

## Assessment

### Scottish Quality Crops Voluntary Scheme Version as submitted on 27 March 2012

#### Summary recommendation to European Commission

An assessment has been made on compliance of the Scottish Quality Farm Assured Combinable Crops Voluntary Scheme (hereafter "SQC"), as submitted to the European Commission for recognition, with the sustainability criteria of Directive 2009/28/EC.

The assessment results indicate that the SQC scheme meets the mandatory sustainability requirements of Directive 2009/28/EC on land-use, chain of custody and audit quality.

Scheme scope:

- Feedstock: Winter wheat, maize, oil seed rape
- Geographic scope: North of Great Britain (covering an area from Durham, Northumberland and Cumbria in England, the whole of the Scottish mainland, the Western Isles, Orkney and Shetland)
- Fuel chain scope: Production of feedstock up to the first point of delivery

#### Background

SQC was formed on 29 April 1994 to launch an on-farm Assurance Scheme for initially cereals, but expanded in 2007 to include all combinable crops. SQC is a Company Limited by Guarantee, with the members/guarantors comprising National Farmers Union of Scotland, Agricultural Industries Confederation, Scottish Flour Millers Association, Scottish Agricultural Organisation Society Limited, Maltsters Association of Great Britain, The Scotch Whisky Association, The Malt Distillers Association of Scotland and The Scottish Agricultural College. SQC operates independently and on a not for profit basis.

Participation in the Scheme is voluntary and open to all producers of combinable crops in the North of Great Britain. There are currently approximately 3,500 growers participating annually in the Scheme, representing around 90% of the total production of combinable crops grown in this area. The remaining combinable crop production tends to be undertaken by smaller scale producers, predominantly for on-farm feeding to cattle, pigs and sheep. Farm Assurance is now a pre-requisite for the majority of users of combinable crops grown in Scotland and the North of England, for example, maltsters, distillers and feed compounders.

SQC is seeking formal assessment and recognition by the European Commission for the SQC Voluntary Scheme, as a 'voluntary scheme' which economic operators can use to demonstrate to Member States that the sustainability criteria relating to land with high biodiversity value (Article 17(3)), and land with high carbon stock (Article 17(4-5)) are complied with.

**Please note this assessment focuses on coverage of the mandatory criteria, Articles 17(3)-(5). Coverage of the criteria that are 'non-mandatory' for economic operators, Article 18(4), is not part of this assessment at this time.**

### **Assessment results**

The summary results of the assessment are presented in the table below. The detailed assessment results are available in Annex 1. In addition, one specific point is presented below, which SQC is recommended to take into account.

### **Supplementary Information document:**

The 'Supplementary Information' document provides a very useful overview of the SQC voluntary scheme. As such, we would recommend that it is included as an appendix in the standard and also made available on SQC's website.

### **Communication on the standard once approved by the Commission**

Since this updated SQC standard would normally only be published in autumn 2012, it is advised that upon recognition by the Commission it is communicated to SQC participants through appropriate channels (e.g. SQC's newsletter, website, etc.)

Table 1: Assessment results - summary

RED Article	SQC	Comments
	Version as submitted 27 March 2012	
Sustainability criteria		
17(2): Greenhouse gas emissions savings	n/a	SQC is not seeking EC recognition for Article 17(2). However the scheme can still provide useful information to economic operators further down the supply chain on:  1. NUTS2 information and use of cultivation default values  2. Proof that no land use change has occurred.
17(3): Conservation of biodiversity	Y	
17(4): Conservation of carbon stocks	Y	3.2 Recommendation to clarify that continuously forested areas do not include land that is predominantly under agricultural use (including oil palm plantations), as per

		EC Communication 2010/C 160/02, section 4.2.2.
17(5): Conservation of peatlands	Y	
<b>Chain of Custody</b>		
18(1): Use of a mass balance system	Y	
<b>Recognition of other voluntary schemes</b>	n/a	Not applicable to the SQC scheme
<b>Audit Quality</b>		
18(3): Adequate standard of independent auditing	Y	<p>All points listed are recommendations:</p> <p>6.1 The list of documents checked by assessors mentioned in Annex A should be updated with all documents mentioned in the scheme. For example the documents asked to the farmer in the 4.9.3 (dispatch) is not asked in Annex A.</p> <p>6.1 The SFQC Farm Record Book Sep 2011.pdf provided as evidence should be updated to reflect the list amended in the supplementary information document (Mass balance)</p> <p>6.7 The scheme could indicate more explicitly that the timeline for addressing non-conformances is one month by default, unless otherwise specified by the assessor.</p>

## Annex 1: Detailed assessment results

### Sustainability criteria

The sustainability criteria detailed below are the mandatory sustainability criteria of the RED: Article 17(2) – 17(5)). It is intended that it will be possible for a scheme to be recognised for compliance with individual Articles under the RED.

Article 17(2): Greenhouse gas emissions savings	The use and production of biofuels and bioliquids should lead to reductions in greenhouse gas emissions compared to fossil fuels	
Requirement	Guidance	Assessment
1.1 The greenhouse gas emission saving from the use of biofuels and bioliquids shall be at least 35%.	<ul style="list-style-type: none"> <li>In the case of biofuels and bioliquids produced by any installation<sup>1</sup> that was in operation on 23 January 2008, the 35% greenhouse gas saving threshold needs to apply from 1 April 2013, and may also apply before that date.</li> </ul>	n/a SQC is not seeking EC-recognition for Article 17(2).
1.2 The greenhouse gas emission saving from the use of biofuels and bioliquids shall be calculated in accordance with RED Article 19(1)-19(3), Annex V and Commission Decision 2010/335/EU of 10 June 2010.	<ul style="list-style-type: none"> <li>Greenhouse gas emissions from any land-use change that has occurred since 1 January 2008 shall be taken into account in the greenhouse gas calculation, according to the methodology in the RED Annex V.</li> </ul>	<p>n/a SQC is not seeking EC-recognition for Article 17(2). However the scheme can still provide useful information to economic operators further down the supply chain.</p> <ul style="list-style-type: none"> <li>1. NUTS2 information and use of cultivation default values</li> <li>SQC allows regional/location identification of feedstock</li> </ul>

<sup>1</sup> The term "installation" includes any processing installation used in the production process, as long as it has not been intentionally added to the production chain only to qualify for the exemption.

