



**KZR INiG Annual Report  
2025**

**Approved by**

**Krakow, 30<sup>th</sup> April 2026**

## Summary

KZR INiG is a voluntary scheme recognized by the European Commission since 3rd of June 2014. In December 2022 the scheme gained again the subsequent recognition (EU 2022/2461). The Decision recognizes the scheme for demonstrating compliance with the requirements set out in Directive (EU) 2018/2001 of the European Parliament and of the Council as regards biofuels, bioliquids, biomass fuels, renewable liquid and gaseous fuels of non-biological origin and recycled carbon fuels and repealing Commission Implementing Decision (EU) 2022/603. KZR INiG has successfully implemented requirements of 2023/2413 Directive. The certification covers:

- Type of feedstock(s): Agricultural and forest biomass, wastes and residues.
- Type of fuel(s): All
- Geographic coverage: Global
- Chain of custody coverage: Full fuel chain (for biomethane up to the production unit).

No esca certification was performed.

KZR INiG pays attention to the independence appropriate standard of audits, transparency and appropriate supervision over the scheme. The Council is the body responsible for supervising over independency and transparency. In 2025 the Council met three times. The KZR INiG website (<http://www.kzr.inig.eu/en/>) is a communication platform, information is distributed also by newsletter function. On the website all vital information is published, such as issued certificates, suspended certificates, active and non-active certification bodies (CBs), contact details etc. Moreover, KZR INiG organizes training sessions for scheme participants and auditors.

As of 31 of December 2025 there were 1871 issued certificates (including updates) and 9 active certification bodies (CBs). In 2025 no certification body has joined the scheme. In 2025 the following numbers of audit were performed: 4 on-site audits at CBs headquarters; 9 witness audits; 16 integrity audits; 23 desk audits. In 2025 there was 3 cases of certificates withdrawal. Certification bodies detected 795 of minor and 32 of major non-conformities during regular audits. There were 4 rejections of an application of an economic operator as a result of KZR INiG due diligence process. In 2025 two complaints were investigated.

Performing the risk analysis before an audit is mandatory. In case of FGP scope there is an obligation to perform two separate risk analyses: for places of origin (called FGP risk analysis) and for FGP as for company (company risk analysis). In case of 1,66 % of FGP risk analysis the medium risk was assessed, and 0,81,31 % of FGPs high risk was detected. For the total pool of economic operators 2,13 % of certified company were assessed as medium risk companies and 0,73 % as high risk companies.

According to internal monitoring, KZR INiG carried out 52 audits of the CBs (total: on-site, witness, internal monitoring, accreditation audits, desk audits). KZR INiG certification bodies have a possibility to be accredited according to requirements of Regulation (EU) 2022/996, art. 11. At the end of 2024, 7 CBs had been accredited according to KZR INiG program launched by the national accreditation body (PCA). **In this context KZR INiG is prepared to meet accreditation obligation.**

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**(a) rules on the independence, method and frequency of audits as approved by the Commission upon accreditation of the voluntary scheme and any changes to them over time to reflect Commission guidance, the modified regulatory framework, findings from internal monitoring on the auditing process of certification bodies and evolving industry best practice;**

Requirements concerning the independency, modality and frequency of audits of KZR INiG participants are described in scheme documents: System KZR INiG/9 and System KZR INiG/10. The documents were updated in 2025 in order to adjust KZR INiG to the 2023/2413 Directive (RED III). Thus, since the May of 2025 version no 4 of KZR INiG documents came into force. Internal monitoring composes two parts: supervision of certification bodies and economic operators.

### **Certification bodies**

Supervision covers verification of CBs as on site audits and verification of CBs as witness audits or integrity audits. If CB is accredited by national accreditation body KZR INiG may waive the on-site audit.

KZR INiG schedules the witness audits and integrity audits according to the following steps:

1. Defining the pool of participants. The pool is the number of active participants as of 31st of December, of the previous year.
2. Determining the number of audits to be carried out. The number of audits is defined as **1,5%** of active participants but no less than the number of active CBs as of 31st of December of the previous year.
3. For each certification body, at least 1 audit is carried out as part of internal monitoring during the year.
4. Remaining audits are carried out as internal monitoring performed by the KZR INiG auditors. The selection of participants is carried out based on:

- risk analysis that considers the results of KZR INiG audits,
- the number of certificates issued by active certification bodies,
- complaints or reports,
- random sample,
- the size of the economic operator.

