

Solid biofuel certification
ENAMA Agroenergie Schema

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APPROVAL

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1. INTRODUCTION

This document describes all the rules and responsibilities relating to the product, process and service certification process (hereinafter "product") in the voluntary sector of solid biofuels, such as: pellets, briquettes, firewood, wood chips. Both the Client (the person requesting certification) and ENAMA Servizi must follow the procedure below.

The Client, upon the successful conclusion of the certification process, receives a certificate and has the right to affix the mark issued by ENAMA Servizi for the products subject to certification to the products and other information material, in compliance with this regulation.

The purpose of the certification activity is to provide, with an adequate level of confidence, independent assurance that an organization's product meets the requirements of the reference documents.

2. NORMATIVE REQUIREMENTS

- UNI EN ISO 17225 – 1 Solid biofuels - Specifications and classification of the fuel – Part 1: General requirements.
- UNI EN ISO 17225 – 2 Solid biofuels - Specifications and classification of the fuel – Part 2: Wood pellets.
- UNI EN ISO 17225 – 3 Solid biofuels - Specifications and classification of the fuel – Part 3: Wood briquettes.
- UNI EN ISO 17225 – 4 Solid biofuels - Specifications and classification of the fuel – Part 4: Wood chips.
- UNI EN ISO 17225 – 5 Solid biofuels - Specifications and classification of the fuel – Part 5: Firewood.
- UNI EN ISO 17225 – 6 Solid biofuels - Specifications and classification of the fuel – Part 6: Non-wood pellets.
- UNI EN ISO 17225 – 7 Solid biofuels - Specifications and classification of the fuel – Part 7: Non-wood briquettes.
- UNI EN 15234 - 1 Solid biofuels - Fuel quality assurance - Part 1: General requirements.
- UNI EN 15234 - 2 Solid biofuels - Fuel quality assurance – Part 2: Wood pellets for non-industrial use.
- UNI EN 15234 - 3 Solid biofuels - Fuel quality assurance – Part 3: Wood briquettes for non-industrial use.
- UNI EN 15234 - 4 Solid biofuels - Fuel quality assurance – Part 4: Wood chips for non-industrial use.
- UNI EN 15234 - 5 Solid biofuels - Fuel quality assurance – Part 5: Firewood for non-industrial use.
- UNI EN 15234 - 6 Solid biofuels - Fuel quality assurance – Part 6: Non-wood pellets for non-industrial use.
- UNI EN 14778 – Solid biofuels – Sampling.
- UNI EN 14780 – Solid biofuels – Sample preparation.
- UNI EN ISO 9001 – Quality management system – Requirements.

- UNI EN 14588 – Solid biofuels – Terminology, definitions and description.
- UNI CEI EN ISO/IEC 17065 - Conformity assessment - Requirements for bodies that certify products, processes and services

3. ABBREVIATIONS AND DEFINITIONS

The following terms and abbreviations (acronyms) are used or referred to in this Regulation:

AC	Corrective actions
LAB:	Test laboratory
NC:	Non-compliance
OdC:	Certification Body
Negative;	Inspection Body
PRD:	Product Certification

Major Non-Conformities: concern the discrepancies from the provisions of the standards relating to the functionality of the plant, of the internal quality control system which directly influences the quality of the product. The applicant/*Certified company* must identify the cause of the Major Non-Conformities and correct them. Following the reporting of the findings by the Inspector in charge of the verification, ENAMA Servizi S.r.l. will evaluate whether a new inspection visit is necessary or whether the verification of the correction of the Non-Conformity can be evaluated differently (e.g. through photographic/video evidence).

Certification is not granted (or confirmed) before the adoption of corrective actions which must be taken within a pre-established deadline. From the date of sending the report, the Client, based on the type of findings found, has up to 3 months to undertake corrective actions to resolve the non-conformities identified at the time of the visit. In detail:

- **Major Non-Conformities** found during the first verification or renewal must be resolved and verified by the CB before (re)issuing the certificate.
- **Major Non-Conformities** found during the surveillance or inspection/additional test must be resolved and verified by the CB no later than three (3) months from the date of surveillance or inspection/additional test.
- **Major Non-Conformities** not resolved or which corrective actions are deemed ineffective by the CB within the established period will give rise to the suspension or revocation of the certificate.

Minor Non-Conformities: can affect the quality of the final product. If Minor Non-Conformities are not corrected, they can turn into Major Non-Conformities. Minor Non-Conformities are reported in the Audit Report. The applicant/*Certified Company* must indicate the methods and timing for resolving Minor Non-Conformities.