			<p>cultivation as the post code of the farm is stated on the grain passport which passes down the supply chain. This can be used further down the supply chain to assess whether a GHG default can be used.</p> <ul style="list-style-type: none"> <li>• Supplementary information RED(8.1):</li> <li>• The membership status of every grower can be confirmed at the point of first delivery by reference to a list updated weekly and sent to participating merchants and processors, or by contacting the SFQC office, or by prior arrangement and by secure password on the SQC web site. The addresses of all growers are included in the weekly list and by cross referencing the county in which the farm is located with the NUTS 3 list attached to the weekly list the NUTS 2 region can be found. The Regional emissions from biofuels cultivation of each NUTS 2 is available to all on the SQC web site. Purchasers use these SQC Passports as evidence that produce is of assured status, and in the case of crops destined as raw material for liquid biofuel, that the crop meets the requirements of [...] the RED (p4).</li> <li>• 2. Proof that no land use change has occurred</li> <li>• Farmers are only permitted to sign the RED-compliant declaration on the grain passport if they comply with section 3.2.1 of the SQC standards which effectively prohibits land use change (see further below).</li> <li>• Therefore if any RED-compliant land use change has occurred (e.g. permanent non-highly biodiverse</li> </ul>
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			<p>grassland to cropland), this will be communicated to downstream operators as being <b>non</b>-RED-compliant. As such there is no risk that a land use change can occur without it being communicated to downstream operators.</p> <ul style="list-style-type: none"> <li>• The scheme does not explicitly state that no land use change is occurring. Nonetheless, it is considered that this is de facto covered by the scheme, with the following rationale:</li> <li>• Under the RED and the accompanying Communications and Decision on Carbon Stocks, a land use change is understood to refer to changes in terms of land cover between the six land categories used by the IPCC plus a seventh category of perennial crops. Assessing each category of land in the context of SQC: <ul style="list-style-type: none"> <li>○ Forest land: No conversion of primary forest, or forest areas &gt;1ha with canopy cover 10-30% or 30%+ is permitted under the SQC scheme.</li> <li>○ Grasslands: No conversion of 'permanent' grasslands is permitted, defined as grassland that which has been established for more than 5 years. 'Temporary' grassland (established for less than 5 years) is considered to be land that is used on a rotational basis and therefore classified as cropland, and no emissions from land use change would</li> </ul> </li> </ul>
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			<p>need to be taken into account.</p> <ul style="list-style-type: none"> <li>○ Wetlands: No conversion is permitted.</li> <li>○ Settlements and Other land: Not considered relevant.</li> <li>○ Cropland: No land use change has occurred.</li> <li>○ Perennial cropland: Conversion of Short Rotation Coppice (SRC) to arable land for wheat, maize or oilseed rape production is considered to be low risk as the SRC area in Scotland and northern England is small and commonly on areas unsuitable for wheat, maize or oilseed rape production. Further, the guidance notes for the assessor of the SQC scheme make sure that such conversion would be picked up by an auditor under the SQC scheme.</li> </ul> <p>It is feasible that miscanthus could be converted to annual crops and the resulting GHG impact of the land use change would not be recorded under the scheme. However, this is considered to be low risk as miscanthus area is negligible in Scotland and northern England.</p>
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<b>Article 17(3): Conservation of biodiversity</b>	<b>Biofuels and bioliquids shall not be made from raw material obtained from land with high biodiversity value</b>	
Requirement	Guidance	Assessment
2.1 Conservation of primary forest and other wooded land	<ul style="list-style-type: none"> <li>Biofuels and bioliquids shall not be made from raw material obtained from land that was primary forest or other wooded land in or after January 2008, whether or not the land continues to have that status</li> <li>Primary forest and other wooded land is defined as forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed.</li> </ul>	<div>Y</div> <ul style="list-style-type: none"> <li>SQC Standards 2012 Revision 8.1:</li> <li>Part II, 3.1 For the production of crops compliant with the Renewable Energy Directive growers must comply with the Articles 17(3) to 17 (6), the land based sustainability criteria, of Directive 2009/28/EC of the European Parliament and of the Council, the Renewable Energy Directive, (Renewable Energy directive 2009/28/EC).</li> <li>Growers must provide information on the area in their current business which was in an arable rotation (including temporary grass) at the 1st January 2008.</li> <li>If growers are unable to provide information on parts of the land currently cropped, these crops will not be compliant with the Renewable Energy Directive and the grower will be only [be] partially compliant.</li> <li>Crops (raw materials) must not be obtained from land with a high biodiversity value and / or high carbon stock on or after 1st January 2008. This land is defined as:</li> <li><b>High biodiversity value:</b> High biodiversity land is defined as:</li> <li>Primary forest and other wooded land, namely forest and other wooded land of native species, where there</li> </ul>

			<p>is no clearly visible indication of human activity and the ecological processes are not significantly disturbed.</p> <ul style="list-style-type: none"> <li>• Part II, 3.2.1 Growers must provide information on the area which is in an arable rotation (including temporary grass) for the current year. It must be established that this area is not from high biodiversity land, high carbon stock or peat land drained since January 2008. Evidence must be provided to the assessor showing the land status at Jan 2008; if this is not available, the land will be assumed as non-compliant to the RED.</li> <li>• Any area from high biodiversity land, high carbon stock land or peat land drained since January 2008 will not be compliant with the land based sustainability criteria, Articles 17(3) to 17(5) of the Renewable Energy Directive 2009/28/EC.</li> </ul>
2.2 Conservation of protected areas	<ul style="list-style-type: none"> <li>• Biofuels and bioliquids shall not be made from raw material obtained from land that was a protected area in or after January 2008, whether or not the land continues to have that status.</li> <li>• This includes areas designated: <ul style="list-style-type: none"> <li>i) by law or by the relevant competent authority for nature protection purposes; or</li> <li>ii) for the protection of rare, threatened</li> </ul> </li> </ul>	Y	<ul style="list-style-type: none"> <li>• SQC Standards 2012 Revision 8.1:</li> <li>• Part II, 3.1 For the production of crops compliant with the Renewable Energy Directive growers must comply with the Articles 17(3) to 17 (6), the land based sustainability criteria, of Directive 2009/28/EC of the European Parliament and of the Council, the Renewable Energy Directive, (Renewable Energy directive 2009/28/EC).</li> <li>• Growers must provide information on the area in their current business which was in an arable rotation</li> </ul>