In addition to audits performed as on-site audits, verification of sample of audits documents as a desk audit is performed. In 2025, 23 verifications were performed. The audit identified minor non-conformities resulting from incorrectly completed documents or missing required information in the certification documents.

In 2025 the following number of on-site audits were performed:

- 4 on-site audits at CBs headquarters;
- 9 witness audits;

- 16 integrity audits;

With regard to the assessment of certification bodies, six audits were identified where there was a high risk of non-KZR biomass being classified as KZR. This involved three different certification bodies. As a consequence, for these CBs a follow up audits were scheduled (one was conducted in 2025, and two audits will be conducted in 2026). In summary, a total of 55 non-conformities were identified in 14 audits; in 14 audits the certification body did not receive any non-conformities. 1 integrity audit was not conducted due to denial of access. The economic operator was excluded from the scheme. Audits conducted at the sites of certification bodies by the KZR INiG System serve to oversee the proper conduct of the certification process. They include an assessment of the compliance of procedures, the competence of auditors, and certification documentation and decisions. The criteria for these audits are described in the KZR INiG System documentation. Audits may be scheduled (for certification bodies without national accreditation) or unscheduled, resulting from the detection of violations or non-compliance (e.g., identified through ongoing internal monitoring). In 2025 one authorisation of certification body has been suspended and subsequently withdrawn. The withdrawal resulted from the fact that CB did not close non-conformities identified during the audit performed by KZR INiG in October 2024.

### **Economic operators**

Internal monitoring verifies not only certification bodies but also economic operators. As a result of internal monitoring, in 3 cases the certificate was suspended, and in 1 case the certificate was withdrawn. In 8 cases minor non-conformities were detected and in 6 case no non-conformities were detected.

The basic frequency of auditing performed by CB is one audit per year (excluding traders dealing both fresh wastes materials. In this case an additional audit is mandatory). An EO loses participant status if it does not comply with this rule. In order to regain its status, it must re-register and must be a subject of due diligence verification. Audit covers the whole period during which the certificate was held (despite the lack of the certification, even if the break lasted e.g. for one year or longer). It is emphasized (especially during trainings and auditing) that switching of certification body/certification scheme or a break in certification does not cause that the certification process starts again.

Before accepting the EO KZR INiG performs due diligence. As a part of due diligence verification of EO's status according to other VS is performed. If the EO has unsolved issues with other scheme, the EO is not permitted to join KZR INiG. Due diligence covers not only verification of the legal entity but also legal predecessor and the management. The verification covers the management board of the company applying to KZR includes persons who were on another management board of the company in respect of which inconsistencies were found. If findings from due diligence process indicate high risk company, then KZR INiG rejects the application. In 2025 there was 4 cases of registration refusal resulting from findings from due diligence process. In 2025, based on the "Declaration of Consent" document, the KZR INiG system received inquiries from other voluntary schemes regarding entrepreneurs who are currently or have been participants in the KZR INiG system. KZR INiG also sent such queries to other schemes.

If the EOs place of activity is different than registration address, the audit should be carried out at actual activity place. The actual place of audit shall be reported in the audit documentation. Audits of farmers are performed or as on-site audits or as desk audits. Desk audits are allowed if there are:

- high quality satellite images of the cultivation area, and databases regarding, for example, protected areas, areas with high biodiversity, peatland, etc. (both current and as of 1st January 2008);
- reliable documents confirming land status (both current and as of 1st January 2008). Documents issued by governmental institutions (e.g. land register) or documents, including satellite images, confirming participation in the EU support system (cross-compliance) that could be considered as reliable.

A risk level of a desk audit stays at the same level as a risk of on-site audit. A desk audit can be applied only in order to verify land (2008) status.

Performing the risk analysis before an audit is mandatory. In case of FGP scope there is an obligation to perform two separate risk analyses: for places of origin (called FGP risk analysis) and for FGP as for company (company risk analysis). In case of 1,66 % of FGP risk analysis the medium risk was assessed, and 1,31 % of FGPs high risk was detected. For the total pool of economic operators 2,13 % of certified company were assessed as medium risk companies and 0,73 % as high risk companies.