- **Minor Non-Conformities** must necessarily be resolved before the Certificate is issued.

- **Minor Non-Conformities** identified during surveillance, renewal or further inspections/tests, must be corrected by the date established by the CB. The date must be set before the date of the next surveillance or renewal inspection.

- the correction must be verified by the CB at the latest during the next surveillance or renewal inspection. Minor nonconformity that has not been corrected, or for which corrective action has been ineffective, must be classified as a major nonconformity.

Observations: these are minor inconsistencies that do not represent a risk of inadequacy of the product with the requirements and therefore are not considered Non-Conformities, but can have a potential impact on the conformity of the product, process or management system to the requirements of the scheme. This type of finding can be managed by the Client with the opening of an improvement action, or it can be ignored; in this second case the reasons must be recorded.

The **Observations** are reported in the inspection report.

4. REQUIREMENTS AND DUTIES OF THE CUSTOMER

The certification of solid biofuels of agroforestry origin can be requested by any Organization or Person without any impediments/limitations and without posing financial or other impediments (pursuant to par. 4.4.1, 4.4.2 and 4.4.3 - EN ISO/IEC 17065). All requests will be regularly logged and analyzed. Requests must be drawn up using the specific certification request form which will be examined by ENAMA Servizi S.r.l. within 7 days from the date of receipt.

In order to obtain and maintain ENAMA Servizi S.r.l. certification, the Client must respect and document the application of all the applicable requirements of the reference regulations for certification, of the additional requirements defined by ENAMA Servizi S.r.l. (see following paragraph) and by 'Accreditation body, as well as the provisions of this document and those referred to in it.

The Client is required to communicate to ENAMA Servizi S.r.l. any legal proceedings and/or sanctioning measures by competent authorities, in relation to aspects related to the management system subject to certification.

The Client may request multi-site certification whose eligibility criteria and requirements are defined in the specification in Annex 1.

Upon receipt of the application, ENAMA Servizi S.r.l.:

- the preliminary examination of the documentation presented.

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- to communicate to the Client the acceptance of the application or the reasons for non-acceptance, possibly requesting further documentation.

Following the positive examination of the application, ENAMA Servizi S.r.l. will send the following documentation to the Client: contract (CO 01) complete with estimate, this regulation (RG 01) and the specific specifications. The Client must comply with the following points (pursuant to UNI CEI EN ISO/IEC 17065 – point 4.1.2.2):

- always satisfy the certification requirements, committing to implement the appropriate changes when these are communicated by the Certification Body;
- for ongoing production, ensure that the certified product continues to meet the product requirements;
- adopt all necessary provisions to:
 - (1) conducting the assessment and surveillance, including the provision of documentation and records for the purpose of the assessment and access to relevant equipment;
 - 2) the investigation and management of complaints;
 - 3) the participation of observers, if applicable and/or requested;
- make claims regarding the certification of solid biofuels only in reference to the purposes for which the certification was issued;
- not use the certification of solid biofuels in such a way as to bring discredit to the certification body and not make statements regarding the product certification that could be considered incorrect or unauthorized by ENAMA Servizi S.r.l.;
- following the suspension or revocation of the certification of solid biofuels, cease using all advertising material containing the relevant references and return any certification document upon request from ENAMA Servizi S.r.l. and undertake any other measure requested by ENAMA Servizi S.r.l.;
- when providing copies of certification documents to others, these must be reproduced in their entirety or as specified in the certification scheme;
- use the solid biofuels certification only to indicate that the products are certified in compliance with specific reference standards;
- behave in such a way as to ensure that no certificate and/or report, or part thereof, is used incorrectly;
- when referring to the certification in the media, such as documents, illustrative material or advertising, behave in accordance with the requirements of ENAMA Servizi S.r.l. and Biomassplus if applicable;
- maintain a record of all complaints submitted and make such records available to ENAMA Servizi S.r.l., including the appropriate actions taken in relation to any defect found in the product and related documentation;

- inform ENAMA Servizi S.r.l., without delay, of any changes that may affect the ability to satisfy the certification requirements.

Furthermore, the client must allow access to its premises by ACCREDIA Inspectors (exclusively in the capacity of verifiers of ENAMA Servizi S.r.l.' work), even with a minimum notice of 7 working days, under penalty of failure to grant certification or suspension or revocation of certification in case of subsequent failure to comply with the same obligation.

