Better Biomass interpretation document revised Directive EU/2018/2001

Date	2025-04-10
Supersedes	n.a.
Explanation	Amendments in view of complying with Revised Directive EU/2018/2001

This document provides interpretations of requirements related to the following documents of the Better Biomass certification system:

- NTA 8080-1:2024, Sustainability framework for biomass – Part 1: Terminology, overview and general requirements
- NTA 8080-2:2024, Sustainability framework for biomass – Part 2: Sustainability requirements
- NTA 8080-3:2024, Sustainability framework for biomass – Part 3: Requirements for greenhouse gas calculations
- NTA 8080-4:2024, Sustainability framework for biomass – Part 4: Chain of custody requirements
- NCS 8080-1:2024, Better Biomass – Part 1: Conformity assessment requirements related to sustainability framework for biomass
- NCS 8080-2:2024, Better Biomass – Part 2: Specific requirements for scheme management

Chapters of these documents have been listed where relevant for clarification of the changes or additions made in this Interpretation Document.

Changes in relation to the Revised Directive EU/2018/2001 (REDIII) are printed in red.

General corrections are printed in green

Changes related to Forestry are printed in orange

NTA 8080-1:2024, Sustainability framework for biomass – Part 1: Terminology, overview and general requirements

1 Scope

Any reference to Directive (EU) 2018/2001 or RED recast, in any part of NTA 8080:2024 and/or NCS 8080:2024, shall be read as revised Directive EU/2018/2001.

2 Normative references

3 Terms and definitions

3.63
primary forest, ~~and~~ other wooded land or old growth forest
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; and old growth forests as defined in the country where the forest is located.

[SOURCE: Revised Directive (EU) 2018/2001]

3.92
Heathland
land which has vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development.

NOTE: If in the applicable Member State or third county another official definition exists, that definition shall prevail.

[SOURCE: EU Copernicus, https://land.copernicus.eu/content/corine-land-cover-nomenclature-guidelines/html/index-clc-322.html]

3.94
old growth forests
A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.

NOTE: If in the applicable Member State or third county another official definition exists, that definition shall prevail.

[SOURCE: SWD(2023) 6, *Commission guidelines for defining, mapping, monitoring and strictly protecting EU primary and old-growth forests*]

6 Residues and waste

6.1 General

6.1.3 Collection points shall require [The NL translation shall be: '*moeten vereisen*'] all points of origin to sign a self-declaration. The amount of waste generated monthly or annually shall be clearly stated on the self-declaration. The collection point shall keep evidence or documents for all individual deliveries, including disposal agreements, delivery slips and self-declarations.

Annex C
(informative)

Cross-reference matrices with legal requirements

C.1 General

C.2 Cross-reference matrix with Revised Directive (EU) 2018/2001

Table C.1 shows the relevant requirements of Revised Directive (EU) 2018/2001 and the references to the corresponding requirements in the NTA 8080 series.

Table C.1 — Cross-reference matrix with Revised Directive (EU) 2018/2001

Article Directive	Topic	Reference in NTA 8080	Comment
29(3)	High-biodiversity value	Part 2, 7.1	
29(4)	High-carbon stock	Part 2, 6.1 a) – c)	
29(5)	Peatland	Part 2, 6.1 d)	
~~29(6)~~	~~Sustainable forestry~~	~~Part 2, 6.2~~	~~Only applicable for forest biomass~~
~~29(7)~~	~~Land use, land-use change and forestry~~	~~Part 2, 6.3~~	~~Only applicable for forest biomass~~
29(10)	Greenhouse gas emission savings	Part 2, 5.1.1 Part 3	Part 3 is based on Annex V and VI in the Directive
30(1)	Mass balance system	Part 4, 5.2.1	Part 4, Annex B provides more detailed requirements
30(2)	Sustainability characteristics	Part 4, 5.2.5	Linked to transaction document

NTA 8080-2:2024, Sustainability framework for biomass – Part 2: Sustainability requirements

1 Scope

2 Normative references

3 Terms and definitions

6 High-carbon stock

6.1 The organization shall not produce or use agricultural biomass from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year;

Where the conditions set out in Article 29(6), points (a)(vi) and (vii), are not met, this requirement also applies to biofuels, bioliquids and biomass fuels produced from forest biomass.