#### **(b) rules and procedures for identifying and dealing with non-compliance by economic operators and members of the scheme;**

The detailed procedures concerning proceeding with complaints and internal monitoring procedures are described in the document “System KZR INiG/1” point 8 “Transparency and independence of the KZR INiG System, complaint procedures, internal monitoring”. Since July 2021 new procedure concerning proceeding with complaints was introduced. In 2025 two complaints were investigated.

The first complaint has been lodged by certification body and related to the decision on withdrawal the authorisation. The issue in question was that the decision on withdrawal of the authorisation has been taken in last day of the agreement’s validity. The Committee has scrutinized the issue and has concluded that the certification body has not addressed the non-conformities and the decision on withdrawal remains in effect.

The second complaint has been lodged by the independent association and related to KZR INiG participant and certification body that issued the certificate. The complaint raised allegations against the certified company concerning negative impact on the environment and mass balance and also against the certification body concerning improperly conducted audit. The allegations were not upheld by the investigation.

The cases were also the subject of annual KZR INiG training for CBs.

Rules for dealing with non-conformities are described in the document “System KZR INiG/10”. Since July 2021 KZR INiG has introduced three categories of non-conformities and new rules of dealing with them.

In 2025 there were 2 cases of certificates withdrawals. Certification bodies detected 781 of minor and 43 of major non-conformities during regular audits. Two critical non-conformities were detected.

- abusing of mass balance rules: 117 cases (16 major non-conformities, 101 minor non-conformities),
- abusing of GHG emission rules: 71 cases (5 major non-conformities, 66 minor non-conformities),
- abusing of land use criteria: 2 cases (2 minor non-conformities),
- mistakes or deficiencies in the documentation: 638 cases (22 major non-conformities, 616 minor non-conformities).

In 2025 no certification body has joined the scheme.

### **(c) evidence of fulfilling the legal requirements on transparency and publication of information in line with Article 6 of Commission Implementing Regulation (EU) 2022/996;**

All information connected with the KZR INiG scheme is published on the scheme’s website ([www.kzr.inig.eu](http://www.kzr.inig.eu)). The website contains essential information such as:

- governance structure <https://kzr.inig.eu/en/about-us/>;
- scheme documents (recognized by the European Commission). Documents are both in English and Polish. <https://kzr.inig.eu/en/documents/>;
- contacts details <https://kzr.inig.eu/en/contact/>;
- a list of approved and inactive certification bodies. The list is constantly updated. Currently (April 2026) there are 9 approved certification bodies;
- a list of issued certificates with an option to download certificates (the list of economic operators participating in the scheme) <https://kzr.inig.eu/en/certification/issued-certificates/>. The list is constantly updated and includes: the certificate number; participant name, participant certificate issue and expiry date, address, certified locations, scope of certification and the name of the certification body which issued the certificate, and comments. The column “comments” contains mainly following information:
  - Information on updating certificates,
  - Dates of certificates suspension,
  - Dates of certificates withdrawal,

- Dates of certificates publication.

On the website certificate together with summary report is published.

#### Information about updating certificates

If any data published on a certificate needs to be updated (e.g. scope, locations, company address etc.), the certificate is updated, valid certificate is published and appropriate notes are placed in “comments” column.

#### Dates of certificates suspension

In cases of abusing agreement provisions both in relation to the scheme and certification body, (including major non-conformities and e.g. delay in payment or sending quantity report), the publication of the certificate is temporary suspended until all arrears are settled. Information about suspension period stays available at all times and noted in the “comments”. There were 121 such cases, in particular:

- 35 % of suspended certificates were suspended for a 1-2 days;
- 15 % of suspended certificates were suspended for a 3-7 days;
- 14 % of suspended certificates were suspended for a 8-14 days;
- 12 % of suspended certificates were suspended for a 15-30 days;
- 34 % of suspended certificates were suspended for a longer than 30 days.

#### Dates of certificates withdrawal

Appropriate information is noted in the “remarks” column. There were 3 cases in 2025.