5. CERTIFICATION SCHEME

This certification scheme has as its object the following solid biofuels: pellets, wood chips, briquettes, firewood. For certification purposes, some aspects of the production system and management system are subjected to verification according to specific standards.

This scheme provides that laboratory analyses, if required, are carried out by external testing laboratories accredited or qualified by ENAMA Servizi S.r.l. itself. ENAMA Servizi assumes responsibility for any tests entrusted to the external laboratory.

ENAMA Servizi S.r.l. appoints appropriately qualified internal or external inspection personnel to carry out the checks (RG 02). Following the verification, the inspector in charge sends the report to the Technical Certification Manager of ENAMA Servizi S.r.l. who evaluates its content and, after having received any clarification and made any changes to it, sends it to the Client together with the specific form (Mod.P) for the management of Non-Conformities if these are present.

In the event of Major Non-Conformities, ENAMA Servizi S.r.l. may request a new audit to be carried out.

The Client, if non-conformities have been found (see chapter 3), is invited to indicate on this form the causes that led to the Non-Conformity and the corrective actions it intends to undertake to overcome it, this form must then be sent to ENAMA Servizi S.r.l. with any documentation.

The evaluation of the corrective actions and the documentation received from the Client is the responsibility of the Technical Certification Manager in concert with the Inspector who conducted the verification who may request any additions to the Client. Following the positive evaluation of the corrective actions undertaken, the documentation is sent to the technical office of ENAMA Servizi S.r.l. (see par.5.2) to proceed with the resolution.

Before the evaluation by the Deliberating Committee, the completeness of the documentation received is checked by a Technical Office Manager as the proposing figure who, in the event of a positive evaluation, makes the documentation available for the subsequent resolution.

In the event of a positive outcome from the Committee, ENAMA Servizi S.r.l. informs the Client and, following payment of the amount due, proceeds with the issuance of the certificate.

5.1 Request for certification

The Client requests certification from ENAMA Servizi S.r.l. by completing "Form A" which must be duly completed and signed by the legal representative.

Form A gives the Client the opportunity to indicate to ENAMA Servizi S.r.l. a testing laboratory to which to send the sample. The economic relationships with the testing laboratory are managed by Enama Servizi. The testing laboratory must ensure that the requirements of ISO/IEC 17025 are met.

ENAMA Servizi S.r.l. examines the completeness of the request received with Form A and processes and transmits an economic offer complete with all the information relating to the activities carried out and the prices based on the price list in force (TA 00). At the same time as the offer, Enama Servizi sends the contract (CO 01) connected to it and this Regulation (RG 01).

To proceed with the certification activity, the Client must return the contract (CO 01), the offer and this Regulation (RG 01) duly completed, stamped and signed. After receiving the acceptance, ENAMA Servizi S.r.l. issues the advance invoice. Upon receipt of payment, the certification process and related timing are activated. In the event that the Client, before starting the activities, decides not to proceed further, he will have to comply with what is stated in the contract (CO 01) signed by him.

5.2 Verification of producers of pellet

Limited to the verification of pellet producers, this consists of two phases:

- **DOCUMENTAL VERIFICATION:** the client must provide the minimum required procedures and documented information relating to the management of the quality system as requested via a specific document (annex 1 to PV 02.05). The Inspector in charge will have to verify the conformity of the documentation provided by the Client and any lack of documentation will be communicated to the applicant by the verification team.
- **ON-SITE INSPECTION:** The on-site inspection is carried out only and exclusively following the presentation of the minimum documentation required during the documentary verification. The date and time of the inspection are agreed with the appointed verification team and will be officially communicated to the applicant via a specific visit plan following the conclusion of the documentary verification. During the on-site inspection, the verification team identifies an appropriate sampling point and takes a sample of the production. During the inspection, the conformity of the systems is verified, including the storage areas of raw

materials and finished products, and all the equipment and tools for self-control.

5.3 Documentation evaluation

The activity consists in the evaluation of the documentation transmitted by the Inspector in charge of the verification in order to verify that this documentation is complete and compliant with the certification scheme.

This documentation consists of the verification report and any documentation taken during the audit phase and, if applicable, the results of the analyzes released by the Test Laboratory on the product sample(s) taken during the verification.

The ENAMA Servizi S.r.l. Technical Office verifies the completeness of the documentation received and in case of incompleteness or doubts about what is reported, it can ask the Inspector for clarifications or further details. Furthermore, ENAMA Servizi evaluates whether the NCs indicated in the report comply with the evidence reported in the report itself and that they have the right gradation, also compared to similar NCs found during other checks.