	<p>or endangered ecosystems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature, subject to their recognition in accordance with the second subparagraph of Article 18(4) of the RED;</p> <ul style="list-style-type: none"> <li>• An exception is possible if evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</li> </ul>		<p>(including temporary grass) at the 1st January 2008.</p> <ul style="list-style-type: none"> <li>• If growers are unable to provide information on parts of the land currently cropped, these crops will not be compliant with the Renewable Energy Directive and the grower will be only [be] partially compliant.</li> <li>• Crops (raw materials) must not be obtained from land with a high biodiversity value and / or high carbon stock on or after 1st January 2008. This land is defined as:</li> <li>• <b>High biodiversity value:</b> High biodiversity land is defined as:</li> <li>• Areas designated for protection. These are areas designated:</li> <li>• (i) by law or by the relevant competent authority for nature protection purposes</li> <li>• (ii) for the protection of rare, threatened or endangered eco-systems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature, subject to their recognition in accordance with the second subparagraph of Article 18(4) of the Renewable Energy Directive 2009/28/EC.</li> <li>• (Unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes).</li> <li>• Part II, 3.2.1 Growers must provide information on the area which is in an arable rotation (including temporary grass) for the current year. It must be</li> </ul>
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			<p>established that this area is not from high biodiversity land, high carbon stock or peat land drained since January 2008. Evidence must be provided to the assessor showing the land status at Jan 2008; if this is not available, the land will be assumed as non-compliant to the RED.</p> <ul style="list-style-type: none"> <li>Any area from high biodiversity land, high carbon stock land or peat land drained since January 2008 will not be compliant with the land based sustainability criteria, Articles 17(3) to 17(5) of the Renewable Energy Directive 2009/28/EC.</li> </ul>
2.3 Conservation of highly biodiverse grassland	<ul style="list-style-type: none"> <li>Biofuels and bioliquids shall not be made from raw material obtained from land that was highly biodiverse grassland in or after January 2008, whether or not the land continues to have that status.</li> </ul> <p>Highly biodiverse grassland is defined as:</p> <p>i) natural, namely grassland that would remain grassland in the absence of human intervention and which maintains the natural species composition and ecological characteristics and processes; or</p>	Y	<ul style="list-style-type: none"> <li>SQC Standards 2012 Revision 8.1:</li> <li>Part II, 3.1 For the production of crops compliant with the Renewable Energy Directive growers must comply with the Articles 17(3) to 17 (6), the land based sustainability criteria, of Directive 2009/28/EC of the European Parliament and of the Council, the Renewable Energy Directive, (Renewable Energy directive 2009/28/EC). Growers must provide information on the area in their current business which was in an arable rotation (including temporary grass) at the 1st January 2008.</li> <li>Crops (raw materials) must not be obtained from land with a high biodiversity value and / or high carbon stock on or after 1st January 2008. This land is</li> </ul>

	<p>ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and which is species-rich and not degraded, unless evidence is provided that the harvesting of the raw material is necessary to preserve its grassland status<sup>2</sup></p>		<p>defined as:</p> <ul style="list-style-type: none"> <li>• <b>High biodiversity value:</b> High biodiversity land is defined as:</li> <li>• Permanent grass which has been established for more than five years</li> <li>• Part II, 3.2 Growers must provide information on the area which is in an arable rotation (including temporary grass) for the current year. It must be established that this area is not from high biodiversity land, high carbon stock or peat land drained since January 2008. Evidence must be provided to the assessor showing the land status at Jan 2008; if this is not available, the land will be assumed as non-compliant to the RED.</li> <li>• Any area from high biodiversity land, high carbon stock land or peat land drained since January 2008 will not be compliant with the land based sustainability criteria, Articles 17(3) to 17(5) of the Renewable Energy Directive 2009/28/EC.</li> </ul>
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<sup>2</sup> The European Commission shall establish the criteria and geographic ranges to determine highly biodiverse grassland (RED 2009-28 EC Article 17(3c)). Further information is awaited following the Comitology process.

<b>Article 17(4): Conservation of carbon stocks</b>	<b>Biofuels and bioliquids shall not be made from raw material obtained from land with high carbon stock</b>	
Requirement	Guidance	Assessment
3.1 Conservation of wetlands	<ul style="list-style-type: none"> <li>• Biofuels and bioliquids shall not be made from raw material obtained from land that was wetland in January 2008 and no longer has that status</li> <li>• A wetland is land that is covered with or saturated by water permanently or for a significant part of the year</li> <li>• These provisions shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008</li> </ul>	<div>Y</div> <ul style="list-style-type: none"> <li>• SQC Standards 2012 Revision 8.1:</li> <li>• Part II, 3.1 "For the production of crops compliant with the Renewable Energy Directive growers must comply with the Articles 17(3) to 17 (6), the land based sustainability criteria, of Directive 2009/28/EC of the European Parliament and of the Council, the Renewable Energy Directive, (Renewable Energy directive 2009/28/EC) by providing information on the area in their current business which was in an arable rotation (including temporary grass) at the 1st January 2008. If growers are unable to provide information for parts of the land currently cropped, these crops will not be compliant to the Renewable Energy Directive and the grower will be only partially compliant."</li> <li>• "Crops (raw materials) must not be obtained from land with a high biodiversity value and / or high carbon stock on or after 1st January 2008. This land is defined as:</li> <li>• <b>High carbon stock:</b> namely land that had one of the following statuses in January 2008 and no longer has that status:</li> <li>• Wetlands: namely land that is covered with or</li> </ul>

			<p>saturated by water permanently for a significant part of the year.”</p> <ul style="list-style-type: none"> <li>• Part II, 3.2.1 “Growers must provide information on the area which is in an arable rotation (including temporary grass) for the current year. It must be established that this area is not from high biodiversity land, <b>high carbon stock or peat land drained since January 2008</b>. Evidence must be provided to the assessor showing the land status at Jan 2008; if this is not available, the land will be assumed as non-compliant to the RED.”</li> <li>• “Any area from high biodiversity land <b>and high carbon stock and peat land</b> will not be compliant with the land based sustainability criteria, Articles 17(3) to 17(5) of the Renewable Energy Directive 2009/28/EC.”</li> </ul>
3.2 Conservation of continuously forested areas	<ul style="list-style-type: none"> <li>• Biofuels and bioliquids shall not be made from raw material obtained from land that was continuously forested in January 2008 and no longer has that status</li> <li>• Continuously forested areas are defined as land spanning more than one hectare with trees higher than five metres and a canopy cover of more than 30%, or trees able to reach those thresholds in situ</li> </ul>	Y	<ul style="list-style-type: none"> <li>• SQC Standards 2012 Revision 8.1:</li> <li>• Part II, 3.1 “For the production of crops compliant with the Renewable Energy Directive growers must comply with the Articles 17(3) to 17 (6), the land based sustainability criteria, of Directive 2009/28/EC of the European Parliament and of the Council, the Renewable Energy Directive, (Renewable Energy directive 2009/28/EC) by providing information on the area in their current business which was in an arable rotation (including temporary grass) at the 1st January 2008. If growers are unable to provide</li> </ul>