NOTE 1 To demonstrate whether the land meets this definition of wetlands, evidence that reflects the seasonal changes during a year is to be provided as part of the conformity assessment activities.

b) continuously forested areas, namely land spanning more than 1 hectare with trees higher than 5 m and a canopy cover of more than 30 %, or trees able to reach those thresholds in situ;

NOTE 2 It does not include land that is predominantly under agricultural or urban land use, in which land under agricultural use in this context 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.

c) land spanning more than 1 hectare with trees higher than 5 m 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 in accordance with NTA 8080-3 is applied, the greenhouse gas emissions saving requirement in 5.1.1 would be fulfilled;
d) peatland, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil.

Where the conditions set out in Article 29(6), points (a)(vi) and (vii), are not met, this requirement also applies to biofuels, bioliquids and biomass fuels produced from forest biomass.

NOTE 3 This does not include production from peatland that was partially drained in January 2008 and where subsequent deeper drainage affects soil that was not fully drained.

NOTE 4 EN 16214-3 can be used to determine whether a peatland area is excluded from agricultural biomass production.

6.2 Prior to installing a new production location, the organization shall establish which carbon stocks in the vegetation and in the soil are lost due to the production location being installed. If the organization has to use a for this purpose established and recognized procedure in order to establish the carbon stocks, such procedure shall comply with Commission Decision 2010/335/EU.

~~**6.3** With respect to forest biomass, the following types of biomass shall not be used, as far as not already excluded by other provisions:~~

~~a) stumps from sustainably managed forests, unless these should be removed for other reasons (e.g. road construction);~~
~~b) unprocessed wood from the trunk of a tree (round timber) from sustainably managed forests with a rotation period of more than 40 years, if on average more than 50 % of the timber harvest (excluding thinnings) is processed into biomass fuels.~~

~~**6.4** In the case of forestry, the organization shall maintain the production capacity of all forest types represented in the production location. The organization shall have written proof for all forest biomass that the production location from which the timber originates, is managed in order to maintain in the long-term or to increase carbon stocks by demonstrating that the carbon cycle is at least maintained.~~

~~NOTE This proof can be provided in the form of a (sustainable) forest management plan or similar evidence.~~

7 Biodiversity

7.1 The organization shall not produce or use agricultural biomass from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, regardless of its current status:

a) primary forest, ~~or~~ other wooded land or old growth forest, namely 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; and old growth forests as defined in the country where the forest is located.

   If in the applicable Member State or third county another official definition exists, that definition shall prevail.

   Where the conditions set out in Article 29(6), points (a)(vi) and (vii), are not met, this requirement also applies to biofuels, bioliquids and biomass fuels produced from forest biomass.

b) areas designated:

   i) by law or by the relevant competent authority for nature protection purposes;

   ii) for the protection of rare, threatened or endangered ecosystems or species recognized by international agreements or included in lists drawn up by intergovernmental organizations or the International Union for the Conservation of Nature, subject to their recognition in accordance with the procedure laid down in article 30(4) of Revised Directive (EU) 2018/2001;

   iii) as areas with high conservation value;

   NOTE 1 High conservation value area is defined in NTA 8080-1:2024, 3.40.

c) unless evidence is provided that the production of the raw material does not interfere with those nature protection purposes;

d) highly biodiverse grassland that is either natural or non-natural (see NTA 8080-1:2024 3.55 and 3.58 respectively), in which the following geographic ranges of the European Union are always regarded as highly biodiverse grassland:

— habitats as listed in Annex I to Directive 92/43/EEC;

— habitats of significant importance for animal and plant species of European Union interest listed in Annexes II and IV to Directive 92/43/EEC;

— habitats of significant importance for wild bird species listed in Annex I to Directive 2009/147/EC.

Other grassland can fulfil the criteria for highly biodiverse grassland set out in d).

