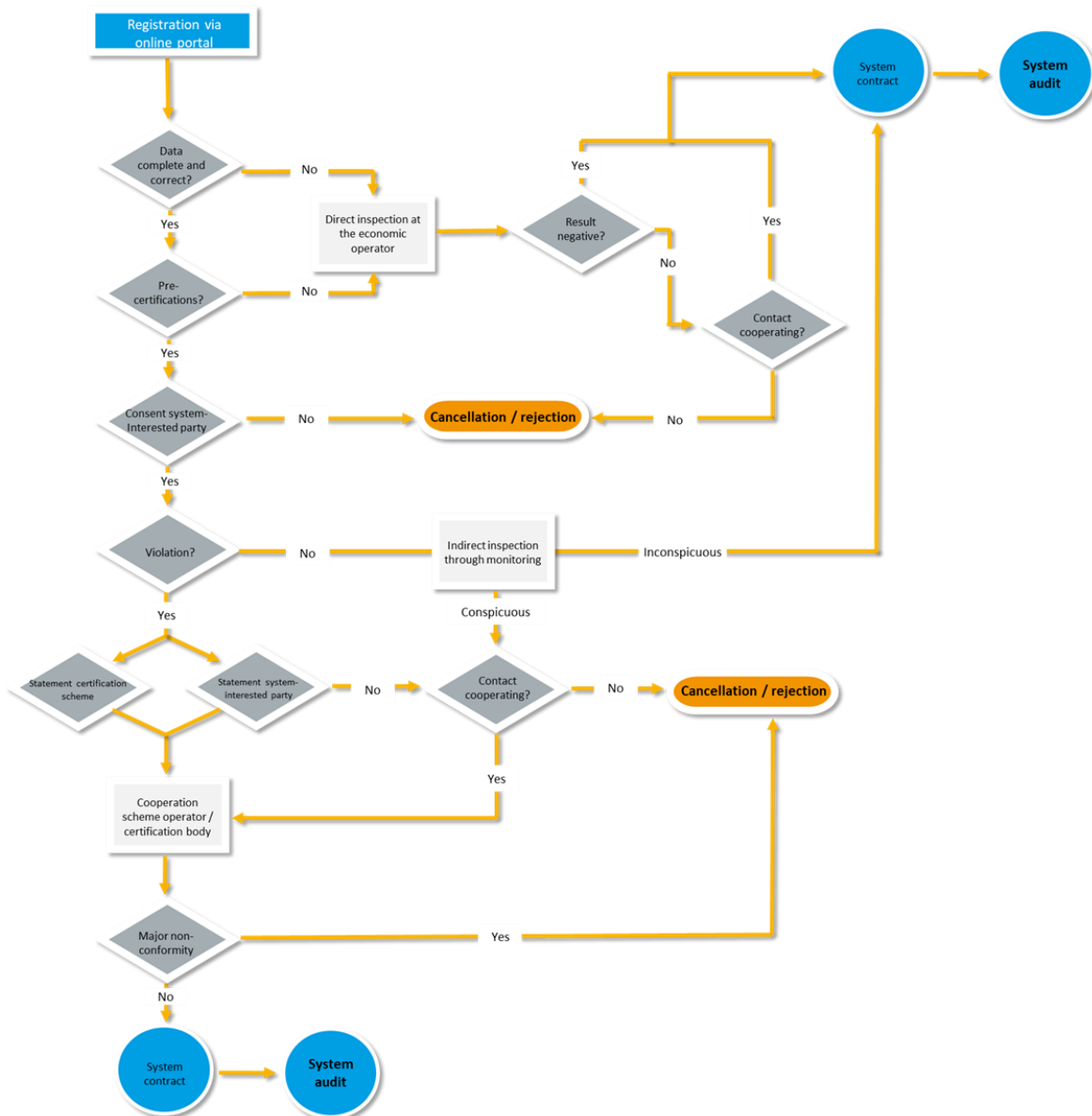


Figure 4: Preventive measures when a potential scheme participant registers with the scheme