	<ul style="list-style-type: none"> <li>Continuously forested areas do not include land that is predominantly under agricultural or urban land use. In this context, agricultural land use refers to tree stands in agricultural production systems, such as fruit tree plantations, oil palm plantations and agroforestry systems when crops are grown under tree cover</li> <li>These provisions shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008</li> </ul>	<p>information for parts of the land currently cropped, these crops will not be compliant to the Renewable Energy Directive and the grower will be only partially compliant.”</p> <ul style="list-style-type: none"> <li>“Crops (raw materials) must not be obtained from land with a high biodiversity value and / or high carbon stock on or after 1st January 2008. This land is defined as:</li> <li><b>High carbon stock:</b> namely land that had one of the following statuses in January 2008 and no longer has that status:</li> <li>Continuously forested areas: namely land spanning more than one hectare with trees higher than 5m and a canopy cover of more than 30% or trees able to reach those thresholds in situ.”</li> <li>Part II, 3.2.1 [Text as per section 3.1 above.]</li> </ul> <p>Recommendation:</p> <ul style="list-style-type: none"> <li>It is recognized that SQC only certifies arable crops. The scheme is nevertheless recommended to include text from EC Communication 2010/C 160/02, section 4.2.1 to clarify that continuously forested areas do not include land that is predominantly under agricultural or urban land use. In this context, land under agricultural use refers to tree stands in agricultural production systems, such as fruit tree plantations and agroforestry systems when crops are grown under tree cover.</li> </ul>
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<p>3.3 Conservation of "10-30%" forested areas</p>	<ul style="list-style-type: none"> <li>• Biofuels and bioliquids shall not be made from raw material obtained from land that was sparsely forested in January 2008 and no longer has that status</li> <li>• Sparsely forested areas are defined as land spanning more than one hectare with trees higher than five metres and a canopy cover of between 10% and 30%, or trees able to reach those thresholds in situ, unless evidence is provided that the carbon stock of the area before and after conversion is such that, when the methodology laid down in part C of Annex V is applied, the greenhouse gas threshold (principle 1 above) would still be fulfilled</li> <li>• These provisions shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008</li> </ul>	<p>Y</p>	<ul style="list-style-type: none"> <li>• SQC Standards 2012 Revision 8.1:</li> <li>• Part II, 3.1 "For the production of crops compliant with the Renewable Energy Directive growers must comply with the Articles 17(3) to 17 (6), the land based sustainability criteria, of Directive 2009/28/EC of the European Parliament and of the Council, the Renewable Energy Directive, (Renewable Energy directive 2009/28/EC) by providing information on the area in their current business which was in an arable rotation (including temporary grass) at the 1st January 2008. If growers are unable to provide information for parts of the land currently cropped, these crops will not be compliant to the Renewable Energy Directive and the grower will be only partially compliant."</li> <li>• "Crops (raw materials) must not be obtained from land with a high biodiversity value and / or high carbon stock on or after 1st January 2008. This land is defined as:</li> <li>• <b>High carbon stock:</b> namely land that had one of the following statuses in January 2008 and no longer has that status:</li> <li>• Other woodlands: Land spanning more than one hectare with trees higher than 5m and canopy cover of between 10% and 30%, or trees able to reach those thresholds in situ."</li> <li>• Part II, 3.2.1 [Text as per section 3.1 above.]</li> </ul>
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<b>Article 17(5): Conservation of peatlands</b>	<b>Biofuels and bioliquids shall not be made from raw material obtained from peatland</b>	
Requirement	Guidance	Assessment
4.1 Conservation of peatlands	<ul style="list-style-type: none"> <li>Biofuels and bioliquids shall not be made from raw material obtained from land that was peatland in January 2008.</li> <li>An exception is possible if evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil.</li> <li>For peatland that was partially drained in January 2008 a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.</li> </ul>	<div>Y</div> <ul style="list-style-type: none"> <li>SQC Standards 2012 Revision 8.1:</li> <li>Part II, 3.1 "For the production of crops compliant with the Renewable Energy Directive growers must comply with the Articles 17(3) to 17 (6), the land based sustainability criteria, of Directive 2009/28/EC of the European Parliament and of the Council, the Renewable Energy Directive, (Renewable Energy directive 2009/28/EC) by providing information on the area in their current business which was in an arable rotation (including temporary grass) at the 1st January 2008. If growers are unable to provide information for parts of the land currently cropped, these crops will not be compliant to the Renewable Energy Directive and the grower will be only partially compliant."</li> <li>"Crops (raw materials) must not be obtained from land with a high biodiversity value and / or high carbon stock on or after 1st January 2008. This land is defined as:</li> <li><b>High carbon stock:</b> namely land that had one of the following statuses in January 2008 and no longer has that status:</li> <li>Peatland: Biofuels and bioliquids must not be made</li> </ul>

			<p>from raw material obtained from land that was peatland in January 2008. This includes peatland that was partly drained in January 2008 and that has been subsequently deeper drained. (Unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil)."</p> <ul style="list-style-type: none"> <li>• Part II, 3.2.1 [Text as per section 3.1 above.]</li> </ul>
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## Chain of Custody

Article 18(1): Use of a mass balance system	Economic operators shall use a mass balance system	
Requirement	Guidance	Assessment
5.1 Economic operators shall use a mass balance system	<ul style="list-style-type: none"> <li>The mass balance system:               <ul style="list-style-type: none"> <li>a) allows consignments of raw material or biofuel with differing sustainability characteristics to be mixed;</li> <li>b) requires information about the sustainability characteristics and sizes of the consignments referred to in point (a) to remain assigned to the mixture; and</li> <li>(c) provides for the sum of all consignments withdrawn from the mixture to be described as having the same sustainability characteristics, in the same quantities, as the sum of all consignments added to the mixture.</li> </ul> </li> </ul>	<div>Y</div> <ul style="list-style-type: none"> <li>SQC Standards 2012 Revision 8.1:</li> <li>3.2.2 Mass Balance. There is a requirement for those <b>growers who are only partially compliant</b> to keep a record for each type of crop, where there is a mix of compliant and non-compliant crop in a single bulk. The period covered must not be more than three months, any remaining balance in the bulk being carried over to the next three month period. The quantity of compliant material withdrawn must at no time exceed that which was loaded in. The following records must be available to the assessor at the assessment:               <ul style="list-style-type: none"> <li>A record of the weights for each type of compliant and non-compliant crop going into store</li> <li>Records of loads taken out of store must be kept, with reference to weighbridge tickets</li> <li>The amount of each type of crop for biofuel taken out of store must not at any time exceed the total amount of compliant crop of that type which was</li> </ul> </li> </ul>

			<p>loaded into the store and the balance must be shown at the end of each three month period</p> <ul style="list-style-type: none"> <li>○ If a grower has grain stores in more than one location, each site must have an individual record</li> </ul> <ul style="list-style-type: none"> <li>• In this context Mass Balance means that if for example a 200 tonne bulk contains a mixture of 150 tonnes of produce from land which complies with the sustainability criteria of the Renewable Energy Directive 2009/28/EC and 50 tonnes from land which does not meet these criteria, only 150 tonnes of the bulk can be sold for biofuel production and the other 50 tonnes must be sold for some other use. A store mass balance sheet record is available from <a href="http://www.sqccrops.co.uk">www.sqccrops.co.uk</a>.</li> <li>• SQC Guidance Notes:</li> <li>• SQC 3.2.1 Mass Balance and total production of Crops for Biofuel</li> <li>• Supporting Evidence:</li> <li>• Check that the amount of each crop type delivered for biofuel was grown on land which complied with the sustainability criteria in Standard 3.1</li> <li>• Check that the Mass Balance sheet shows the correct procedure has been followed and that the amount of crop loaded out of store for biofuel does not exceed the amount of compliant crop loaded into the store.</li> <li>• Record findings.</li> </ul>
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			<ul style="list-style-type: none"> <li>• Supplementary information RED(8.1):</li> <li>• Growers will be required to keep a record of crops delivered for liquid biofuel use. These records will be audited at the next assessment, to confirm that all the production for liquid biofuel use came from compliant land (p3).</li> </ul>
5.2 Prevention of double counting/claiming	<ul style="list-style-type: none"> <li>• [No specific text in Directive / Communication]</li> <li>• An information system needs to be included which is able to keep track of the flow of information through the supply chain.</li> </ul>	Y	<ul style="list-style-type: none"> <li>• SQC Standards 2012 Revision 8.1:</li> <li>• 5.1 Growers will be supplied with SQC Passports. The passport is unique to each grower, showing the name, address and membership number of the grower. Purchasers will use these SQC Passports as evidence that produce is of assured status.</li> <li>• 5.2 It is a condition that the SQC Passport is signed by the SQC grower or another authorised signatory to protect the credibility and integrity of the Scheme. Growers are reminded that only the grower or other authorised person should sign the SQC Passport.</li> <li>• 5.3 In order for the passports to reflect compliance with the EU Renewable Energy Directive land use criteria a declaration on the passport must also be signed, if required. Growers must keep a record of the date, tonnage and purchaser of loads being delivered for biofuel.</li> <li>• 5.4 Grain merchants and grain groups will assist with identifying SQC combinable crops in the markets.</li> <li>• 5.5 Grain groups and co-operatives whose entire participation is accredited to SQC standards are</li> </ul>