#### Dates of certificate publication

In some cases, a CB withholds sending information to KZR INiG about issuing a certificate usually due to lack of payments until payments is settled. Thus, KZR INiG receives the certificate with delay and publishes both certificate validity date and publication date (noted as a “remark”). There were 36 such cases noted. According to KZR INiG only if the certificate is disclosed on the website and is marked as valid the company is allowed to handle sustainable biomass.

No fake certificates were detected during 2025.

News is published on the scheme website and distributed via a newsletter. The newsletter function is freely available for everyone. What is more, the EO has each information and documents archived in the account of KZR INiG IT platform. Thus, each information is easy to trace.

A training plan is published on the KZR INiG website, a reminder about upcoming training is also disseminated via newsletter.

The Report resulting from the KZR INiG activities is presented during the KZR INiG Council meetings.

**(d) stakeholder involvement, particularly as regards the consultation with indigenous and local communities prior to the decision making during the drafting and reviewing of the scheme, as well as during audits, and the response to their contributions;**

The structure of the KZR INiG scheme includes the KZR INiG Council (see document KZR INiG System/1). The KZR INiG Council, called "the Council" in all System documents, comprises 5 to 10 members (external experts, e.g. industry representatives, associations, NGOs, representatives of government, representatives of certification bodies). It ensures that every group of stakeholders has its representatives in the Council. Members are selected such that each party has its own representatives, and no party predominates.

In 2025, three Council meetings were held. Besides regular reporting of current activity and problems, following crucial problems were discussed:

- RED III implementation;
- Supervision over certification bodies and withdrawal of the certification body authorisation;
- Probable counterfeiting of sunflower husk pellets;
- UDB;
- Accreditation according to art. 11 of 2022/996 Regulation.

**(e) overview of the activities carried out by the voluntary scheme in cooperation with the certification bodies in order to improve the overall certification process and the qualification and independence of auditors and relevant scheme bodies;**

Management of the scheme is performed according to the rules described in System KZR INiG/1 document. Biomass Certification Systems Office is responsible for supervising the KZR INiG scheme. In order to ensure robustness of the scheme many solutions have been implemented concerning both internal management of the scheme and supervision over CBs and EOs.

Biomass Certification Systems Office is a subject of internal audit. In 2025 one internal audit was carried out.

Verification of compliance with the KZR INiG requirements is carried out by the System's Administrator before and after authorization of a certification body.

The KZR INiG scheme set requirements for auditors (KZR INiG System/9 and KZR INiG System/10). Fourth issue (RED III) of KZR INiG documents (dated on 05.05.2025)

In order to improve the overall certification process KZR INiG has defined competency requirements for a reviewer. According to KZR INiG all audit documents are verified by people who have appropriate knowledge and experience in KZR INiG requirements field.

Ensuring independency by CBs is a subject of audits carried out by KZR INiG in the CBs (in accordance with internal monitoring procedure). Each CB appointed an external body usually called „impartiality committee“. The committee meets ones a year. The minutes of these meetings are subject of the KZR INiG verification during on-site audits.

The KZR INiG System pays particular attention to the maintenance of auditor and other staff competences. KZR INiG organizes trainings for auditors and for scheme participants. Each auditor before being appointed shall pass the basic training called “KZR INiG System principles” with positive result of the exam. In 2025 there were four sessions of these basic trainings covering scheme’s requirements. As the new version of KZR INiG documents came into force four sessions of supplementary trainings were organized. Trainings are available in English and Polish.

Additionally, each year KZR INiG organises a training called. “Enhancing KZR INiG audit process”. The training is mandatory for the KZR INiG certification bodies. Scope of this training is always adjusted to current issues. The common mistakes made by an auditor/certification body are always discussed. In 2025 the training took place of December 3-4. The training focused on identification of potential frauds, main audits mistakes, good audit practices, defining and verification of place of origin especially in waste/residue supply chain, identification of non-conformities, RED III requirements in the context of forest biomass, GHG emission calculation. The training consists of two parts: lectures and workshops.

Besides of basic training, KZR INiG provides GHG emission workshops (seven sessions in 2025).

KZR INiG auditors participated in 22 of man-days of trainings.