Any land that is, or was, non-natural, highly biodiverse grassland in or after January 2008 may be used for fuels production on the condition that the harvesting of the raw material is necessary to preserve the status of the grassland as highly biodiverse grassland and that current management practices do not present a risk of causing biodiversity decline of the grassland. The organization shall provide evidence to support this claim. If the organization is unable to provide this evidence, the organization shall provide evidence that it has been granted permission by the relevant competent authority, or designated agency, to harvest the raw material in order to preserve the highly biodiverse grassland status.

NOTE 2 A.2.4 and E.3.2.1.2 of NCS 8080-1:2024 specify requirements in relation to verification of conformity to the requirements related to highly biodiverse grasslands as specified in this section.

Where the conditions set out in Article 29(6), points (a)(vi) and (vii), are not met, this requirement also applies to biofuels, bioliquids and biomass fuels produced from forest biomass.

e) highly biodiverse forest and other wooded land, which is species-rich and not degraded, or has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.

NOTE 3 Highly biodiverse forest and other wooded land is defined in NTA 8080-1:2024, 3.41.

NOTE 4 EN 16214-3 can be used to determine whether certain categories of land with high biodiversity value are excluded from agricultural biomass production.

Where the conditions set out in Article 29(6), points (a)(vi) and (vii), are not met, this requirement also applies to biofuels, bioliquids and biomass fuels produced from forest biomass.

f) Heathland

Heathland is defined as land which has vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development.

If in the applicable Member State or third county another official definition exists, that definition shall prevail.

Where the conditions set out in Article 29(6), points (a)(vi) and (vii), are not met, this requirement also applies to biofuels, bioliquids and biomass fuels produced from forest biomass.

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8 The environment

8.1 Soil

[In NL version: soil has been translated as ‘grond’, but shall be translated as ‘bodem’.]

NTA 8080-3:2024, Sustainability framework for biomass – Part 3: Requirements for greenhouse gas calculations

1 Scope

2 Normative references

3 Terms and definitions

4 Principles

4.2 When biomass is used for energy (e.g. biofuel, biogas, bioliquid and biomass fuel), the net greenhouse gas emissions saving relative to the fossil-based reference system is required to meet a minimum percentage in order to be qualified as energy from renewable sources, provided that also other sustainability requirements are met.

The minimum net greenhouse gas emissions saving relative to fossil reference system for application in transport, electricity, heating or cooling, as specified in NTA 8080-2:2024, 5.1.1 are:

— at least 50 % for biofuels, biogas consumed in the transport sector, and bioliquids produced in installations in operation on or before 5 October 2015

— at least 60 % for biofuels, biogas consumed in the transport sector, and bioliquids produced in installations starting operation from 6 October 2015 until 31 December 2020

— at least 65 % for biofuels, biogas consumed in the transport sector, and bioliquids produced in installations starting operation from 1 January 2021

~~— at least 70 % for electricity, heating and cooling production from biomass fuels used in installations starting operation from 1 January 2021 until 31 December 2025, and 80% for installations starting operation from 1 January 2026~~

— for electricity, heating and cooling production from biomass fuels used in installations that started operating after 20 November 2023, at least 80%;

— for electricity, heating and cooling production from biomass fuels used in installations with a total rated thermal input equal to or exceeding 10 MW that started operating between 1 January 2021 and 20 November 2023, at least 70% until 31 December 2029, and at least 80% from 1 January 2030;

— for electricity, heating and cooling production from gaseous biomass fuels used in installations with a total rated thermal input equal to or lower than 10 MW that started operating between 1 January 2021 and 20 November 2023, at least 70% before they have been operating for 15 years, and at least 80 % after they have been in operation for 15 years;

— for electricity, heating and cooling production from biomass fuels used in installations with a total rated thermal input equal to or exceeding 10 MW that started operating before 1 January 2021, at least 80% after they have been operating for 15 years, at the earliest from 1 January 2026 and at the latest from 31 December 2029;

— for electricity, heating and cooling production from gaseous biomass fuels used in installations with a total rated thermal input equal to or lower than 10 MW that started operating before 1 January 2021, at least 80% after they have been operating for 15 years and at the earliest from 1 January 2026.