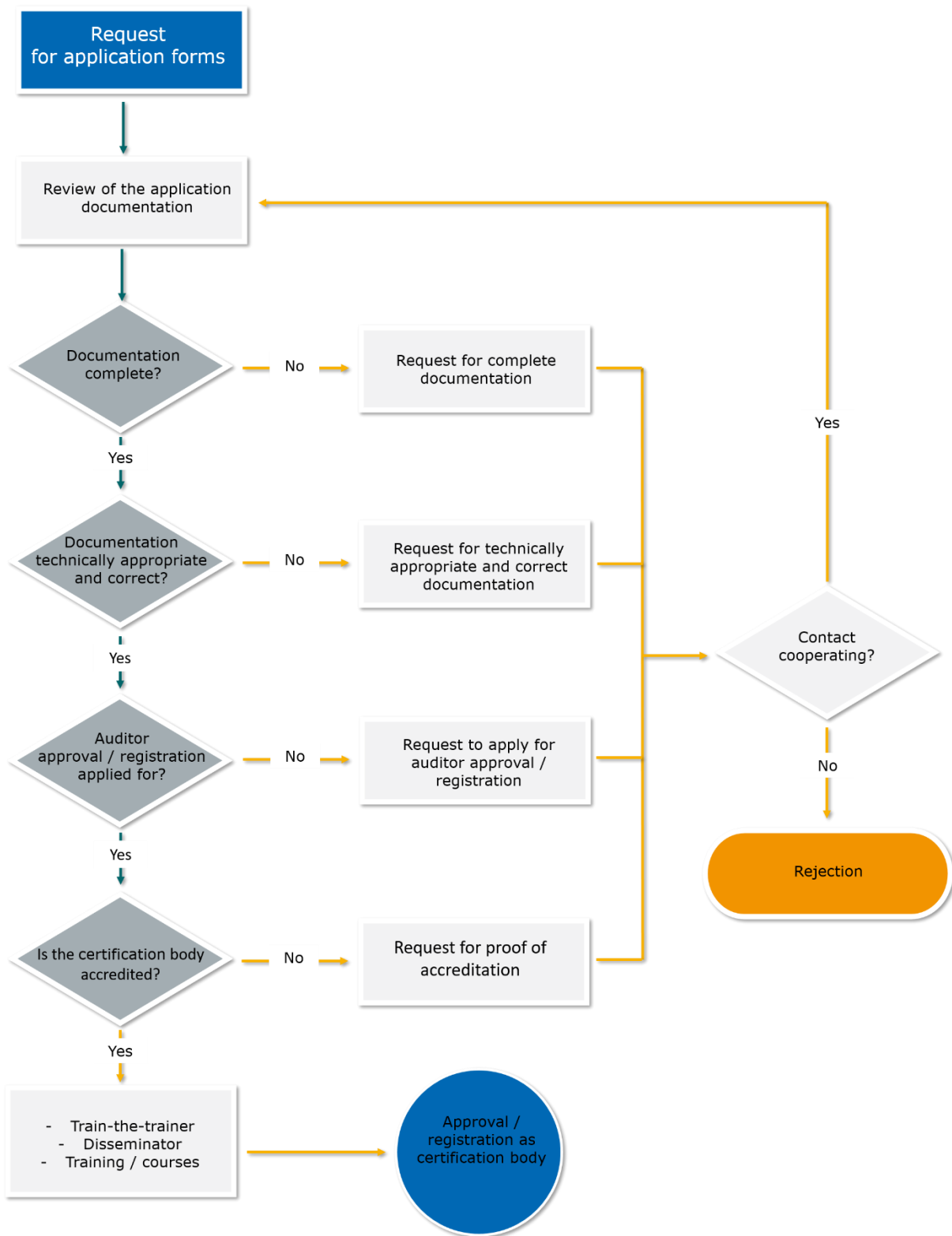


Figure 5: Preventive measures when a potential certification body becomes affiliated with the scheme

4 Complaint management system

A “complaint” is a statement by an interested party that expresses dissatisfaction and is linked to a claim against the activities of the scheme operator.

Complaints of any kind may be an [indication of suspected non-conformities or weaknesses](#) in scheme participants, certification bodies and the voluntary scheme itself, and may trigger additional inspections. The scheme operator has set up a complaint management system for this purpose.

It is the case that staff assigned by the REDcert management to handle the complaint must not have any conflict of interest related to the complaint and they must not be involved in handling the complaint if there is a conflict with the respective reporting person (e.g. if the complaint is directed against the activities of a REDcert staff member).

Grievances, complaints and appeals are deemed inadmissible if they meet any of the following criteria:

- The requirements related to form and content are not met. This includes complaints and appeals that are not sufficiently supported by objective and sufficient evidence necessary to obtain a clear idea and understanding of the situation at hand. [Complaints and appeals based on hearsay are not considered sufficient evidence.](#)
- The complaint or grievance seeks changes to the recognised REDcert-EU scheme.
- The complaint or appeal seeks to change sanctions imposed by REDcert for non-conformities or infringements of REDcert requirements.
- The reason for the complaint does not explicitly relate to REDcert or to activities carried out under REDcert.