**(f) market updates of the scheme, the amount of feedstock, biofuels, bioliquids, biomass fuels, recycled carbon fuels and renewable fuels of non-biological origin all certified, by country of origin and type, and the number of participants;**

In 2025, there were 1871 of issued certificates (including updates). Certificates are issued bilingually: English and in language of country of origin of the certified company. Certified companies originate from Poland, Czech Republic, Ukraine, Lithuania, Germany, Hungary, Slovakia, Switzerland, and others. The amounts of feedstock and biofuel certified, by country of origin and the type are presented in the attached file.

The scheme participants are obliged to report every 3 months amount of the products declared as the KZR INIG compliant products. Usually, 3 months period is equal to calendar quarter. Reporting is performed via IT platform. Verification of reported data is carried out by an auditor during audits. Auditors are obliged to verify the correctness of reported amounts. In case of

any discrepancies the auditor prepares the discrepancies report and send it immediately to KZR INiG.

In 2025 no esca certification was performed.

**(g) overview of the effectiveness of the implementing system put in place by the governance body of the voluntary scheme in order to track proof of conformity with the sustainability criteria that the scheme gives to its member(s). This shall cover, in particular, how the system effectively prevents fraudulent activities by ensuring timely detection, treatment and follow-up of suspected fraud and other irregularities and where appropriate, the number of cases of fraud or irregularities detected;**

According to KZR INiG, sustainability characteristic shall be assigned to every batch of the product. Specific rules are described in the KZR INiG system /7 document. The scheme does not define any specific document to be issued with a given batch, but document no. 7 requires that all information (called minimum input/output data) shall be passed throughout the supply chain.

There is a strong emphasis on the necessity for verification of validity of the supplier's certificate on the KZR ING's and other VSs website.

Any case of certificate revocation or suspension is published on KZR INiG website. In case of suspending and restoring a certificate, information about the period when the certificate was suspended is still published on the website (column "Comments").

Supervision over CBs and EOs takes into account these aspects.

KZR INiG cooperates with other voluntary schemes in order to exchange information on suspended or withdrawn certificates. A dedicated e-mail address [intercom-vs@inig.pl](mailto:intercom-vs@inig.pl) was established. The information on improved communication between schemes has been disseminated to KZR INiG participants.

In 2025 KZR INiG has been made aware about potential fraud on sunflower husk pellets market. This information was shared with other schemes operating with this market. The KZR INiG included in the internal monitoring companies handling with this material. The investigation in this area is continued in 2026.

KZR INiG perceives UDB as an effective tool in minimising the risk of fraud. KZR INiG website contains section devoted to the UDB topic <https://kzr.inig.eu/en/uniondatabase-udb-3/>.

**(h) criteria for the recognition of certification bodies;**

There is no possibility to assign the right to issue authorization of any CB to an external entity. Only KZR INiG is entitled to grant an authorization to a CB. KZR INiG is also responsible for supervision of authorized certification bodies. Specific requirements and the pathway to receive the authorisation is defined in the documents system KZR INiG/9 and system KZR INiG/10. In June 2023 Polish Centre for Accreditation (PCA) started the KZR INiG program

under the ISO 17065 standard. There were 7 certification bodies active accredited by Polish Centre for Accreditation in 2024. KZR INiG recognises supervision performed by PCA, thus in case when CB is accredited by PCA, KZR INiG does not performed verification of management system (on-site audits). However, integrity assessment and witness audits are always carried out.

**(i) rules on how the internal monitoring system is conducted and the results of its periodic review, specifically on oversight of the work of certification bodies and their auditors as well as on the system of handling complaints against economic operators and certification bodies;**

Criteria for the recognition of a certification body are set in the KZR INiG System/ 9 document.

In practice, after the agreement between the CB and KZR INiG is signed, the certification body submits its internal procedures. The procedures are assessed by KZR INiG auditors before on-site audit and later discussed during the audit. The first assessment focuses mainly on the CB's procedures and rules protecting it from conflict of interest, ensuring the independence of CB, minimizing risks of any erroneous results of the audit, supervision of the staff and their competences, procedures for implementing the KZR INiG requirements, etc). The results from internal monitoring are presented in point (a).