The presence of NC is reported in the verification report and each is reported on a specific form P.

The Client must analyze the causes and describe them on Form P together with the corrections and specific corrective actions adopted or planned to eliminate, within a pre-established time, the non-conformities detected.

The processing and corrective actions will be evaluated by the technical contact person of ENAMA Servizi S.r.l. who may request further additions and shared with the Inspector in charge of the verification.

Regarding the NCs, it should be noted that the Major ones can give rise to two distinct actions:

1. NC Major referring to structural aspects that influence the quality of the product or in case of non-compliant parameters; in this case ENAMA Servizi S.r.l. may request a second check to be carried out;
2. NC Maggiore referring to the quality management system of a documentary nature; the certification cannot be issued without a positive evaluation of the corrective actions proposed by the Client and having read the missing documentation.

It is specified that: a) the **major non-conformities** identified in the initial and renewal inspections/tests must be corrected and the corrections verified by the Enama Servizi Technical Office before issuing the certificate.

b) and **major non-conformities** identified during the surveillance or additional inspection/test must be corrected and the corrections

verified by the Enama Servizi Technical Office no later than three months from the date of surveillance and/or additional inspection/test;

As regards the **minor non-conformity** identified during the initial inspection/test, this must be corrected and the correction verified by the Enama Servizi Technical Office before issuing the certificate.

The **minor non-conformity** identified during the surveillance or renewal verification or further inspections/tests, must be corrected by the date set by the Technical Office which must in any case be prior to the date of the next surveillance or renewal inspection, the correction must be verified by Enama Servizi by and no later than the next surveillance or renewal inspection.

If the outcome of the Committee is negative, ENAMA Servizi S.r.l. informs the Client of the need for further verification.

If the outcome of the Committee is positive, ENAMA Servizi S.r.l. issues the certificate.

5.4 Issuance of the certificate

The issuing of the ENAMA Agroenergie certificate is linked to:

- Positive outcome by the Deliberating Committee;
- payment of the balance of what is indicated in the signed estimate including any travel expenses.

Biomassplus logo

As regards the certification of solid biofuels such as wood chips, firewood, briquettes, ENAMA Servizi S.r.l. is a Certification Body which, in agreement with Aiel, can issue the voluntary Biomassplus logo; the ID number that accompanies this trademark is granted by Aiel according to the aforementioned agreements. The Biomassplus logo (and ID number) are included in a certificate other than the ENAMA Agroenergie and its use is regulated by AIEL as indicated in the specific guidelines that the Client declares to know and accept upon signing the Contract which regulates relations with ENAMA Servizi (CO 01 - 2; CO 01 - 4).

5.5 Validity of the certification

The certification is valid for 3 years from the date of issue except in cases where there are variations in the reference standards relating to the

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product/process examined or in the case of modifications which make the standard product/process no longer compliant with the certified one or other events of a technical and/or legal nature.

The certification issued is valid only for the product/process subjected to the initial testing activities and compliant with the technical documentation of the evaluated product.

Once the certification has been obtained, the Client is required to promptly inform ENAMA Servizi S.r.l. in writing of any changes it intends to make to the product, the production and/or distribution process or the quality system likely to affect the conformity of the product with the standards ; ENAMA Servizi S.r.l. based on the information received, determines whether:

- a) the changes made do not alter the certification conditions and can be verified during the first scheduled audit without further checks and/or tests;
- b) the changes made alter the certification conditions and verification activities and/or additional tests are required; in this case the verification activity may be subject to revision of the contractual terms or specific quotation/offer by ENAMA Servizi S.r.l.;
- c) the changes made are such as to require a new certification (See Renewal chapter 6);
- d) it is appropriate to suspend the use of the ENAMA Agroenergie certificate and brand until ENAMA Servizi S.r.l. has notified its consent.

5.6 Surveillance checks

Surveillance is strictly necessary to control the certification activity carried out by ENAMA Servizi S.r.l..

ENAMA Servizi S.r.l., during the validity period of the ENAMA Agroenergie certification of solid biofuels, carries out periodic surveillance to ensure continuous compliance with the provisions of the certification procedures and the Regulations.

ENAMA Servizi S.r.l. has the right to carry out all the necessary checks in reference to the certification procedures for solid biofuels to check compliance by the Client with all the commitments undertaken.

For the surveillance activity there is a cost for the Client as reported in the contract and offer for the certification of solid biofuels signed by the Client.