			<p>permitted to use SQC stickers or the SQC logo. Such stores must be accredited by a recognised merchant scheme for combinable crops.</p> <ul style="list-style-type: none"> <li>• Supplementary information RED(8.1):</li> <li>• Growers are supplied every year with SQC Passports which provide details of the crop type, vehicle and trailer identity, date of loading and other relevant information [...]. The colour of the Passport is changed each year to readily identify the harvest year. The Passport is unique to each grower, showing the name, address and membership number of the grower. The location of the farm can also be identified by the post code.</li> <li>• The membership status of every grower can be confirmed at the point of first delivery by reference to a list updated weekly and sent to participating merchants and processors, or by contacting the SFQC office, or by prior arrangement and by secure password on the SQC web site. [...] Purchasers use these SQC Passports as evidence that produce is of assured status, and in the case of crops destined as raw material for liquid biofuel, that the crop meets the requirements of the Renewable Energy Directive.</li> </ul>
5.3 The mass balance system shall operate at least at the level of a site	<ul style="list-style-type: none"> <li>• The mass balance system shall operate at a level where consignments could normally be in contact, such as in a container, processing or logistical</li> </ul>	Y	<ul style="list-style-type: none"> <li>• SQC Standards 2012 Revision 8.1:</li> <li>• 3.2.1 Mass Balance. <ul style="list-style-type: none"> <li>○ [...]</li> <li>○ If a grower has grain stores in more than</li> </ul> </li> </ul>

	<p>facility or site (defined as a geographical location with precise boundaries within which products can be mixed).</p>		<p>one location, each site must have an individual record</p> <p>Comment:</p> <ul style="list-style-type: none"> <li>The SQC scheme only covers the farm to the first point of delivery. Mass balance requirements are therefore only relevant for the farm. It is implicit in the scheme that the mass balance will only be operated at a single farm level.</li> </ul>
<p>5.4 The mass balance shall specify the timeframe over which the system operates</p>	<ul style="list-style-type: none"> <li>If the balance in the system is continuous in time, a "deficit", i.e. that at any point in time more sustainable material has been withdrawn than has been added, is required not to occur.</li> <li>Alternatively the balance could be achieved over an appropriate period of time and regularly verified.</li> <li>In both cases it is necessary for appropriate arrangements to be in place to ensure that the balance is respected.</li> </ul>	Y	<ul style="list-style-type: none"> <li>SQC Standards 2012 Revision 8.1:</li> <li>3.2.1 Mass Balance. There is a requirement for those <b>growers who are only partially compliant</b> to keep a record for each type of crop, where there is a mix of compliant and non-compliant crop in a single bulk. The period covered must not be more than three months, any remaining balance in the bulk being carried over to the next three month period. The quantity of compliant material withdrawn must at no time exceed that which was loaded in. The following records must be available to the assessor at the assessment: <ul style="list-style-type: none"> <li>A record of the weights for each type of compliant and non-compliant crop going into store</li> <li>Records of loads taken out of store must be kept, with reference to weighbridge tickets</li> <li>The amount of each type of crop for</li> </ul> </li> </ul>

			<p>biofuel taken out of store must not at any time exceed the total amount of compliant crop of that type which was loaded into the store and the balance must be shown at the end of each three month period</p> <ul style="list-style-type: none"><li>• Supplementary information RED(8.1):</li><li>• Use of a mass balance system as described in Article 18.1 (a – c) with a time period of three months, and any balances carried forward to the next period.</li></ul>
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## Recognition of other voluntary schemes

Recognition of other voluntary schemes			
Requirement	Guidance	Assessment	
5.5 Approach to recognition (OPTIONAL: Voluntary schemes are encouraged to include a clause on recognising the potential use of other voluntary schemes for part of a supply chain)	<ul style="list-style-type: none"> <li>In case part of the chain relies on other voluntary schemes, schemes may only recognise voluntary schemes that are recognised by the EC in the context of the Directive 2009/28/EC.</li> <li>Schemes may only recognise the <i>scope</i> of the voluntary scheme that the EC recognises in this context.</li> </ul>	n/a.	SQC does not recognise other voluntary schemes. The SQC scheme only covers the farm to the first point of delivery, therefore recognition of other schemes is not relevant.

## Audit Quality

Assessment of the audit processes of a voluntary scheme is relevant for auditing of the sustainability criteria and auditing of the chain of custody. The level of complexity of a chain of custody is a function of the features that a scheme allows.

RED Article 18(3):

Member States shall take measures to ensure that economic operators submit reliable information and make available to the Member State, on request, the data that were used to develop the information. Member States shall require economic operators to arrange for an adequate standard of independent auditing of the information submitted, and to provide evidence that this has been done. The auditing shall verify that the systems used by economic operators are accurate, reliable and protected against fraud. It shall evaluate the frequency and methodology of sampling and the robustness of the data.