List of active and inactive certification bodies is published on websites <https://kzr.inig.eu/en/certification/certification-bodies/>

	<b>Name</b>	<b>Geography (address of accredited site)</b>	<b>Date of acceptance in scheme</b>	<b>EN-ISO/IEC 17065 accreditation body</b>	<b>No. of active economic operators certified by CB</b>
1.	DEKRA Certification Sp. z o. o.	ul. Legnicka 48H, 54-202 Wrocław, Poland	29.07.2014	PCA, AC 159	177
2.	SGS Polska Sp. z o. o.	Al. Jerozolimskie 146A, 02-305 Warszawa, Poland	28.08.2014	PCA, AC 152	490
3.	Bureau Veritas Polska Sp. z o. o.	ul. Domaniewska 44, 02-672 Warszawa, Poland	11.09.2014	PCA, AC 182	269
4.	TÜV NORD Polska Sp. z o. o.	ul. Mickiewicza 29, 40-085 Katowice, Poland	17.07.2015	PCA, AC 103	31
5.	Control Union Poland Sp. z o. o.	al. Wojska Polskiego 45, 65-764 Zielona Góra, Poland	03.08.2020	PCA, AC 243	70
6.	United Registrar of Systems Polska Sp. z o. o.	Wrocław 50-312, ul. Żeromskiego 62/2	26.04.2021	PCA, AC 244	418
7.	TÜV SÜD Polska Sp. z o.o.,	ul. Podwale 17, 00-252 Warszawa	01.07.2022	PCA, AC 161	42
8.	Baltic Control Certification A/S	Herstedstervej 27D, 2620 Albertslund, Danemark	22.02.2024	-	16
9.	BM Certification SIA	Jurkalnes street 15, LV-1046 Riga, Latvia	29.04.2025	-	1

#### **(j) possibilities to facilitate or improve the promotion of best practices;**

KZR INiG emphasizes the use of the same rules by every scheme participant and also by CBs and auditors. In order to achieve these goals, the following actions are taken:

- The KZR INiG organises the following types of trainings:
  1. basic training and “Improving the KZR INiG audit” training mandatory for each KZR INiG auditor,
  2. basic training “Certification for economic operators” dedicated for economic operators,
  3. workshops “GHG emissions calculations”,
  4. webinars covering one topic.
- KZR INiG takes parts and deliver presentations also during conferences organised by external entities, usually industry organizations.
- What is more, when any serious problem is detected, KZR INiG sends short clarification to the CBs via e-mail. The e-mails are also archived in the KZR INiG Module (e-platform); thus, they are easily accessible.
- Supervision over economic operators and certification bodies is supported by IT tool called “KZR Module”. The IT tool is continuously developed in order to promote best practices, minimize the risk of human mistakes and in order to facilitate process management and traceability.
- In 2025 the new issue of KZR INiG documents has been introduced (implementation of RED III). In order to facilitate implementation of these documents, special training sessions were organized. What is more, a short summary of changes was prepared. The summary indicated the scope of changes, needed actions and who the changes affects.
- The KZR INiG also provides a newsletter function. The newsletter is available to everyone; the subscription is proceeded via KZR INiG website <https://kzr.inig.eu/en/newsletter-2/>

#### **(k) information on the way the risk assessment required in Article 29(6) and (7) of the Directive (EU) 2018/2001 is made.**

KZR INiG is officially recognized by the Decision 2022/2461 for demonstrating compliance with the requirements of Directive (EU) 2018/2001. The Decision also covers forest biomass. According to the KZR INiG requirements risk-based approach in the context of verification of forest biomass criteria set out in the Article 29 (6-7) of 2018/2001 Directive is to be applied. Two processes of the risk analysis assessment were carried out in 2023 with

a validity period till 2028. However, RED III Directive has introduced significant update of requirements for forest biomass. Thus, these two risk analysis are no longer valid since May 2025.

**(I) detailed statistical information and qualitative feedback on the implementation of the esca methodology.**

In 2025 there was no case of esca verification. However, KZR INiG documents have been updated regarding the esca methodology to be in line with 2022/996 Regulation.

The Report was prepared by Delfina Rogowska