Complaints (internal and external) can either be registered by e-mail (beschwerde@redcert.de), fax or letter by post. On the REDcert website, there is the option of submitting anonymous indications or comments. REDcert also installed a restricting access to complaints for authorised REDcert personnel. The IMS rules and the complaint management are part of the regular internal trainings for authorised REDcert personnel and all REDcert employees.

REDcert keeps a register of all complaints and provides a summary of those complaints to the European Commission in the annual activity report. Upon request by the European Commission or a Member State, all documents related to a complaint and its handling must be provided.

Complaints are directed against decisions/conclusions of the scheme operator or its certification bodies which, in the reporting person's view, are inconsistent with alleged scheme non-conformities 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 that meets the requirements in terms of form and content is accepted, analysed and tracked as shown in Figure 6. Possible reporting persons could be, for example:

- scheme participants or certification bodies
- competent offices of the European Commission
- competent national authorities and offices
- non-governmental organisations (NGOs)

The individual steps in the complaint process are carefully documented by the scheme operator.

The complaint process ensures the confidentiality and protection of persons who report infringements or log complaints. This also includes protecting the reporting person from retaliation. In accordance with Directive (EU) 2019/1937 the identity of the reporting person is not disclosed to anyone beyond the authorised staff members competent to receive or follow up on reports, without the explicit consent of that person. This shall also apply to any other information from which the identity of the reporting person may be directly or indirectly deduced (Chapter 5, Article 16 (1)). By way of derogation from paragraph 1, the identity of the reporting person and any other information referred to in paragraph 1 may be disclosed only where this is a necessary and proportionate obligation imposed by Union or national law in the context of investigations by national authorities or judicial proceedings, including with a view to safeguarding the rights of defence of the person concerned.

The person (reporting 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.

Where major scheme non-conformities 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).

Systematic documentation and complaint management contributes to the sound integrity and quality of the REDcert-EU scheme. REDcert keeps a register of all complaints and is required to provide a summary of these complaints to the Commission through the annual reporting process for reasons of transparency.