…

5 Greenhouse gas calculations for biofuels and bioliquids

…

5.16 Concerning *e*ccr, emission savings from CO2 capture and replacement shall be related directly to the production of biofuel or bioliquid they are attributed to, and shall be limited to emissions avoided through the capture of CO2 of which the carbon originates from biomass and which is used to replace fossil-derived CO2 in production of commercial products and services before 1 January 2036.

…

5.19 For the purposes of the Formula (1), the emissions to be divided shall be *e*ec + *e*l + *e*sca plus those fractions of *e*p, *e*td, *e*ccs, and *e*ccr that take place up to and including the process step at which a co-product is produced. If any allocation to co-products has taken place at an earlier process step in the lifecycle, the fraction of those emissions assigned in the last such process step to the intermediate fuel product shall be used for those purposes instead of the total of those emissions.

In the case of biofuels and bioliquids, all co-products shall be taken into account for the purposes of that calculation. No emissions shall be allocated to wastes and residues. Co-products that have a negative energy content shall be considered to have an energy content of zero for the purposes of the calculation.

~~Wastes and residues, including tree tops and branches, straw, husks, cobs and nut shells, and residues from processing, including crude glycerine (glycerine that is not refined) and bagasse,~~ As a general rule, wastes and residues including all wastes and residues included in Table 3 of NTA 8080-1 (which is based on Annex IX of Revised Directive (EU) 2018/2001 and Annex IV of IR (EU) 2022/996), shall be considered to have zero lifecycle greenhouse gas emissions up to the process of collection of those materials irrespectively of whether they are processed to interim products before being transformed into the final product.

In the case of fuels produced in refineries, other than the combination of processing plants with boilers or cogeneration units providing heat and/or electricity to the processing plant, the unit of analysis for the purposes of the aforementioned calculation shall be the refinery.

6 Greenhouse gas calculations for biomass fuels

…

6.15 Concerning e_{td}, emissions from transport and distribution shall include emissions from the transport of raw materials and semi-finished materials and from the storage and distribution of finished materials (including emissions from depots and filling stations). Emissions from transport and distribution to be taken into account for in e_{ec} shall not be included in e_{td}.

NOTE 1 The emissions of depots and filling stations may be calculated using the data provided by the JRC. The provided values (depot: 0,000 84 MJ/MJ fuel, filling station: 0,003 4 MJ/MJ fuel) must be multiplied by the appropriate national electricity emission factors from the Implementing Regulation 2)

NOTE 2 For gas grid losses, the version 5 of the JEC Well-to-Tank report[3)] specifies an emission factor of 0,01 g CH4/MJ NG supplied.

6.18 Concerning *e*ccr, emission savings from CO2 capture and replacement shall be related directly to the production of biomass fuel they are attributed to, and shall be limited to emissions avoided through the capture of CO2 of which the carbon originates from biomass and which is used to replace fossil-derived CO2 in production of commercial products and services before 1 January 2036.

…

6.21 For the purposes of the aforementioned calculation, the emissions to be divided shall be eec + el + esca plus those fractions of ep, etd, eccs, and eccr that take place up to and including the process step at which a co-product is produced. If any allocation to co-products has taken place at an earlier process step in the lifecycle, the fraction of those emissions assigned in the last such process step to the intermediate fuel product shall be used for those purposes instead of the total of those emissions.

In the case of biogas and biomethane, all co-products that are not covered in the calculation of el shall be taken into account for the purposes of that calculation. No emissions shall be allocated to wastes and residues. Co-products that have a negative energy content shall be considered to have an energy content of zero for the purposes of the calculation.

~~Wastes and residues, including tree tops and branches, straw, husks, cobs and nut shells, and residues from processing, including crude glycerine (glycerine that is not refined) and bagasse,~~ As a general rule, wastes and residues including all wastes and residues included in Table 3 of NTA 8080-1 (which is based on Annex IX of Revised Directive (EU) 2018/2001 and Annex IV of IR (EU) 2022/996) shall be considered to have zero lifecycle greenhouse gas emissions up to the process of collection of those materials irrespectively of whether they are processed to interim products before being transformed into the final product.