For the purposes of maintaining the certificate, the surveillance check is carried out in the field (at the client's headquarters) annually from the date of issue of the certificate. For some types of certification (see paragraph 5.6 below) which do not require product sampling, ENAMA Servizi S.r.l. reserves the right to carry out remote surveillance checks. If

the client does not allow the surveillance audit to be carried out within the established timeframes, ENAMA Servizi S.r.l. may proceed with the suspension of the certificate. ENAMA Servizi S.r.l. may request extraordinary audits at its discretion.

A more restricted surveillance activity may be requested by ENAMA Servizi S.r.l. in the case of particular situations due to specific needs (non-conformities emerging during subsequent checks, complaints written and verified by ENAMA Servizi S.r.l., etc.); in this case, the Client is promptly notified of the need for further checks due to possible non-conformities. These in some cases may be unscheduled (5.7).

5.7 Remote surveillance checks

In the circumstances reported below, ENAMA Servizi S.r.l. can carry out surveillance checks remotely.

The remote surveillance verification is carried out without the Inspector going to the Client's premises, but by requesting documentary evidence from the latter in order to verify the maintenance of the requirements required by the certification and resorting, if necessary, to remote connections via platforms digital.

The cases for which ENAMA Servizi S.r.l. can carry out checks on a documentary basis concern the following types:

- a) surveillance inspections of a trader of bulk pellets;
- b) inspections (initial, surveillance and renewal) of a trader of bulk pellets without physical contact with the pellets that does not contract to a service provider;
- c) audits (initial, surveillance and renewal) of a trader of bagged pellet that does not operate a bagging station (including bagging by a service provider);
- d) surveillance audits of the service provider who carries out:
 - 1. small-scale delivery of bulk pellets;
 - 2. storage of bulk pellets intended to be delivered to end users.
- e) inclusion of additional storage sites within a multi-site organization.

ENAMA Servizi S.r.l. may consider the possibility of carrying out remote checks in the following special cases:

- a) War events in progress in the country where the Client's production site is located;
- b) Sanitary emergency in the country where the Client's production site is located;

The decision to carry out a remote audit will be taken by Enama Servizi after a feasibility assessment and risk analysis and communicated to the Client before carrying out the audit itself.

ENAMA Servizi S.r.l. will directly request the Client to send the documentation necessary for the evaluation of:

- a) compliance with the requirements set out in the certification scheme;
- b) conformity of the distribution process (Declaration on the lack of modifications to the equipment, Form O – Nothing Changed);
- c) possible presence of complaints.

ENAMA Servizi S.r.l. reserves the right to:

- Request integration of documentation or photos of details if you consider there are particularly critical points;

assign an inspector to carry out a surveillance check in the field and activate the specific procedure if he has doubts about compliance.

5.8 Unscheduled surveillance inspections

ENAMA Servizi S.r.l. reserves the right to carry out additional checks and/or tests relating to the certified product/process, without notice or with 48 hours' notice, to verify that the conditions of conformity are maintained. These checks are generally carried out when ENAMA Servizi S.r.l. has valid reasons for requesting them, such as complaints and information regarding non-compliance with the certification conditions, improper use of the certification or brand, etc. The costs of the aforementioned verification and/or additional testing activities, if non-conformities are found, they may be borne by the Client. On the contrary, if the verification certifies its compliance, the costs will not be borne by the Client, but by ENAMA Servizi S.r.l..

5.9 Unannounced annual sampling of pellets

ENAMA Servizi S.r.l., in order to verify the maintenance of the product requirements foreseen by the pellet certification, will carry out a further unplanned annual sampling of the product which will be subjected to complete analysis. In this case the Client will be notified of the sampling within 48 hours prior to the inspection. The cases in which this additional sampling is envisaged are:

- a) producers of pellets both bulk and in bags;
- b) traders with packaging station;
- c) Certified service providers carrying out packaging activities.

ENAMA Servizi S.r.l. reserves the right to apply different organizational provisions for the collection of samples (e.g. sampling during video calls) provided that the times, the method and the collection itself remain under its control. These possibilities can be foreseen in the case of sampling in territories with ongoing health emergencies or war events.

5.9 Multi-site organization

Certification of a Multisite Organization is envisaged according to the criteria set out in Annex 1 to this regulation.

Multisite is defined as an organization that has a headquarters and multiple operational units and/or temporary sites that carry out activities similar to those carried out at the headquarters.