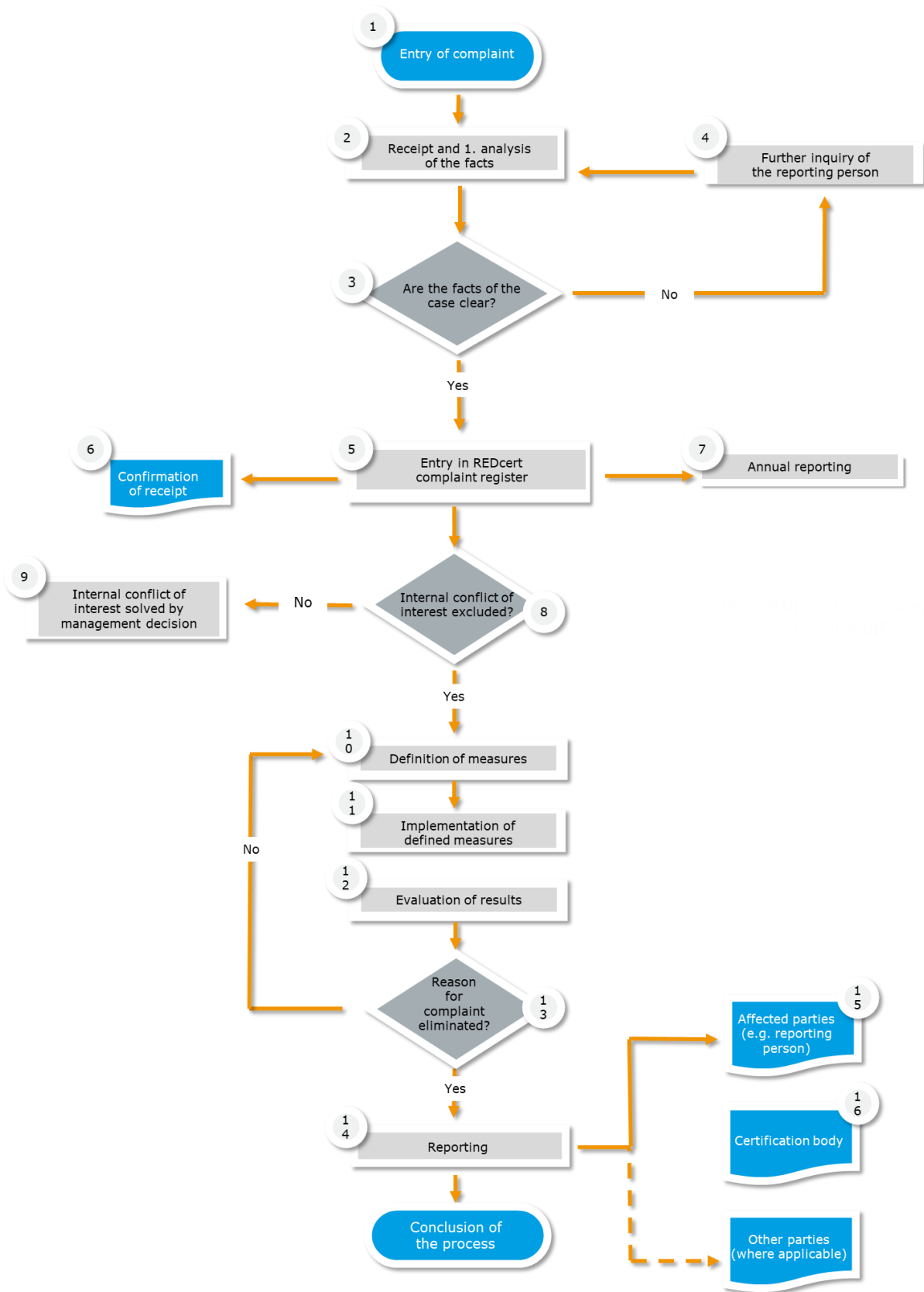


Figure 6: Diagram of the complaint process

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

- ① All **communication channels** are available to reporting person to submit the 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 report meets the definition of a complaint and verifiable information is available. If so, the scheme operator documents the **receipt of the complaint** and generates a progress report in which all other measures and incidents related to the complaint are entered chronologically and linked to the relevant information and accompanying documents.

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

- the reporting person (incl. contact data (if known and taking into account the Directive (EU) 2019/1937)
 - 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
- ③ The complaint is understandable and admissible according to the REDcert guidelines for complaints.
 - ④ If the **complaint is not sufficiently clear**, the reporting person who initiated the complaint is contacted and an attempt is made to obtain the missing information from the perspective of the reporting person.
 - ⑤ REDcert keeps a register of complaints received and measures taken, which ensures a transparent process to reduce conflicts of interest and the possibility of monitoring.
 - ⑥ If the **complaint is sufficiently substantive and convincing**, the reporting person will receive a letter/e-mail **within five working days** confirming receipt of the complaint and assuring him that the complaint will be further investigated and that information on its progress will be provided.

- ⑦ REDcert is required to provide a summary of the registered complaints to the Commission through the annual reporting process for reasons of transparency.
- ⑧ Possible conflicts of interest are investigated.
- ⑨ If internal conflicts of interest are identified, they are resolved by a decision of the management (e.g. if the complaint is directed against an employee of REDcert, the employee is exempted from handling the complaint by the management).
- ⑩ The scheme operator determines measures to permanently eliminate the reason for the complaint and its causes.
- ⑪ The reason for the complaint must be explained and eliminated by the person concerned (e.g. scheme participant or certification body).
- ⑫ The scheme operator reviews the **objections** of the person against whom the complaint was lodged or directly checks the implementation and effectiveness of the measures specified by the person or identified by the scheme operator.
- ⑬ If the assessment of the effectiveness of the measures (e.g. result of another audit) is not satisfactory, a new cycle of measures (see ⑩) is initiated in accordance with the PDCA cycle (Plan-Do-Check-Act) until the complaint is settled or it is followed up in the same way as the REDcert-EU sanctions procedures
- ⑭ Before the complaint procedure is concluded, a **summary report** is created.
- ⑮ The parties involved (reporting person as well as the party against whom the complaint is directed) are informed of the results of the investigations **within 5 working days after the complaint procedure was concluded**.
- ⑯ If the complaint concerns a scheme participant, the responsible certification body is informed of the results of the investigations to be able to analyse facts relevant to the complaint (e.g. implemented measures) in a regular or commissioned special audit at the request of REDcert.

5 Sanction management system

A certification scheme for sustainably produced biomass is required to have **measures** in place that are initiated in the event that a certification body determines that an economic operator participating in the certification scheme does not meet or no longer meets the requirements set forth in the relevant directives or regulations or additional requirements of the certification scheme.

Non-conformities in how the REDcert certification scheme is applied by a scheme participant can be identified in different ways, in particular through

- an audit by the neutral certification body responsible or
- a special audit by an auditor commissioned by the scheme operator.