In the case of biomass fuels produced in refineries, other than the combination of processing plants with boilers or cogeneration units providing heat and/or electricity to the processing plant, the unit of analysis for the purposes of the aforementioned calculation shall be the refinery.

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[3] European Commission: Joint Research Centre, Prussi, M., Yugo, M., De Prada, L., Padella, M. et al., JEC well-to-tank report V5 – JEC well-to-wheels analysis – Well-to-wheels analysis of future automotive fuels and powertrains in the European context, Publications Office, 2020, https://data.europa.eu/doi/10.2760/100379

Annex A
(normative)

Requirements for determining emissions from extraction or cultivation of raw materials

A.1 General

A.2 Emissions from the extraction or cultivation process itself

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A.2.5 Emissions from fertilizer acidification and liming application

A.2.5.1 The emissions from the neutralisation of fertilizer acidification and application of aglime shall account for the CO2 emissions from the neutralization of acidity from nitrogen fertilizers or from aglime reactions in the soil.

A.2.5.2 The emissions resulting from acidification caused by nitrogen fertilizer use in the field shall be accounted for in the emission calculation, based on the amount of nitrogen fertilizers used. The emissions from the neutralization of nitrogen fertilizers in the soil shall be **0,806** kg CO2 per kg N for nitrate fertilizers and **0,783** kg CO2 per kg N for urea fertilizers.

NTA 8080-4:2024, Sustainability framework for biomass – Part 4: Chain of custody requirements

1 Scope

2 Normative references

3 Terms and definitions

…

5 Requirements for organizations active in chain of custody

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5.5 Documented information

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5.5.2 Within the framework of Revised Directive (EU) 2018/2001, the organization shall enter in a timely manner all relevant information in the Union database on the transactions made and the sustainability characteristics of the fuels subject to those transactions, including their life-cycle greenhouse gas emissions, starting from their point of production to the moment they are placed on the market in the Union. The entries in the Union Database shall correspond with the figures that are part of the organization's bookkeeping and net mass balance data or other encoded information on their entities or sites. There shall be no deviations between data that has been registered in the Union Database and the respective data from the organization's documentation.

NOTE: The UDB is live and the European Commission plans to agree on a date with the EU Member states beyond which date the use will be mandatory. More information will be available on the Union Database for Biofuels Public wiki, at:
https://wikis.ec.europa.eu/display/UDBBIS/Union+Database+for+Biofuels+-+Public+wiki

For the purpose of entering data into the Union database, the interconnected gas system shall be considered to be a single mass balance system. Data on the injection and withdrawal of renewable gaseous fuels shall be provided in the Union database. Data on whether support has been provided for the production of a specific consignment of fuel, and if so, on the type of support scheme, shall also be entered into the Union database.

Economic operators shall, in the event that the Member State decides to complement a mass balance system by a system of guarantees of origin, enter into the Union database data on the transactions made and on the sustainability characteristics and other relevant data, such as greenhouse gas emissions of the fuels up to the injection point to the interconnected gas infrastructure.

NCS 8080-1:2024, Better Biomass – Part 1: Conformity assessment requirements related to sustainability framework for biomass

1 Scope

2 Normative references

3 Terms and definitions

4 General requirements

…

4.2 Management of impartiality

4.2.1 The governance system of the certification body shall aim at ensuring the highest possible level of independence of the auditors' judgement**.** The certification body shall apply the principles of auditors' rotation, put in place integrity rules and procedures as specified in EN ISO/IEC 17065 and other relevant standards and good practices, to ensure that auditors are independent from the organizations that participate in the 'Better Biomass' scheme. These include, but are not limited to the requirements specified in the subclauses below, which are adopted from EN ISO/IEC 17065:2012, 4.2. An exception is possible for the audit of Article 29(3), points (a), (b), (d) and (e), Article 29(4), point (a), Article 29(5), point (a) of Article 29(6) and point (a) of Article 29(7), in which case first or second party auditing may be used up to the first gathering point.

