



Update on ISCC EU Certifications for Waste- and Residue Based Biofuels

ISCC Regional Stakeholder Meeting Europe

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Brussels, Belgium, 03 June 2025



Objectives of this stakeholder meeting

- **Share an update on recent discussions around waste and residue based biofuels**
- **Provide an overview on measures that ISCC already implemented**
- **Provide an overview on planned measures by ISCC**
- **Recommendations for joint action**
- **Receive feedback from audience on their view, recommendations**
- **Drafting of a position paper with concrete measures for the forthcoming Implementing Regulation**



01

What is going on?

Reflection on current developments

02

What has already been done?

Measures implemented by ISCC

Measures planned by ISCC

03

What should be done in addition?

**Recommendation for the forthcoming
Implementing Regulation**



What is going on? Reflection on current developments

Reflecting on overall situation (I)

- End of 2022, beginning of 2023 first rumours about POME fraud and PoS relabelling occurred, together with rising imports of advanced feedstocks and biofuels from Asian countries
- Rumours were followed by media coverage which was partly misleading (e.g. statements that more POME is in the EU and UK market than globally available)
- In March 2023, Germany notified the EU COM about fraud allegations related to the certification and labelling of biofuels imports from China
- End of March 2025, a LinkedIn post was published - which has been removed by LinkedIn in the meantime - with “information” about a confidential meeting of the EU Committee on the Sustainability of Biofuels, Bioliquids and Biomass Fuels, established under Renewable Energy Directive, by a person who did not participate in the meeting
- Contrary to claims made via this post, no vote took place and no decisions were made during the EU Committee’s meeting. However, this post has caused considerable unrest in the market and led to irritation, which is probably what the author wanted to achieve
- ISCC has constructive dialogue with the EU COM and some EU MS and authorities as well as relevant stakeholders (e.g. industry associations)

Reflecting on overall situation (II)

- Since 2022, ISCC has implemented additional measures to further strengthen the ISCC system and to reduce the risk of potential fraud. This includes e.g. mandatory certification for palm oil mills (POME) and refineries and the application of high risk audits for Annex IX waste and residue based feedstocks
- In 2024, ISCC and the EU COM agreed on additional measures which ISCC has implemented
- Additional measures taken and planned in 2025, e.g. further scaling up of the ISCC Integrity Programme
- In a current case, the certificate of an ISCC system user was withdrawn based on findings of ISCC's Integrity programme. The processing unit was certified under a tolling agreement. ISCC informed the BLE about PoSs still in the market. The BLE has blocked the system user from accessing the Nabisy database. All PoSs of the user issued via the database were also blocked in a first step and affected Nabisy users were informed of this blocking. Later, the blocking was removed by BLE, requesting self declaration about fulfilling DD requirements (Section 17 (2) German Sustainability Ordinance)
- Industry association (e.g VDB) demanding to stop the "Principal of Trust" or at least to further clarify which due diligence requirements must be fulfilled
- The draft Implementing Decision replying to the examination request from Germany allows Germany to require suppliers to provide further evidence of compliance

Some General Reflections on the Certification Framework of the RED

- ISCC has been active for 15 years, and has been recognised by the EC since 2011
- In the first years of operation, agricultural feedstocks have been the main source for biofuels
- Over the years, the ISCC became the biggest stakeholder driven VS with more than 330 members supporting the further development of the ISCC scheme
- Changes in the policy framework (e.g. phasing out palm oil, double counting, cap on agricultural feedstocks, subquotas Annex IX (A), low GHG values) resulted in incentivisation and a massive shift towards waste and residue-based biofuels
- Without imports of advanced feedstocks and biofuels, the EU Commission's ambitious goals of decarbonising the transport and energy sector in the coming years and becoming less dependent on fossil fuels cannot be achieved
- ISCC is a certification system, not a law enforcement agency. Difficult overall situation for VS, e.g. challenges with oversight of CBs by EU MS, interpretation of mass balance requirements, unclear definitions and codes Annex IX (A), National Schemes,....
- In 2014, ISCC developed a traceability data base (Trace Your Claim – TYC) funded by the BMEL (German Federal Ministry of Food and Agriculture). The main objective of this database was to reduce the risk of fraud in biofuel supply chain. The database and its functionality was introduced to the biofuels industry, the German competent authority and the EU COM

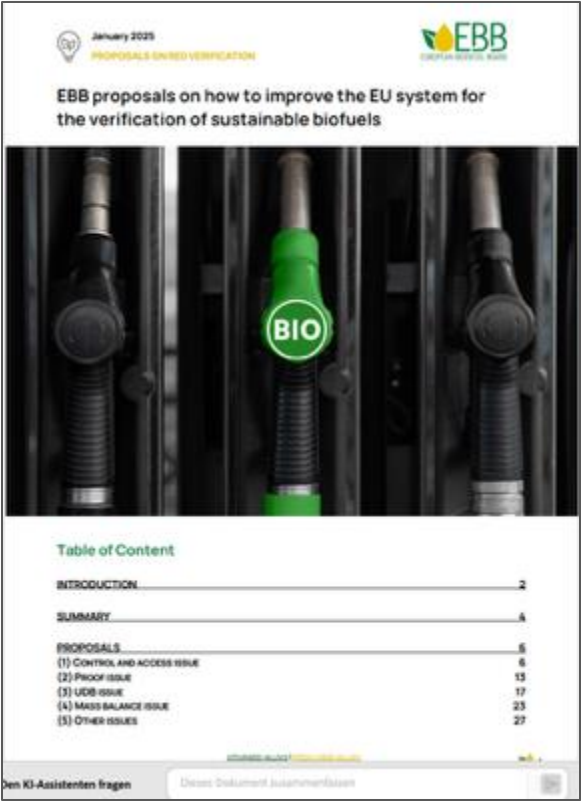
Numerous associations and other VS have already made suggestion for improving the regulative framework