The ultimate aim of the REDcert sanction management system is to effectively punish proven scheme non-conformities (with the exception of initial certifications). The escalation of sanction measures includes warnings, reprimands (possibly in conjunction with a contractual penalty) and the extraordinary and immediate termination of the REDcert scheme contract. This is described in more detail in section 6.

In cases of non-conformities (< 75% and/or KO evaluation(s)), which are found during the above audits (except for initial certifications) and do not guarantee the integrity of the scheme, an independent advisory board decides on possible sanctions. The members of this **Sanction Committee** are appointed by the general meeting of the scheme operator and can also be dismissed by this meeting. How the Sanction Committee works, i.e. its responsibilities and functions, is laid down in rules of procedure and implemented through a master agreement with the appointed members.

Members need experience in the sectors certified by REDcert but may not be subject to any potential conflict of interest resulting from past or present professional activities. The chair of the Sanction Committee must be a lawyer with the necessary qualifications to hold a judicial office. This combination ensures that non-conformities of the REDcert-EU scheme are handled in compliance with technical and legal requirements without the risk of conflicts of interest.

6 Crisis management system

For the scheme operator, crises represent incidents that

- (can) damage the image/reputation of the company
- (can) affect the public trust in the voluntary scheme or the scheme operator
- (can) cause economic damage.

To be able to deal confidently with crisis situations, the scheme operator has established a crisis management system. Crisis management is closely linked to the risk analysis outlined above, but the scheme operator sees the need to set up a separate set of instruments for crisis situations.

The crisis management system is an internal REDcert management tool whose documentation is subject to strict confidentiality. They are therefore not part of the REDcert scheme principles.

7 Measures

7.1 Measures to ensure scheme integrity

Economic operators and certification bodies failing or unwilling to comply with the requirements set out in Articles 30(8) to 30(10) of Revised Directive (EU) 2018/2001 and the paragraphs 1 to 6 of Article 17 of the Implementing Regulation (EU) 2022/996 concerning the supervision task of the Member States and the Commission must be excluded from participating in and conducting audits under REDcert.

7.1.1 Transparency in scheme representation

REDcert informs the interested public (potential scheme users, media, associations and special interest groups) extensively about the content and requirements of the certification scheme. All approved scheme documents required for implementation and monitoring the scheme are available at www.redcert.org. In addition, REDcert provides tools and informational materials to scheme participants and the certification bodies who work for them. Interested parties and authorities thus have the opportunity to view these documents at any time and keep up to date on the current status of the scheme by receiving a free newsletter.

7.1.2 Transparency in scheme membership

REDcert concludes written contracts with the scheme participants (economic operators) and with the certification bodies active in the REDcert-EU scheme. These contracts clearly stipulate the rights and obligations of the respective parties.

These contracts ensure that the requirements of the certification scheme:

- a) are binding in their application
- b) are verifiable and transparent
- c) can, when necessary, be enforced with legal means

The contracts are carefully structured standard documents. Individual agreements relating to the scheme requirements are not made.

7.1.3 Transparency in scheme management

The scheme operator uses a database to manage the certification scheme that documents all

- scheme participants including all of the dependent operational sites of each member registered
- audits conducted (certification documentation) regardless of result
- all sanction measures

The scheme management is always able to give interested parties information about the status of the REDcert participants, audits and sanctions.

7.1.4 Transparency in certification

To make it possible for all economic operators to have a transparent and tamper-proof **overview of all certificates of conformity issued in the REDcert scheme** – valid, expired and suspended – the REDcert database publicly makes these certificates available online together with detailed information on the validity and the scope of application (www.redcert.org).

7.1.5 Assuring scheme integrity and preventing misuse and fraud

REDcert has effective processes to reduce the potential risks of scheme non-conformities, misuse and fraud and effectively combat these kinds of tendencies.

Registration process for new, potential scheme participants

Every potential scheme participant must disclose upon registration whether and to what extent he was already or is still a participant of another certification scheme. In addition, the reason for the scheme change must be indicated and, in the event of a scheme expulsion due to non-conformities, the scheme operator has the right to obtain detailed information about the non-conformities in question from the previous and current certification scheme. These prerequisites are intended to prevent "scheme hopping".

Systematic monitoring of GHG balances and the GHG savings declared in the proofs of sustainability

For the systematic monitoring of GHG balances and the GHG savings declared in the proofs of sustainability, the scheme operator envisages close cooperation with the certification bodies and national authorities. Furthermore, the information provided by the certification body shall include all relevant data to examine whether the sustainability and greenhouse gas emissions saving criteria in relation to a particular consignment are met, including audit reports and actual greenhouse gas calculations.