These locations may have distinct legal entities; in such cases there must be a well-defined contractual relationship between the site and the Central Office.

In order to consider the organization as operating in Multisite, all the following requirements must be met.

If only one of them is missing, the certification procedure as a Multisite cannot be managed:

- The services (products) provided by all sites must be of a similar type and must be provided (products) following the same methodologies and procedures;
- The SG must be managed by the headquarters and must be subject to controls by the same; an internal audit program must be provided for all sites;
- Demonstration of management of all sites by the central organization through the collection and analysis of all data from the sites.

5.9.1 Multi-site certification required

In the case of Multisite certifications, the organization must complete the appropriate form attached to the application.

5.9.2 Multisite certification audit

See Annex 1 to this Regulation

6. RENEWAL OF CERTIFICATION

In the following cases, the certification must be subjected to a renewal procedure to maintain its validity:

1. three-year maturity;
2. changes in the reference standards (considered significant in the opinion of ENAMA Servizi S.r.l.) or other events of a technical and/or legal nature;
3. if the Client makes changes (deemed significant in the opinion of ENAMA Servizi S.r.l.) to the product/process compared to that subjected to checks at the time of certification of solid biofuels.
4. changes to certification requirements.

In cases of 1. three-year maturity; 2. change in the reference standards and 4. changes to the certification requirements, the renewal procedure will be started by ENAMA Servizi S.r.l. by means of a written communication which will be sent, only in the case of a three-year expiry, 7 (seven) months before the expiry of the certificate. In this case the verification must be carried out before the expiry date of the certificate (but not before 6 months from expiry), in order to ensure that the certificate renewal process is completed by the expiry date.

In the event of regulatory changes or modifications to certification standards, the renewal procedure will always be started by ENAMA Servizi S.r.l. in compliance with the expected transition period.

However, if the Client makes changes to the product/process, the latter will be responsible for activating the renewal procedure by means of a written request to be sent to ENAMA Servizi S.r.l.. In the event that the Client does not send the request, the certification subject to renewal will be considered lapsed and ENAMA Servizi S.r.l. may proceed with the suspension and/or revocation of the certificate.

In any case, ENAMA Servizi S.r.l. assumes no responsibility for the Client's decision not to adapt the product/process.

If the Client does not allow the inspection activity to be completed, including the verification of any corrective actions, within the established timeframes, the renewal certificate cannot be issued and the validity of the certification cannot be extended.

After the certification expires, ENAMA Servizi S.r.l. can issue a new certificate within 6 months, provided that any pending renewal activities are completed. Otherwise, a new certification process must be undertaken.

7. EXTENSIONS

The extension of the certificate relating to the same product to different quality classes and to more types of activities and to different products is envisaged. Following a specific request, even after the issuing of the certificate, ENAMA Servizi S.r.l. will send a specific quote and, once accepted, will proceed with the necessary documentary verification; if so, the name of the new commercial product will be added to the attachment to the certificate relating to that product.

8. USE OF THE LICENSE, CERTIFICATE AND MARK OF CONFORMITY

ENAMA Servizi S.r.l. exercises control over property rights, use and display of trademarks and certificates **ENAMA Agroenergie**. Any reference to the

incorrect certification system or incorrect use of the brand and certification in advertising, catalogs etc. leads to the suspension of certification.



Fig.1. The ENAMA A brandgroenergie

The concession of use of the ENAMA Agroenergie logo according to the criteria of this procedure, it is issued by ENAMA Servizi S.r.l. to companies that have obtained certification for one of their products/processes.

Each certified producer and trader has a specific certification mark for each quality class of the solid biofuel that he produces and/or distributes.

By signing the certification contract, the Client undertakes to always operate according to the ENAMA Servizi S.r.l. certification rules.

The ENAMA Agroenergie logo can be affixed to each product (understood as packaging, tank trucks, etc.) compliant with the certified one.

Certified companies that produce or market both certified and non-certified solid biofuels must ensure that the entire line of distributed products appears certified. Consequently, the ENAMA Agroenergie logo may only appear on the documentation relating to the certified product/process, and this must occur in accordance with the criteria graphically illustrated in Figure 1, and in particular by reporting the number corresponding to the certificate. The mark can only be affixed to the documentation relating to the certified product/process and cannot appear on documents that include products other than solid biofuels.

The ENAMA Agroenergie logo can be used on the Client's advertising material exclusively if such material refers, in whole or in part, to certified products (solid biofuels), adopting the same criteria as in the previous point.