Article 18(3): Adequate standard of independent auditing	Voluntary Schemes need to ensure a sufficient quality of auditing and verification	
Requirements	Guidance	Assessment
6.1. Documentation management	<ul style="list-style-type: none"> <li>The system ensures that economic operators must have a documentation management system.</li> <li>It should be a condition of participation in voluntary schemes that economic operators: <ul style="list-style-type: none"> <li>i) have an auditable system for the evidence related to the claims they make or rely on;</li> <li>ii) keep any evidence for a minimum of 5 years; and</li> </ul> </li> </ul>	<div>Y</div> <ul style="list-style-type: none"> <li>SQC Standards 2012 Revision 8.1:</li> <li>Part I.3.2: The assessment will include an examination of the farm systems (...).</li> <li>Appendix A: During the visit, the Assessor (...) will complete a check list.</li> <li>The SQC voluntary Scheme requires participants to keep records of the farm's activity such as listed below (relevant regarding the RED directive): <ul style="list-style-type: none"> <li>I.5.3 Growers must keep a record of the date, tonnage and purchaser of loads being delivered for biofuel.</li> </ul> </li> </ul>

	<p>iii) accept responsibility for preparing any information related to the auditing of such evidence.</p> <ul style="list-style-type: none"> <li>The auditable system should normally be a quality system drawing on points 2 and 5.2 of Module D1 ('Quality assurance of the production process') of Annex II of the Decision on a common framework for the marketing of products.</li> </ul>	<ul style="list-style-type: none"> <li>II.3.1 If growers are unable to provide information for parts of the land currently cropped, these crops will not be compliant to the RED and the grower will be only partially compliant.</li> <li>II.3.2.1 Growers must provide information on the area (...) for the current year. (...). Evidence must be provided to the assessor showing the land status at Jan 2008: if this is not available, the land will be assumed as non-compliant to the RED.</li> <li>II.3.2.2 There is a requirement for those growers who are only partially compliant to keep a record of each type of crop (...). The following record must be available to the assessor: <ul style="list-style-type: none"> <li>A record of the weights for each type of compliant and non-compliant crop going into store</li> <li>Records of loads taken out of store must be kept, with reference to weighbridge tickets</li> <li>The amount of each type of crop for biofuel taken out of store must not at any time exceed the total amount of compliant crop of that type which was loaded into the store and the balance must be shown at the end of each three month period</li> <li>If a grower has grain stores in more than one location, each site must have an</li> </ul> </li> </ul>
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			<p>individual record</p> <ul style="list-style-type: none"> <li>○ Records shall be kept for at least five years</li> <li>○ II.3.5 Combinable crops handling (...) and record must be kept.</li> <li>○ II.3.6 Combinable fields (...) must have individual records.</li> <li>○ II.4.8 In long term stores each bulk or bin must be labelled with the variety and field(s) of origin. Separate records shall be kept of the variety, the field(s) of origin, the dates and results of regular inspections and details of any crop protection products applied or other remedial treatments.</li> <li>○ II.4.9.1 Grain trailers and other loading equipment must be clean and dry (...). Records must be kept.</li> <li>○ II.4.9.2 Lorries and trailers must be clean and dry (...). Records must be kept.</li> <li>○ II.4.9.3 Crops for biofuels – Growers must keep records of all loads despatched. Records must show if crops has been confirmed for biofuel at time of dispatch, and this must be recorded. These records should be kept for at least 5 years. (...). A crop movement record is available from <a href="http://www.sgccrops.co.uk">www.sgccrops.co.uk</a>. The Assessor will ask to see records of all loads despatched from the farm. If despatched for biofuels this must be recorded".</li> <li>○ SQC - Farm Assurance Scheme Standards, Annex A :</li> </ul>
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			<ul style="list-style-type: none"> <li>○ Production and Harvesting The Assessor will check that every field has a suitable record of the crop management, including variety, sowing date and the amounts of fertiliser, trace elements, growth regulators and crop protection products applied.</li> <li>○ The assessor will check land eligibility for compliance with the RED, and will require information on the area in their current business which was in an arable rotation (including temporary grass*) at the 1st January 2008 (this will be verified by reference to acceptable documentation as proof of land use e.g. Field Data Sheets as part of Single Farm Payment applications made in 2008, and/or maps or datasets setting out areas of high biodiversity value, farm records etc). If this total area has increased since 1st January 2008 then it must be established that this area is not from high biodiversity, high carbon stock land. * Temporary grass: grass in a crop rotation of not more than five years.</li> <li>• SQC Supplementary Information RED 8.1: Record keeping <ul style="list-style-type: none"> <li>○ SQC supplies a "Scottish Quality Crops Farm Record Book" to all growers to assist them to comply with the Standards of the Scheme. Records may be kept in this book or any similar written or electronic system. The records include</li> </ul> </li> </ul>
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			<p>sections for:</p> <ul style="list-style-type: none"> <li>• General information</li> <li>• Farm emergency plan</li> <li>• Guidelines for secure storage of fertiliser on farm</li> <li>• Pesticide store and stock list</li> <li>• Rodent records and bait point location plan</li> <li>• Grain store – Pre harvest hygiene checks</li> <li>• Glass management plan</li> <li>• Grain stores – weekly/monthly checks</li> <li>• A mass balance record (only if partially compliant with RED)</li> <li>• Grain movement record</li> <li>• Sprayer self assessment &amp; calibration checks</li> <li>• Mycotoxins risk assessment for wheat Annual checks</li> <li>• Machinery Annual Checks</li> <li>• Field records</li> <li>• Complaints register</li> </ul> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>• The list of documents checked by assessors mentioned in Annex A should be updated with all documents mentioned in the scheme. For example the documents asked to the farmer in the 4.9.3 (dispatch) is not asked in Annex A.</li> <li>• The SFQC Farm Record Book Sep 2011.pdf provided as evidence should be updated to reflect the list amended in the Supplementary Information document (Mass balance)</li> </ul>
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6.2 Retrospective audits	<ul style="list-style-type: none"> <li>• The voluntary scheme shall arrange for regular, at least yearly, retrospective auditing of a sample of claims made under the scheme. It is the responsibility of the verifiers to define the size of the sample that will permit them to reach the level of confidence necessary to issue a verification statement.</li> <li>• For these audits requirements are that the auditor should be: <ol style="list-style-type: none"> <li>1. Independent of the activity being audited</li> <li>2. Free from conflict of interest</li> <li>3. Competent <ul style="list-style-type: none"> <li>○ Point 1 and 2 mean that the audit shall be carried out by an external third party (not the economic operator)</li> <li>○ Point 3 mean that the auditor has the generic skills and the verification body has the general skills for performing audits; and</li> </ul> </li> </ol> </li> <li>• The auditor has the appropriate specific skills necessary for conducting the audit related to the scheme's criteria and the aspect of the scheme that they are auditing (see 6.5).</li> </ul>	Y	<ul style="list-style-type: none"> <li>• SQC Standards 2012 Revision 8.1:</li> <li>• Page 4 Existing Growers: <ul style="list-style-type: none"> <li>- Subscriptions for participation must be renewed annually. SQC will notify existing growers of their renewal fee prior to the renewal date.</li> <li>- Subscriptions will be calculated using the combinable crop hectareage for the previous year.</li> <li>- Growers' farms will be subject to annual re-assessment. Any re-assessment dates will be fixed by appointment, and may not necessarily be at the same time of year as the initial assessment.</li> </ul> </li> <li>• Part I.3.7 All farms are assessed on an annual basis. Assessments may be at different times of the season.</li> <li>• Part I.4.4 SQC reserves the right to request a random or additional assessment visit to a grower's farm and may take appropriate action on the basis of the report. A random or additional assessment may be at short notice but, as far as possible, will avoid peak sowing and harvesting times.</li> <li>• Part I.4.5 "The TAC reserve the right to suspend any grower who is found to have made false claims at the time of their annual assessment; New for 2012; or in respect of corrective action found at their next annual assessment."</li> <li>• SQC – Additional information, p2: "Each participating grower is subject to an annual audit inspection by SFQC, at a different part of the season each year. When the appointment is made growers are reminded of any changes to the scheme and any new</li> </ul>
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			<p>documentary evidence which will be required. The purpose of this visit is to provide a Report on the applicant's capability to produce combinable crops in a way that conforms to SQC Standards.</p> <p>Additional standards have been added to Part II, Standards for the Production and Harvesting of Combinable Crops to enable the accreditation of crops which may be used as raw materials for the production of liquid biofuels, complying with the land based sustainability requirements of Article 17 (3) to 17(6). of the Renewable Energy Directive 2009/28/EC1. Additional questions will be asked at assessment as to the land classification criteria at 1st January 2008, details of any additional land taken on since that date, and any land converted from protected status at 1st January 2008. The evidence required will be by reference to the Field Data Sheets (IACS 4) submitted with the Single Application Form in 2008, or maps or farm records. From these areas a calculation is made of the area of land which complies with the sustainability criteria of Articles 17(3) to 17(6) of the Renewable Energy Directive 2009/28/EC. Growers must be either fully or partially compliant. This information is held on the SQC database and is made available to traders and processors on the weekly status list referred to above.</p> <ul style="list-style-type: none"> <li>• Growers will be required to keep a record of crops delivered for liquid biofuel use. These records will be audited at the next assessment, to confirm that all the</li> </ul>
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			<p>production for liquid biofuel use came from compliant land. These records must be kept for five years.”</p> <ul style="list-style-type: none"> <li>Refer to 6.5, auditor competencies.</li> </ul>
6.3 Audits before participation to the Voluntary Scheme	<ul style="list-style-type: none"> <li>As a general rule, a voluntary scheme should ensure that economic operators are audited before allowing them to participate in the scheme. There may be exceptions to this rule due to the particular character of certain schemes (for example, schemes that consist only of standard values for greenhouse gas calculations); in these cases, this should be clearly explained when the scheme is put forward for recognition.</li> <li>For these audits requirements are that the auditor should be: <ol style="list-style-type: none"> <li>Independent of the activity being audited</li> <li>Free from conflict of interest</li> <li>Competent <ul style="list-style-type: none"> <li>Point 1 and 2 mean that the audit shall be carried out by an external third party (not the economic operator)</li> <li>Point 3 mean that the auditor has</li> </ul> </li> </ol> </li> </ul>	Y	<ul style="list-style-type: none"> <li>SQC Standards 2012 Revision 8.1:</li> <li>Page 4: New Growers</li> </ul> <p>Application to participate in the scheme must be made on an SQC application form and be accompanied by the appropriate payment. Scheme fees, based on combinable crop area, are shown on current application forms and, if necessary, SQC will be pleased to provide advice.</p> <p>If applicants have more than one farm and, especially if the farms are some distance apart, there may be a need for an additional fee. However, every effort will be made to minimise the costs in such cases.</p> <p>On receipt of an application form with the scheme fee, a new grower pack will be issued and arrangements shall be made for an assessment of the applicant's farm. The purpose of the visit is to provide a report on the applicant's capability to produce combinable crops in a way that conforms to SQC standards. The decision to approve participation will be on the basis of the assessment report.</p> <ul style="list-style-type: none"> <li>Refer to 6.5, auditor competencies.</li> <li>Refer to 6.2, last bullet point (Scope).</li> </ul>

