

AIC RED II Module Voluntary Scheme Annual Report 2022

a) Independence, Modality and Frequency of Auditing

All AIC RED II Module audits are completed concurrently with either the AIC TASCC or UFAS schemes by independent certification bodies appointed by AIC.

Appointed Certification bodies

During 2022 the following certification body carried out RED audits:

UFAS: LRQA (formerly Lloyds Register)¹ Kiwa Agrifood
6 Redheughs Rigg The Inspire
Edinburgh EH12 9DQ Hornbeam Square West
Harrogate HG2 8PA

TASCC: Kiwa Agrifood
The Inspire
Hornbeam Square West
Harrogate HG2 8PA

Auditing

During 2022 due to the varying restrictions on travel AIC RED II audits were carried out through a mixture of methods:

Scheme	No. Companies	No. Sites	Audit remote	Audit on site	Audit blended *
TASCC	58	75	56	0	2
UFAS	2	2	0	2	0

¹ LRQA audits until February 2022. March 2022 all audits conducted by Kiwa.

*Blended audits consisted of a portion of the audit being carried out remotely with a separate physical inspection being carried out.

b) Non-Conformances and complaints

Across the 60 audits carried out under the AIC RED II Module a total of 10 non-conformances were identified at a total of 8 businesses (i.e. 52 audits had no RED II non-conformances raised)

All non-conformances were classified as “minor” according to the scheme rules in place at the time², and all were rectified in the required timescales.

Clause Number	Clause wording	Times raised
R1.1	Scheme participants must be able to show that any procured are compliant with Renewable Energy Directive (RED II) - Directive (EU) 2018/2001	1
R2.1	Records shall be maintained and kept for 5 years in relation to a mass balance calculation – including sustainability characteristics	2
R2.1.1	Requires information about the sustainability and GHG characteristics and sizes of the consignments referred to in point (a) to remain assigned to the mixture	1
R2.4	The participant must provide to the CB by the 31st January each year an annual total of the amount of feedstocks traded	2
R3.1	Records shall be maintained in such a way as to provide sufficient information to be passed along the supply chain	2
R3.1.1	All information relating to the GHG calculation must be provided to the buyer of the goods and be clearly identifiable as to the consignment it relates to	2

² Note all non-conformances are listed according the clause numbers from AIC REDII Module V3.

Non-conformance details and corrective actions

Clause Number	Non-conformance detail	Corrective action
R1.1	Grower showing as not valid on RT website.	Received certificate of the Red Tractor farm from Lloyds Register
R2.1	<p>The business does not yet have a documented procedure that covers the requirements of mass balance or the storage and trading of sustainable goods</p> <p>Mingling of different NUTS2 regions were seen with declarations seen with incorrect NUT2 regions.</p>	<p>Procedure received which outlines the trading, storage and mass balance requirements</p> <p>Received a template for declarations and also a copy of the EU NUTS 2 region values to use and not to mingle values</p>
R2.1.1	The business does not yet have a table to determine GHG emissions for cultivation to be attributed to the different NUTS regions of the suppliers	Received excel sheet of the UK NUTS 2 regions
R2.4	No details seen available for annual total amount of feed stocks traded - 01/01/2021 - 31/12/2021	Data received from the businesses
R3.1	<p>The business does not have a suitable Sustainability declaration template to enable it to pass GHG and contractual data to the next point in the chain</p> <p>GHG value of 667 has been given for NUTS 2 region UKF3 on contract 04/08/21 however it is unclear whether this is the correct value as two charts are available one showing 770 for this region neither one is dated.</p>	<p>Sustainability template received, using the AIC one</p> <p>Information received of the values from the EU data and updated declaration</p>

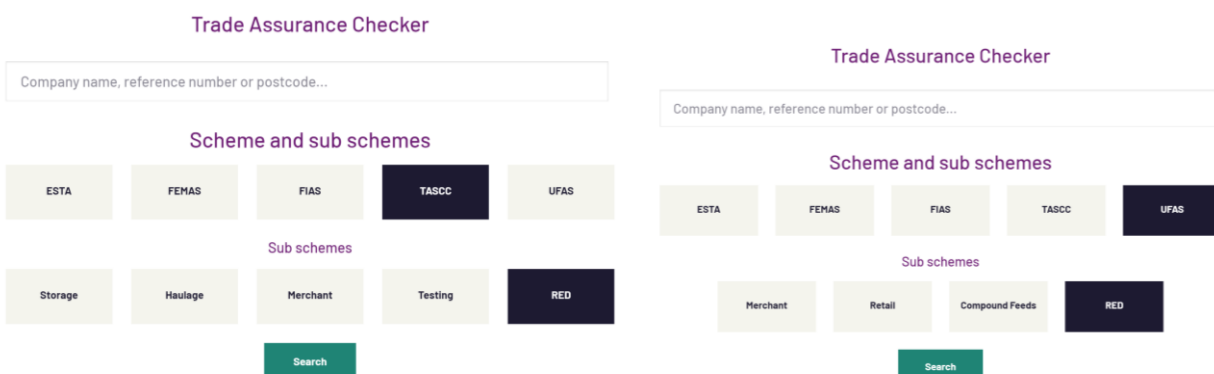
R3.1.1	<p>The sustainability declarations do not confirm that the business declares that it abides to the AIC Module for compliance with the Recast Renewable Energy Directive (RED II) - Directive (EU) 2018/2001</p> <p>GHG & NUTS2 values not seen available to confirm that details have been sent along the supply chain</p>	<p>Amended declaration with a statement added</p> <p>Received examples of declarations sent including the GHG & NUTS2 values</p>
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Complaints