The ENAMA Agroenergie logo can be reported on the price lists of companies with certified products. However, if the aforementioned price lists contain products that are not ENAMA Agroenergie certified, the latter must be identified as such.

Companies must explain to their customers the meaning and importance of ENAMA Agroenergie Certification, for the purpose of recognition, on both the

domestic and foreign markets, of the quality of ENAMA Agroenergie certified products.

For all other aspects, reference can be made to the Contract between ENAMA Servizi S.r.l. and the Client (CO 01).

Use of the Biomassplus logo: As regards the certification of other solid biofuels, ENAMA Servizi S.r.l. is a Certification Body which, in agreement with Aiel, can issue the conformity of the product to the requirements required for the issuing of the voluntary Biomassplus logo which together with the ID number accompanying this trademark is granted by Aiel according to the aforementioned agreements. The Biomass plus brand (and ID number) are included in a specific certificate and its use is regulated by AIEL according to what is indicated in the specific guidelines that the Client declares to know and accept upon signing the Contract which regulates relations with ENAMA Servizi S.r.l. (CO 01).

9. SUSPENSION AND REVOCATION OF CERTIFICATION

9.1 Suspension of certification

ENAMA Servizi S.r.l. has the right to temporarily suspend the Certificate if the Client:

- is not up to date with the payments required by the contract;
- does not comply with the conditions detailed in this regulation;
- is unable to ensure the regular carrying out of surveillance activities and the regular carrying out of the planned verification activities;
- non-compliances are found during the surveillance visit;
- makes improper use of the Trademarks and/or Certificates;
- does not handle complaints correctly;
- does not resolve Non-Conformities within the expected timescales and effectively;
- does not inform ENAMA Servizi S.r.l. about substantial facts that may affect the conformity of the product with the reference standards;
- Does not allow ACCREDIA Inspectors access to its offices;

In case of suspension, ENAMA Servizi S.r.l. sends a notification to the Client with the reasons and conditions under which the provision can be revoked, as well as the limitations on the use of the certificate and the ENAMA Agroenergie certification mark.

The suspension will also be reported on the website www.enamaservizi.it.

If the ENAMA Agroenergie certificate is suspended, the Client must not use the certificate and must not supply products with the certification mark.

When ENAMA Servizi S.r.l. verifies that the Client has eliminated the causes of suspension, the same is revoked by informing the Client; if the suspension continues beyond the deadline indicated in the notification, ENAMA Servizi S.r.l. will revoke the Certificate.

9.2 Revocation of certification

ENAMA Servizi S.r.l. may revoke the ENAMA Agroenergie Certificate if the causes that led to the suspension are not resolved within the deadline indicated in the suspension notification and in any case no later than 6 months from the date of suspension.

The revocation is carried out following communication by the Client of the cessation of production and/or distribution or other reasons.

Furthermore, the revocation of the certificate can be requested by ACCREDIA or by whoever is entitled to do so.

The revocation of the certificate will be officially notified to the Client. Starting from the date of revocation, the Client is required to no longer use the certificate and any documentation attesting to its certification. The revocation will be communicated to Accredia via email.

If the certificate is revoked, it no longer appears on the website www.enamaservizi.it.

The withdrawal or cancellation of the certification can also be made public by ENAMA Servizi S.r.l. via the same website.

10. COMPLAINTS, APPEALS AND DISPUTES

The Client has the right to submit complaints or appeals in written form. The complaint is the manifestation of dissatisfaction of the Client in relation to administrative and technical aspects of the activities carried out by ENAMA Servizi S.r.l.. Enama Servizi will communicate the acceptance of the complaint and send a written response to the Client within 7 days of receiving it.

The appeal is the explicit and documented manifestation of non-acceptance of the decisions adopted by ENAMA Servizi S.r.l. in the context of verification and certification activities. The dispute arises from any non-acceptance by the Client of the decisions communicated in response to the appeals.

The complaints, appeals and disputes regarding the certification of solid biofuels presented to ENAMA Servizi S.r.l. by the Client are recorded and stored in order to produce the appropriate remedies through suitable

consequent actions which must be adopted verifying their effectiveness.

In all phases of the solid biofuel certification procedure, the Client can highlight problems, complaints and doubts using the appropriate forms (Form N) downloadable from the ENAMA Servizi S.r.l. website.

For any dispute, reference will be made to the Court of Rome.

10.1 Management of complaints, appeals and disputes

The complaint can be addressed to ENAMA Servizi S.r.l. which will register it, analyze the situation of dissatisfaction described and give a written response to the undersigned within 20 days of receipt.