	<p>the generic skills and the verification body has the general skills for performing audits; and</p> <ul style="list-style-type: none"> <li>○ The auditor has the appropriate specific skills necessary for conducting the audit related to the scheme's criteria and the aspect of the scheme that they are auditing (see 6.5).</li> </ul>		
6.4 Group auditing [OPTIONAL – only relevant when group auditing is applied]	<ul style="list-style-type: none"> <li>• Group auditing - in particular for smallholder farmers, producer organisations and cooperatives - can be performed. [Note that group auditing is only permitted for the producers of raw material only, not other economic operators further down the supply chain.]</li> <li>• In such cases, verification for all units concerned can be performed based on a sample of units, where appropriate taking into account a relevant standard developed for this purpose. <ul style="list-style-type: none"> <li>○ What is the basis of the sample size?</li> <li>○ What is the threshold for non-compliance and they apply to the whole group?</li> <li>○ What are the</li> </ul> </li> </ul>	n/a.	<p>SQC Standards 2012 Revision 8.1:</p> <ul style="list-style-type: none"> <li>• Part I, I.3.7 All farms are assessed on an annual basis. Assessments may be at different times of the season.</li> </ul> <p>Comment:</p> <ul style="list-style-type: none"> <li>• Our understanding from the scheme documentation is that a 'group auditing' approach is not permitted within the SQC scheme. We request that this is confirmed by SQC.</li> </ul>

	<p>implications/procedures of non-compliance?</p> <ul style="list-style-type: none"> <li>○ Are downstream parties informed of the non-compliance?</li> <li>• Group auditing for compliance with the scheme's land related criteria is only acceptable when the areas concerned are near each other and have similar characteristics.</li> <li>• Group auditing for the purpose of calculating GHG savings is only acceptable when the units have similar production systems and products.</li> </ul>		
6.5 Auditor competencies	<ul style="list-style-type: none"> <li>• For these audits requirements are that the auditor should be: <ol style="list-style-type: none"> <li>1. Independent of the activity being audited</li> <li>2. Free from conflict of interest</li> <li>3. Competent <ul style="list-style-type: none"> <li>○ Point 1 and 2 mean that the audit shall be carried out by an external third party (not the economic operator)</li> <li>○ Point 3 mean that the auditor has the generic skills and the verification body has the general skills for performing audits; and</li> </ul> </li> </ol> </li> </ul>	Y	<ul style="list-style-type: none"> <li>• SQC Standards 2012 Revision 8.1:</li> <li>• Part I.1.8 Scottish Quality Food Certification (SFQC) Ltd is the Independent Certification Body appointed by SQC to provide the inspection and certification services for the scheme. SFQC operate the SQC Technical Advisory Committee (TAC), which is responsible for advising SFQC on all technical matters relating to the Certification Scheme.</li> <li>• Part I, 2.1 Certification body: All assessments are carried out by an independent body, Scottish Quality Food Certification (SFQC) Ltd. SFQC is EN45011: 1998 (ISO/IEC guide 65: 1996) accredited for SQC Farm Assurance. The accreditation to EN 45011 is carried out by the United Kingdom Accreditation Service</li> </ul>