No complaints were received either in relation to the operation of the scheme or in relation to the activities of certified participants.

c) Transparency

The AIC RED II Module is publicly available in English on the AIC website <https://www.agindustries.org.uk/resource/2021-aic-redii-module.html> and is not translated into any other language due to the availability of certification being limited to businesses based within the United Kingdom. The list of currently certified businesses can be found on the AIC Assurance Checker [AIC | Trade Assurance Schemes \(agindustries.org.uk\)](#) by selecting the following search criteria:



All the Certificate details listed as being required to be made public in the Directive 2018/ 2001 may be found via the register checker. Copies of company certificates are not published on the website to minimise the risk of fraudulent use. In accordance with the principles of confidentiality within ISO 17065 audit findings and audit reports cannot be published by the scheme. As part of the annual reporting requirements AIC makes available the list of all non conformances raised and the corrective actions put in place, but these are not linked to individual businesses or audits.



The screenshot shows a search result for 'G Howsam & Son' with a 'Certified' badge. The business description is 'The manufacture of compound feed; the merchanting of feed. Compliance with the Renewable Energy Directive (RED II)'. The address is 'The Mill, Chapel Road, Boston, PE22 9PW, England'. The scheme details are: 'Scheme: UFAS', 'Sub scheme: Compound Feeds, RED', 'Scheme ID: 588', and 'Expiry: 31 July 2025'. On the right, there is a login prompt and a 'Scheme and sub scheme' filter menu with the following options: UFAS, Merchant, Retail, Compound Feeds, and RED.

d) Stakeholder Involvement

Due to the entirely UK based, domestic, nature of the AIC RED Module, consultation processes are limited to close cooperation with the UK farm assurance schemes Red Tractor and Scottish Quality Crops, and the UK Arable Marketing Sector, for whom AIC is the representative trade association.

e) Robustness

All audits are carried out by trained auditors working under contract to independent certification bodies holding BS EN ISO 17065 accreditation from the United Kingdom Accreditation Service.

Audit reports are made available on request by the certification bodies to AIC.

Approval of auditors is subject to agreed criteria on qualifications and experience, with annual training carried out by the certification body.

No. of auditors: 12

Last auditor training: 18th October 2021 refresher training session completed April 2022 for internal staff and auditors who felt they wanted a refresher.

f) Market Updates

A spreadsheet containing market data for AIC RED II Module participants is attached to this report as Appendix 1.

The data reported is based on the volumes of feedstock traded by AIC RED Module participants for which RED GHG data was requested. All feedstocks are sourced from either Red Tractor or Scottish Quality Crops certified growers, and as such will duplicate some of the figures supplied by those schemes.

Number of AIC RED Module certified participants:

Companies: 58 TASCC, 2 UFAS, Total 60

Sites: 75 TASCC, 2 UFAS, Total 77

g) Conformity with Sustainability criteria

The AIC RED Module scope is limited to the trading of combinable crops produced by growers certified to either Red Tractor or Scottish Quality Cereals. The status of growers, including their compliance with the Renewable Energy Directive criteria can be found on their respective websites.

Note that both schemes require pre-registration to gain access to the approved lists.

Due to the nature of the supply chain and the market coverage of the farm assurance schemes within the UK, the risk of fraudulent activity by AIC RED Module participant is considered to be extremely low.

h) Monitoring of Certification Bodies

Under UK and European Data Protection legislation, AIC is considered to be the owner of all data collected during the course of the audit process, and as such has full access to all relevant information.

The contracts in place with appointed certification bodies also specify the requirement for access to be granted to any relevant competent authorities.

i) Criteria for Certification Bodies

AIC Feed/ Food safety schemes appoint a single certification body to ensure a consistent, robust approach to auditing. For the AIC RED module, this meant that during 2022 there were two certification bodies delivering audits (the UFAS contract was transferred to Kiwa Agrifood in March 2022).

Certification bodies are appointed following a transparent tender process and contracts are awarded for a period of 4 years.

j) Monitoring of Certification Bodies

The certification bodies are subject to annual visits by AIC Technical Managers to review the operation of all AIC schemes, in addition to the accreditation processes carried out by UKAS.

k) Improvement and facilitation of best practice

To ensure that all businesses have access to information on best practice and retain all relevant records the European Commission may consider producing a range of template documents for use by certified businesses within the recognised voluntary schemes.

The European Commission might consider adding additional feedstocks to the drop down lists on the data reporting spreadsheet. In particular for the UK the addition of Barley would be useful to avoid the use of “other cereals” or “other feedstocks” in the data.

For more information, please contact

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