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7 Process requirements

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7.4 Evaluation

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7.4.4 In the case of more production locations, all production locations shall be evaluated onsite. Sampling is only permitted if storage and transshipment takes place at multiple locations under one certificate.

7.5 Review

7.5.3 In the cases of an initial certification audit or recertification audit, the organization may not have any critical or major nonconformities in accordance with Annex G. In case of a surveillance audit, the organization may have minor and major nonconformities, but no critical nonconformities.

7.5.4 The following certification criteria shall be applied:

a) If the organization has a critical nonconformity during the initial certification audit, the certificate shall not be issued. The organization may reapply for certification after 12 months of this certification decision. If the organization has a critical nonconformity during the surveillance or recertification audit, or through the internal monitoring system by the scheme manager including complaints process, the certificate shall be withdrawn immediately. From that moment, the organization is not allowed to supply (processed) biomass under certificate in its supply chain and any form of manifestation in relation to the certificate is excluded.

b) If the organization has a major nonconformity during the initial certification audit, the certificate shall not be issued. The organization may directly reapply for certification after this certification decision.

c) If the organization has a major nonconformity during the surveillance or recertification audit, or through the internal monitoring system by the scheme manager including complaints process, the certificate shall be suspended in case the major nonconformity meets the following criteria from Commission Implementing Regulation (EU) 2022/996:

   Failure to comply with a mandatory requirement of Revised Directive (EU) 2018/2001, where the non-conformity is potentially reversible, repeated and reveals systematic problems, or aspects that alone, or in combination with further non- conformities, may result in a fundamental system failure, shall be considered to be a major non-conformity. Major non-conformities shall include, but are not limited to, the following:

   1) systematic problems with mass balance or GHG data reported for example, incorrect documentation is identified in more than 10 % of the claims included in the representative sample;

   2) the omission of an economic operator to declare its participation in other voluntary schemes during the certification process;

   3) failure to provide relevant information to auditors for example, mass balance data and audit reports.

   From that moment, the organization is not allowed to supply (processed) biomass under certificate in its supply chain and any form of manifestation in relation to the certificate is excluded.

d) If the organization has a general major nonconformity during the surveillance or recertification audit, or through the internal monitoring system by the scheme manager including complaints process, the certificate shall not be immediately suspended. General major nonconformities do not constitute a failure to comply with a mandatory requirement of Directive (EU) 2018/2001, but a specific requirement that exceeds legal requirements and that implies an immediate high risk, or means a lack of proof of the correction of a minor non-conformity that was already observed at the previous audit.

   For both types of major nonconformity, the certification body shall request the organization to provide a proposal for improvement within two weeks after receipt of the audit report. The organization has at maximum 90 days after receipt of the audit report to correct the observed nonconformity and to demonstrate this to the certification body. If the organization does not correct a major nonconformity within this fixed term, the certificate shall be withdrawn.

e) If the organization has a minor nonconformity, the certification body shall request the organization to provide an action plan about the implementation of corrective measures for review by the certification body within two weeks after receipt of the audit report.

   The certification body shall verify these corrective measures at the next regular audit, not exceeding 12 months after receipt of the audit report. If the organization does not correct a minor nonconformity within this fixed term, this nonconformity shall be classified as a major nonconformity.

~~7.5.5 In case of sampling as specified in Annex C, it applies that if one or more production locations does or do not conform to the certification criteria in 7.5.4, the 'producer' neither conforms to the certification criteria.~~

Annex E
(normative)

Methods to assess conformity to applicable requirements

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E.5 Assessment of chain of custody requirements

E.5.2 Specific requirements and guidance

E.5.2.9 Within the framework of Revised Directive (EU) 2018/2001 Auditors shall verify that the entries in the Union Database of the organization correspond with the figures that are part of the organization's bookkeeping and net mass balance data or other encoded information on their entities or sites. Any deviations between data that has been registered in the Union Database and the respective data from the economic operator's documentation shall be immediately flagged in the audit report and to the voluntary scheme. Such discrepancies can lead to major nonconformities identified in the audit report and trigger a suspension of the certificate of the economic operator (see **G**.3).