	<ul style="list-style-type: none"> <li>○ The auditor has the appropriate specific skills necessary for conducting the audit related to the scheme's criteria and the aspect of the scheme that they are auditing.</li> <li>○ Namely:</li> <li>○ Land use criteria: Relevant experience, in agriculture, ecology or similar.</li> <li>○ Chain of Custody system: Experience in mass balance systems, traceability, data handling or similar.</li> <li>○ GHG: Relevant experience in GHG accounting.</li> </ul>		<p>(UKAS) SFQC is the only certification body appointed by SQC to carry out assessments to SQC's Standards.</p> <ul style="list-style-type: none"> <li>• SQC – Supplementary information RED v8.1, p3, §2 : Assessors require either five years industry experience or three years if an appropriate qualification is held, e.g. degree or HND. They complete a training course and undergo a witnessed assessment before being approved to carry out assessments. Approval must be ratified by the TAC and the SFQC Council. Existing assessors undergo refresher training twice a year and are shadow audited on an annual basis. Performance at the shadow assessments is recorded by the Scheme Technical Manager and entered on the assessor's personal file kept in the SFQC Offices. Any improvement required is agreed and monitored. In particular, specific training for the assessors in connection with the RED was given on 6 October 2010, 12 January and 28 September 2011.</li> </ul>
6.6 Management of the audit	<ul style="list-style-type: none"> <li>• Audits shall be properly planned, conducted and reported on</li> <li>• The sustainability system has clear procedures that describe how audits should be conducted</li> <li>• Audit includes the following: <ul style="list-style-type: none"> <li>○ Draw up a verification plan which corresponds to the risk analysis</li> </ul> </li> </ul>	Y	<ul style="list-style-type: none"> <li>• SQC Standards 2012 Revision 8.1:</li> <li>• Part I, 3.1 The initial assessment will be by appointment with the applicant and will be carried out during normal working operations with the applicant in attendance.</li> <li>• Part I, 3.2 The assessment will include an examination of the farm systems and the physical features of the farm and equipment as they relate to the SQC</li> </ul>

	<p>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;</p> <ul style="list-style-type: none"> <li>○ Carry out the verification plan by gathering evidence in accordance with the defined sampling methods, plus all relevant additional evidence, upon which the verifier's verification conclusion will be based;</li> <li>○ Request the operator to provide any missing elements of audit trails, explain variations, or revise claims or calculations, before reaching a final verification conclusion.</li> </ul> <ul style="list-style-type: none"> <li>• ISO 19011: 2002 (plan, do, act, check), or justified equivalent, covers the above requirements.</li> </ul>		<p>standards. Further details are given in Appendix A.</p> <ul style="list-style-type: none"> <li>• Part I, 3.3 The Assessor will note all points on which the farm meets the SQC standards and will also raise any non compliance where the grower fails to meet the SQC standards. A copy of the visit record will be left at the end of the assessment which the grower will be asked to sign. The grower will be asked to provide evidence to the Scheme Office that corrective action has been carried out. A time limit will be agreed with the grower for this corrective action.</li> <li>• Part I, 3.4 In the course of the visit, the knowledge and skills of the individual(s) responsible for management of the combinable crops enterprise may also be assessed. Further details are given in Appendix B.</li> <li>• Part I, 3.5 The applicant will be encouraged to complete a skills assessment form identifying areas where further training of the applicant or farm staff would be an advantage in maintaining SQC standards in the future.</li> <li>• Part I, 3.6 A report of the assessment coded for anonymity will be submitted to the SQC TAC.</li> <li>• Part I, 3.7 All farms are assessed on an annual basis. Assessments may be at different times of the season.</li> <li>• As mentioned in SQC - Farm Assurance Scheme Standards – Part I.3.2, Annex A details what the assessor will check on every farms.</li> </ul>
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			<ul style="list-style-type: none"> <li>SQC - SFQC &amp; TAC.PDF: The SQC scheme operated by SFQC follows the principles of ISO 19011 with a team of assessors providing assessment reports that are relevant and sufficient with assessors working independently from one another to reach the same conclusion in similar circumstances.</li> </ul>
6.7 Establishment of at least a "limited assurance level"	<ul style="list-style-type: none"> <li>A "limited assurance level"<sup>3</sup> implies a reduction in risk to an acceptable level as the basis for a negative form of expression by the auditor such as "based on our assessment nothing has come to our attention to cause us to believe that there are errors in the evidence"</li> </ul>	Y	<ul style="list-style-type: none"> <li>SQC Standards 2012 Revision 8.1:</li> <li>All SQC members are audited annually. The level of assurance is a function of the data verified on farms. The output can only be compliant/partly/non compliant, as detailed in SQC - Farm Assurance Scheme Standards - 8.1.</li> <li>"All non-conformances against the Standards must be rectified. Standards are categorised as "minor" or "major" which is identified within the Standards as a margin note. New for 2012"</li> </ul> <p>The applicant will be notified of the assessment outcome. The possible decisions are as follows:</p> <p><b>Category 1:</b> Unconditional approval with no non-compliances highlighted during the assessment. A reassessment visit may be carried out at any time. Compliance with the Renewable Energy Directive will be listed as compliant or part compliant for biofuels.</p> <p><b>Category 2:</b> Conditional approval with one or more minor non-compliances. The timescale for addressing</p>

<sup>3</sup> A stronger "assurance level" is the "Reasonable assurance level". Reasonable assurance 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".

			<p>non-compliance(s) will be agreed with the assessor, this is usually 1 month. Growers will be asked to supply evidence to the SQC office that non-compliance(s) have been rectified. Alternatively a reassessment visit may be required.</p> <p>Failure to submit corrective action within the given timescale will result in participants being deferred (Category 3).</p> <p><b>Category 3:</b> Participation deferred pending the completion of corrective action to address:</p> <ul style="list-style-type: none"> <li>- Major non-compliance(s) or minor non-compliances not addressed within given timescale. Growers will be required to supply evidence to the SQC office that non</li> <li>- compliance(s) have been rectified. Alternatively a reassessment visit may be required.</li> </ul> <p>Where a revisit is required a fee may be charged to the applicant/grower.”</p> <ul style="list-style-type: none"> <li>• SQC has clarified that the default timescale is 1 month, but in cases where this is not possible (e.g. where a grain store has been damaged by fire or collapsed by snow), a timescale will be agreed with the assessor. Guidance to assessors on this is provided in training.</li> </ul> <p>Recommendation:</p> <ul style="list-style-type: none"> <li>• The scheme could indicate more explicitly that the timeline for addressing non-conformances is one month by default, unless otherwise specified by the assessor (as outlined above).</li> </ul>
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6.8 Accreditation	<ul style="list-style-type: none"> <li>• Accreditation by a national accreditation body affiliated to the International Accreditation Forum (IAF); or</li> <li>• Accreditation as a full member or 'associate' member of ISEAL; or</li> <li>• 'Commitment to comply' with ISO 17011: 2004 (General requirements for accreditation bodies accrediting conformity assessment bodies), or justified equivalent, within 3 years (consistent with ISEAL associate member)</li> </ul>	Y	<ul style="list-style-type: none"> <li>• SQC Standards 2012 Revision 8.1:</li> <li>• 2.1 The accreditation to EN 45011 is carried out by the United Kingdom Accreditation Service (UKAS) SFQC is the only certification body appointed by SQC to carry out assessments to SQC's Standards"</li> </ul>
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