The protected REDcert brand

Gesellschaft zur Zertifizierung nachhaltiger Biomasse mbH has a service mark of the same name registered with the European Trademark Office. It may be used exclusively by the scheme participants and recognised certification bodies. This trademark right gives rise to extensive options to take action against misuse or fraudulent use of the REDcert brand **without any other proof of non-compliant scheme behaviour being necessary**.

7.2 Measures to ensure scheme compliance

The implementation of the scheme requirements formulated in the respective scheme principles (see section 7) by the scheme partner ensures that behaviour is scheme compliant.

7.3 Measures to resolve complaints

To **eliminate the cause of a complaint**, REDcert first contacts the party (e.g. scheme participant or certification body) named in the complaint and confronts the party with the allegation, as long as it is not the scheme operator itself. If the reason for the complaint is a direct or potential threat to the REDcert-EU scheme, the scheme operator is authorised to carry out special audits (see the scheme principles for neutral inspections for more information).

Prior to this, the party against whom a complaint has been filed is invited to review the reason for the complaint and submit **a written reply within 10 working days**. If the party does not object to the complaint, the party is directly requested to eliminate the reason for the complaint and its causes.

The reply submitted by the person against whom the complaint was logged and the elimination of the cause of the complaint is checked by the scheme operator. The implementation and effectiveness of the elimination measures specified by the party concerned or ordered by the scheme operator may also be verified, for example, by means of a **special audit**.

If a complaint is filed against the scheme operator itself, an internal audit of the measures taken as a result is carried out.

If implementation and effectiveness of measures are found to be unsatisfactory, additional measures are expected or ordered by the scheme operator until the cause of the complaint has been permanently eliminated. In the event of **major non-conformities** by a scheme participant, a sanction process is initiated.

Once the measures have been successfully implemented, a **progress report** is drawn up and sent to the reporting person and – where appropriate – to other parties.

In some cases, such as more complex incidents, the scheme operator may need to prepare an **interim report**. Interim reports must be created if there are more than 4 weeks between confirmation of receipt and resolution the incident.

7.4 Measures to sanction and remedy major non-conformities

REDcert communicates **sanctions** solely to the contractually bound scheme participant.

The basis for sanctions is all available evidence, in particular the findings about the non-conformity in the audit report. The scheme participant is given the opportunity upfront to **respond** in a reasonable amount of time.

The scheme participant is responsible vis-à-vis the scheme operator for immediately remedying the **problem found**. However, the scheme participant is free to pursue recourse against the operating site responsible for the imposed sanctions.

As an immediate measure, a **follow-up audit** is carried out shortly thereafter by the certification body responsible.

Internal scheme sanctions in no way replace the regulatory function of the competent authority. It is up to the discretion of this authority to lay down its own regulatory measures for any non-conformities found.

The **REDcert sanction system** is structured into several levels:

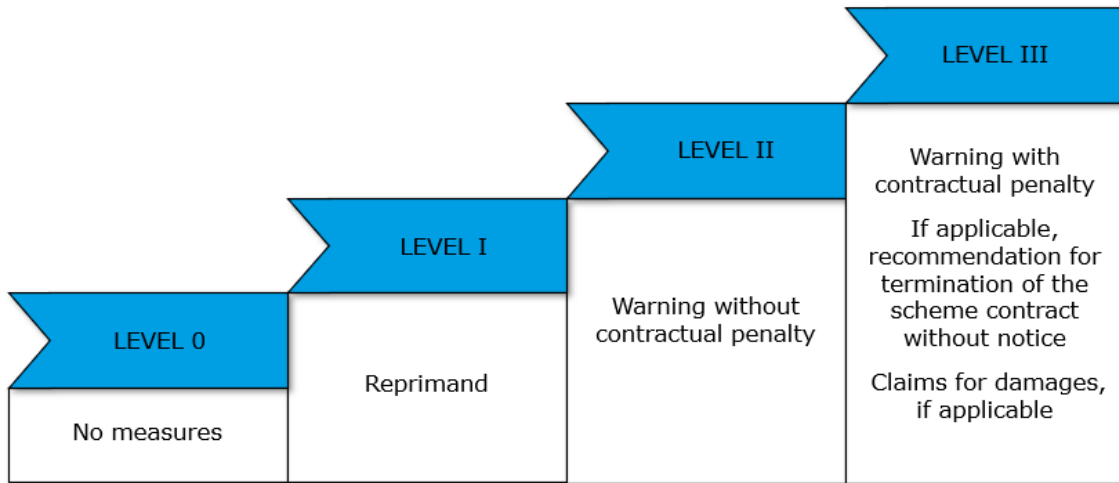


Figure 7: The levels of the REDcert sanction system

Sanction level 0

The Sanction Committee determines that no other measures against the scheme participant are necessary.