Annex G
(normative)

Critical and major nonconformities

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G.3 Major nonconformities and General major nonconformities

Table G.2 shows the nonconformities that shall be classified as major as specified in Commission Implementing Regulation (EU) 2022/996 and for which the certificate shall be immediately suspended.

Table G.2 — Major nonconformities

Description major nonconformity	**Related section in reference document**
The organization has not the required information and documentation available at all	NTA 8080-1:2024, 5.3 and 5.5
The identification of incorrect documentation in more than 10 % of the claims included in the representative sample with significant impact	NTA 8080-1:2024, 5.2
The organization fails to provide relevant information to auditors for example, mass balance data and audit reports	NTA 8080-1:2024, 5.2
The organization omits declaring its participation in other voluntary schemes during the certification process	NCS 8080-1:2024, 7.2.1
The organization cannot submit a validated calculation for its contribution to the greenhouse gas emission saving along the supply chain of the biobased raw material, as far as no default values have been used	NTA 8080-1: 2024, 5.1, NTA 8080-3:2024, Clause 5, 6, 7

Description major nonconformity	Related section in reference document
The organization has used biomass that were not allowed to be used in view of carbon debt	NTA 8080-2:2024, 6.6
The organization applies a chain of custody model that is not allowed in view of the intended application	NTA 8080-4:2024, 4.1
The organization doesn't issue transaction certificates or issues incorrect transaction certificates with significant impact	NTA 8080-4:2024, Clause 6
The organization has an inadequate bookkeeping to demonstrate that the mass balance is well balanced within the balance period in accordance with NTA 8080-4:2024, 5.3 with significant impact	NTA 8080-4:2024, 5.5.4
The data that has been registered in the Union Database deviates from the respective data from the economic operator's documentation with significant impact	NTA 8080-4:2024, 5.5.2

Table G.3 shows the nonconformities that shall be classified as general major nonconformities as they do not constitute a failure to comply with a mandatory requirement of Directive (EU) 2018/2001, and for which the certificate shall not be immediately suspended.

Table G.3 — General major nonconformities

Description major nonconformity	Related section in reference document
The organization has not retained its documents for at least five years or longer as mandatory to prevailed laws and regulations	NTA 8080-1:2024, 5.4
The identification of incorrect documentation in more than 10 % of the claims included in the representative sample with limited impact*	NTA 8080-1:2024, 5.2
The organization has not organized the PDCA-cycle ('plan-do-check-act' cycle) in such way that it is able to implement essential improvements in its operational management	NTA 8080-1:2024, 5.7
The organization cannot demonstrate to be familiar with the laws and regulations that apply to its operational management	NTA 8080-1:2024, 5.6
~~The organization markets its agricultural biomass as 'ILUC low risk' without demonstrating that one or more of the possible solutions to reduce ILUC has been applied~~	~~NTA 8080-2:2024, 9.3~~
The organization doesn't issue transaction certificates or issues incorrect transaction certificates with limited impact*	NTA 8080-4:2024, Clause 6
The organization has an inadequate bookkeeping to demonstrate that the mass balance is well balanced within the balance period in accordance with NTA 8080-4:2024, 5.3 with limited impact*	NTA 8080-4:2024, 5.5.4
The organization has not designed its production location(s) in accordance with the requirements of the applied chain of custody model	NTA 8080-4:2024, 5.6
The organization doesn't conform to the requirements for the use of logo	NTA8080-1:2024, Annex B

* Limited impact constitutes of an isolated or temporary lapse, is not systematic and does not result in a fundamental failure if not corrected.

Auditors shall treat as a general major non-compliance any identified deviation in the testing method or inaccuracy in incorporating the results of such tests into the final calculation by the organization.

NCS 8080-2:2024, Better Biomass – Part 2: Specific requirements for scheme management

1 Scope

2 Normative references

3 Terms and definitions