



REDcert

Complaint management system

Version 01

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1 Introduction

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.

In addition, complaints of all kinds can be an indication that scheme non-conformities exist or that a scheme participant, the REDcert scheme operator or a certification body active in the scheme has possible weaknesses, therefore triggering additional inspection measures. To this end REDcert has set up a complaint management system.

2 Complaint process

Every complaint directed at REDcert is accepted, analysed and tracked according to the diagram below. Potential complaint initiators are

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

The complaint process is confidential on principle, i.e. neither the person who initiates the complaint nor the parties identified in the complaint are disclosed to third parties while the process is pending as long as this is not required by other provisions under the scope of sustainability certification and biofuel regulations, e.g. vis-à-vis the authorities responsible. The individual steps in the complaint process are carefully documented by REDcert.

The person who initiates the complaint - as long as it did not submit the complaint anonymously - as well as any other parties affected (e.g. competent authorities or the EU Commission) are informed of the results of the investigations.

If the complaint process gives rise to proof of serious scheme non-conformities, this is further pursued the same way as in systematic inspections under the sanction system.

Complaint management falls under the area of “Scheme Management, in this case: “Integrity Management”. Depending on the reason for and type of complaint, other areas of REDcert are involved to analyse the incident.

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

- ① All communication channels are available to complaint initiator to submit his complaint to REDcert. In particular, however, we refer to the option of anonymous contact via a protected area on the REDcert web site set up as part of REDcert’s crisis management.
- ② REDcert documents receipt of the complaint and creates a corresponding progress sheet in which all other measures or events related to the complaint are entered chronologically and are linked with the relevant information and supporting documents.
In an initial analysis of the complaint, the following is systematically determined and documented:
 - the complaint initiator
 - the reason for the complaint (information about the companies affected or involved, biomass/biofuel types, quantities, time periods and other details)
 - possible causes of the complaint (as long as this can be ascertained at this point in time)
 - potential magnitude of the complaint with respect to the integrity of the REDcert scheme
- ③ In the analysis, it is checked and documented whether the submitted complaint is adequately substantial with respect to the criteria listed above to introduce further measures.
- ④ If the complaint is not sufficiently clear, the person who initiated the complaint 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 it is not possible to clarify it further due to a lack of contact, the complaint process generally ends at this point.
- ⑤ If the complaint is adequately substantial and convincing, the complaint initiator receives written confirmation that the complaint was received within five working days and is assured of further processing and information.
- ⑥ REDcert defines measures to permanently eliminate the reason for the complaint and its causes. This includes contacting and confronting the person against whom the complaint is submitted with the complaint as long as this is not REDcert itself.

If the reason for the complaint represents a direct risk or a potential risk for the REDcert scheme, REDcert is authorized to carry out special inspections in accordance with section 6.3.1 of the scheme principles for “Neutral inspections”.

- ⑦ The person against whom the complaint is submitted is asked to review the reason for the complaint and submit a written response within 10 working days. If he does not object to the complaint, he is asked directly to eliminate the reason for the complaint and its causes.
- ⑧ REDcert reviews the objections submitted by the person against whom the complaint is submitted or directly evaluates the implementation and effectiveness of the measures specified by the person against whom the complaint in an appropriate manner. This can, for example, take place as part of a special inspection. In the event that a complaint is submitted against REDcert itself, an internal audit of the implemented measures is performed.
- ⑨ If the result of the audit is not satisfactory, a new cycle of measures (→ (6)) in accordance with the PDCA cycle (**Plan-Do-Check-Act**) is initiated until the reason for the complaint is permanently eliminated.
A sanction process is triggered in the event of major non-conformities of a relevant scheme participant.
- ⑩ After the measures are completed, a summary report is created in the progress sheet that is sent to the complaint initiator and – if appropriate – other parties.
In an individual case, e.g. for more complex incidents, it may be necessary for REDcert to create an interim report. The standard for necessary interim reports is a period of more than 4 weeks between confirmation of receipt and completion of the incident (→ (9)).

The systematic documentation and processing of complaints against REDcert and/or a company or a certification body and its staff operating under the scope of the REDcert scheme safeguards the integrity and quality of the REDcert scheme.

If a complaint represents an increased crisis potential for REDcert, REDcert’s **crisis management system** is activated at the same time as the complaint process.

Crisis management is an internal REDcert management tool whose documentation is subject to strict confidentiality. It is therefore not part of the REDcert scheme principles.

3 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, biofuels and bioliquids	
3	Scheme principles for GHG calculation	
4	Scheme principles for mass balancing	
5	Scheme principles for neutral inspections	
6	Sanction system	
7	Complaint management system	
8	Phase-specific checklists	

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 and bioliquids including other relevant references that represent the basis of the REDcert-EU documentation are published separately on REDcert's website at www.redcert.org. When legal regulations are referenced, the most current version is always assumed.