Sanction level I

The Sanction Committee determines that a **reprimand** must be issued to the scheme participant to implement the requirements of the sustainability regulations and the REDcert-EU certification scheme more carefully in the company.

Sanction level II

The Sanction Committee determines that a **warning** must be communicated to the scheme participant. If the problem recurs, the result is generally Sanction level III.

Sanction level III

The Sanction Committee determines that a **warning with contractual penalty** must be communicated to the scheme participant.

At Sanction Level III, a **contractual fine of up to €30,000** may be imposed depending on the severity of the non-conformities and/or the amount of damage caused by the non-

conformities and/or taking into account the advantages achieved through the illegal activities and taking into consideration the size of the operation.

It is up to the independent Sanction Committee's discretion to set the fine individually in each case.

The scheme participant has to bear the costs of pursuing legal remedies to enforce the contractual penalty.

REDcert in turn is required:

- to inform the scheme participant of the Sanction Committee's decision
- to enforce the sanctions defined by the Sanction Committee with the scheme participant
- to freely decide whether to increase the inspection frequency, also for the other operating sites owned by the scheme participant

The scheme operator is also required for **Sanction Level III**

- to review, at its own discretion, whether to prematurely terminate the contract
- to declare termination if necessary
- to undertake other steps to satisfy civil claims (damages)

If a **scheme contract is terminated prematurely**, the scheme participant in question may only join the REDcert certification scheme after 6 months at the earliest and subject to another review of the prerequisites.

If, as a result of a sanction, a scheme contract is **terminated within the defined notice period** – regardless of which side terminates – the company may rejoin the scheme without a waiting period only once the prerequisites have been checked.

The scheme operator has the right to inform all parties (e.g. other scheme operators, certification bodies, the economic operators involved) for whom the non-conformity is relevant about this non-conformity as an **additional and possibly even necessary sanction measure**.

Critical for the parties above are considered all non-conformities that

- result in sustainability or partial proofs of sustainability becoming invalid either in part or in full or
- relate to the declaration of specific parties identified as "sustainable" for "biomass" on the market

If these types of legal non-conformities are found or identified by the scheme participant, he is required to immediately inform the party affected of the non-conformity and its possible impact on the downstream economic operators. The scheme participant has to inform REDcert **within a period of 7 business days** in an appropriate manner, i.e. by providing a copy of the written correspondence.

If the scheme participant fails to report to REDcert which information he has provided to the parties affected by the deadline, REDcert is authorised to perform an immediate special audit of the site in question and to communicate the suspected non-conformity to all other parties it feels are critically affected.

The decision of the Sanction Committee may be **appealed**. The appeal must be sent in writing to REDcert (business address) within 30 days of receipt of the written decision. Reasons for the appeal must be provided.

An appeal, which is submitted with a written statement of reasons, results in suspension. The decision of the Sanction Committee only takes effect if the Committee confirms its decision in the appeal procedure. This does not apply if, in exceptional cases, the Sanction Committee has decided to enforce a sanction immediately. In this case, the prescribed sanctions must first be complied with, regardless of any appeal. After an appeal has been made, the Sanction Committee reviews its decision and informs the scheme operator of the result of this review.

The ultimate aim of the REDcert sanction system is to effectively punish proven scheme non-conformities. Economic operators whose certificates are suspended are not allowed to make sustainability claims until the suspension has been lifted. Suspended operators may not join another voluntary scheme while the certificate is suspended. Where a certificate is withdrawn following an audit which confirmed a critical non-conformity and the scheme contract is terminated without notice during the sanction procedure, that economic operator can be excluded from scheme participation for at least two years. When accepting new scheme participants, REDcert takes into account any blocking periods of other voluntary systems. Where an economic operator that was previously found to be in critical or major non-conformity applies for re-certification, the auditor must, through his certification body, bring that fact to the attention of all voluntary schemes in which the economic operator is currently participating, or to which it has applied for recertification.