The appeal must be addressed to the management within 15 days of the ENAMA Servizi S.r.l. decision, making explicit reference to the fact that an appeal is presented in accordance with this paragraph of the regulation. ENAMA Servizi S.r.l., following the involvement of the President of the Committee for the Protection of Impartiality as a third party, will proceed with an assessment in this regard and will send a written response to the Client within 30 days of receipt regarding the outcome of the assessment and the related decisions.

If the dispute is not resolved amicably, the dispute itself may be referred to the decision of a Sole Arbitrator to be appointed in accordance with the rules of the Rome Chamber of Arbitration. The parties expressly declare that they know and accept the aforementioned Arbitration Rules.

The Sole Arbitrator decides ritually according to fairness, in compliance with the mandatory rules of the Code of Civil Procedure.

The costs will be borne by the losing party in the amount of 75%.

Annex 1 RG 01 ENAMA Servizi S.r.l.

Certification of a Multisite Organization

This annex applies for the certification of a company with a network of sites to ensure that the certification provides adequate confidence in the compliance of the company and all sites covered by the certification (hereinafter "Multi-Site Organization").

A multisite organization (Multisite) is defined as an organization that has a headquarters and multiple operational units and/or temporary sites that carry out activities similar to those carried out at the headquarters.

A **multisite organization** does not necessarily have to be a single legal entity, but all site activities related to the production or trade of pellets must be subject to a common management system which is constantly supervised by the central office **of the multisite organization**.

In order to consider the organization as operating in Multisite, all the requirements listed below must be met. If only one of them is missing, the case cannot be managed as Multisite:

The central office has the following responsibilities:

1. be contractually responsible to Enama Servizi to ensure the certification requirements are fully implemented and applied at all sites;
2. implement an internal control system on the compliance of the sites with the certification requirements;
3. is responsible for ensuring that all the requirements required by the certification and the corrective actions implemented to overcome any non-conformities found following the verification at a site are fully implemented in all locations of the multi-site company;
4. has access to all documentation relating to certification which is stored on the sites;
5. must demonstrate its ability to collect and analyze data from all sites, as well as demonstrate its authority across all sites to initiate changes if necessary;
6. must have a management system that ensures the management of complaints and the use of certification marks for all sites
7. appoints a quality manager responsible for the entire multi-site company. If the multi-site company operates in more than one country, at least one quality manager is appointed for each country.

The multi-site organization must be identified and certified separately for the activities falling within the terms "**producer**", "**trader**" and "**Service provider**". In the case of the producer, the multi-site company does not cover production sites located in another country

- The products and/or services provided by all sites must be of a similar type and must be provided (products) following the same methodologies and procedures;
- The Management System must report to the headquarters and must be subject to controls by the same. All sites are subject to an internal audit program;
- Management of all sites by the central organization must be demonstrated through the collection and analysis of all data from the sites.

1 Certification body requirements

1.1 General information

The CB must provide information to the multi-site organization on the eligibility criteria set out in this document before starting the assessment process and will not proceed with the assessment if any of the eligibility criteria for the multi-site organization are not met. Prior to the assessment process, the CB must inform the multi-site organization that the certificate will not be issued if non-compliance with these eligibility criteria is found during the assessment.

1.2 Non-compliance

1.2.1 When non-conformities are found in a single site, following an internal audit, an investigation into a complaint or an audit/test by Enama Servizi, the Central Office must carry out an investigation to determine whether the other sites can be influenced by it or present the same criticality. Therefore, Enama Servizi will require the multisite organization to review the nonconformities to determine whether or not they indicate an overall deficiency applicable to all sites. If this were the case, corrective action should be performed both at the central office and at individual sites. Otherwise, the multi-site organization must be able to demonstrate to Enama Servizi that the other sites do not present this criticality and it is not necessary to intervene.

1.2.2 Enama Servizi will ask for proof of these actions and in the case of site sampling it will increase the sampling frequency.

1.2.3 When making decisions, the nonconformance resolution requirements of this document shall be applied to the multisite organization.

1.2.4 Except in justified circumstances, it is not acceptable that, to overcome the obstacle posed by the existence of a non-conformity in a single site, the client organization tries to exclude the 'problematic' site from the scope during the certification process .

1.3 Certificates

1.3.1 At the end of the decision-making process, a single certificate will be issued with the name and address of the central office of the multi-site

Stamp and signature

Date _____