7.5 Measures to ensure scheme integrity at certification bodies

The certification bodies approved by REDcert and their auditors also play an important role in ensuring scheme integrity. Where REDcert has reasonable doubts from a member state, the European Commission or another voluntary scheme about the ability of a specific certification body to carry out its audit work, it will immediately initiate an investigation of the facts. Upon completion of its investigation, the voluntary scheme informs the member states and the European Commission of the outcome of the investigation and of any corrective actions taken the certification bodies are required to submit all reports and necessary documents for inspection to REDcert upon request. In addition to the scheme requirements defined in the scheme principles for neutral inspection, REDcert also has effective procedures for these inspection bodies to reduce the risk potential for scheme violations, abuse and fraud and to counteract these tendencies:

Systematic monitoring of all certification processes

The REDcert database is used to view and analyse all certifications that have been carried out. Statistics are created for the following criteria for every certification body on an annual basis and when requested:

- a) compliance with the deadlines prescribed by the certification scheme for reporting and issuing certificates
- b) duration of "on-site" inspections taking into account the respective scope of application

In the event of deviating or conspicuous values, the certification body in question is contacted directly and asked for an explanation or to undertake corrective measures. If the non-conformities persist, the scheme operator can exclude the respective certification body from the REDcert certification scheme. In addition, the scheme operator regularly spot checks the audit reports stored in the database to ensure that:

- a) the reports are complete
- b) the reports are understandable (informative and easy to read)
- c) the reports are coherent (consistency between evaluation and description of facts)
- d) the results are plausibly presented

Criteria for random selection of certification bodies and scheme participants for internal monitoring of audit reports	
<ul style="list-style-type: none"> ➤ Random (all scheme participants and the certification body are subject to the REDcert integrity programme/monitoring) ➤ Indications of non-compliance or fraud ➤ Minimum sample size: \sqrt{n} of audit reports stored per quarter 	
Risk-based criteria for the selection of scheme participants:	Risk-based criteria for the selection of certification bodies:
<ul style="list-style-type: none"> ➤ Place/region ➤ Scope of application ➤ Type of biomass 	<ul style="list-style-type: none"> ➤ Number of audits conducted per certification body ➤ Number of audits conducted per auditor ➤ Significant deviations from the average audit duration (25%) ➤ Place/region of activity

Table 1: Criteria for random selection of certification bodies and scheme participants for internal monitoring of audit reports.

If reports do not meet REDcert requirements, REDcert reserves the right to take further action to ensure scheme integrity. These may be depending on the severity of the deviation: These may be depending on the severity of the non-conformity:

- correction of the audit report
- follow-up training of the certification body
- requirement for auditor follow-up training
- conducting special audits
- requirement to repeat the audit
- requirement to withdraw certification
- etc.

Unacceptable reports are returned by REDcert to the certification body for clarification and, if necessary, corrected by the certification body by a specified date.

Monitoring activities include both audits and the inspection of a sample of audit reports prepared by each certification body.

The goal of this monitoring measure is to identify weaknesses, to prevent incorrect or insufficiently substantiated information and harmonise the inspection quality of the certification bodies active in the REDcert scheme.

Systematic monitoring of the certification bodies

All of the certification bodies active in the REDcert-EU scheme are at least officially recognised or have an equivalent accreditation. In addition to the quality assurance measures embedded in this recognition and accreditation process, the scheme operator has established an independent monitoring process for certification bodies. This involves, among others:

- a) subject-specific registration and approval as well as deployment monitoring of inspectors
- b) the obligation to train the deployed auditors regularly by the certification body
- c) the qualification of the relevant people responsible for implementation of the "train-the-trainer" principle in each certification body by the scheme operator
- d) optional monitoring of an inspection and/or assessment of the certification body by REDcert's own auditors or auditors commissioned by REDcert

The knowledge and reporting requirements of certification bodies

Certification bodies must inform the scheme operator immediately if an economic operator who is REDcert-certified and wants to be recertified is found to be in major non-conformities of this requirement or any other aspect of the mandatory sustainability criteria. This enables REDcert to initiate any necessary steps required by the integrity management system.

8 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".

9 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 www.redcert.org .
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: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02018L2001-20240716		

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. References to legal regulations always relate to the current version.

10 Revision information for Version EU 03

Section	Change
General	Reworded: Revised Directive (EU) 2018/2001 instead of Directive (EU) 2018/2001 RED III instead of RED II
General	Wording adapted to the new definition of renewable fuels and in line with the extension of the scope of the REDcert-EU system to include RFNBO and RCF.

Publication information

REDcert GmbH

Schwertberger Straße 16

53177 Bonn

Germany

+49 (0) 228 3506 200

www.redcert.org