RSB: Dialogue on Trust and Certification Credibility: Draft Recommendations



EWABA Position Paper on certification of cover crops and intermediate crops



EBB proposals on how to improve the EU system for the verification of sustainable biofuels



What has already been done?
Measures implemented by ISCC
Measures planned by ISCC

Key Changes of the ISCC EU scheme (I)

2023

- Introduction of unannounced Integrity Assessments
- Discussion with laboratories and customs to strengthen the cooperation and to identify measures for feedstock and biofuels analytics
- Engaging with other VS to ensure a level playing field
- Development of yield guidelines for w&r PoOs
- Collaboration with EC providing all IA data and involvement into all activities with other VSs
- Application of high risk level for all w&r Annex IX biofuel audits of PoOs, CPs and central offices
- Individual certification for palm oil mills and refineries as PoO
- Introduction of the ISCC HUB
- Development of the ISCC Mobile App
- Development of the ISCC Transaction Database with UDB integration

Key Changes of the ISCC EU scheme (II)

2024

- ISCC started the ISCC Action Plan developed in consultation with the EU COM and implementing measures to strengthen the ISCC scheme
- Improved collaboration with relevant stakeholders and law enforcement agencies:
 - Agreement on joint actions with the goal to involve authorities
 - EWABA to draft a joint statement letter to CA-RES (still pending)
 - ISCC to contact REFUREC in order to contribute to the next meeting (was turned down by REFUREC)
 - Establishing a working relationship with the European anti-fraud office (OLAF)
- Workshop and Training in China
- CB Meeting in China with all active CBs
- IA office audits in China
- Massive expansion of the ISCC IA programme

Key Changes of the ISCC EU scheme (III)

2025

- Meetings with the EU COM and EU MS to introduce and discuss measures against fraud
- Additional expert assessment of ISCC certified processing units
- Implementation of registration checks for new system users
- Stepwise roll out of the ISCC risk tool
- On-site technical assessments of processing units in China
- Remote sensing monitoring of processing units
- Implementation of additional "infrastructural" checks as part of the auditing process (e.g. geo-referenced photos)

Action plan as agreed with the EU COM in 2024

Audit Process:

Improve Audit Guidelines

Risk Tool

Mass Balance Guidelines

Increase IAs at SUs

CB Monitoring:

CB Office Audits

Witness Audits

ISCC Guidance for Sanctions

New CB Application Process

Whistle-blower Tool

Additional IA Auditors

Auditor Qualification:

ISCC Training Focus China

CB Workshop in China

Strengthen Auditor Qualification

Guidance W/R Auditing

Update W/R Training

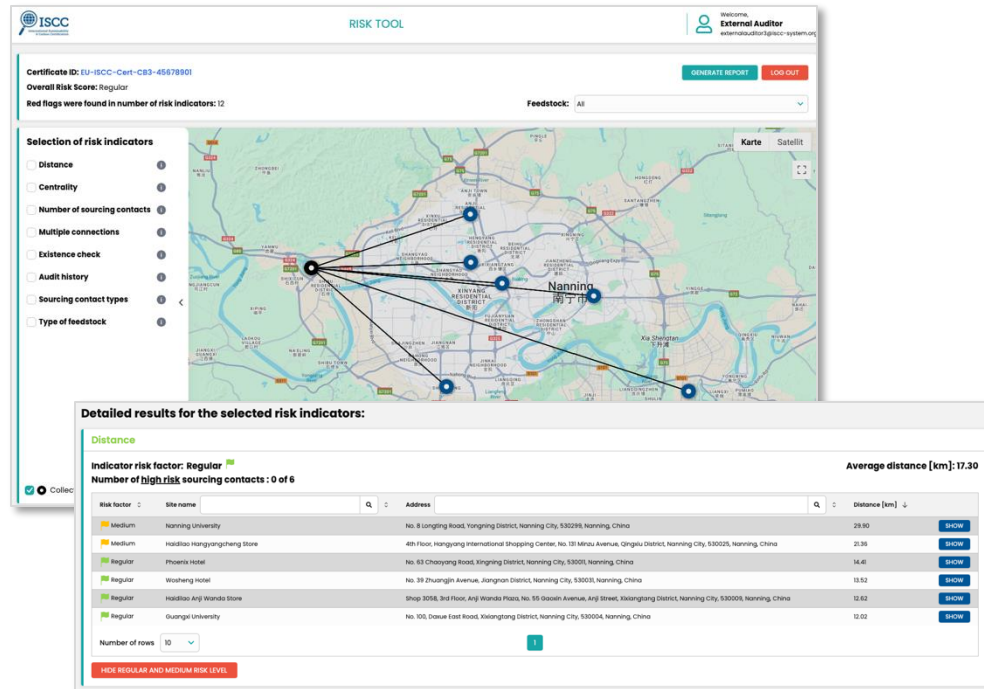
CB Cooperation:

Update ISCC 204 Document

CB Cooperation Agreement

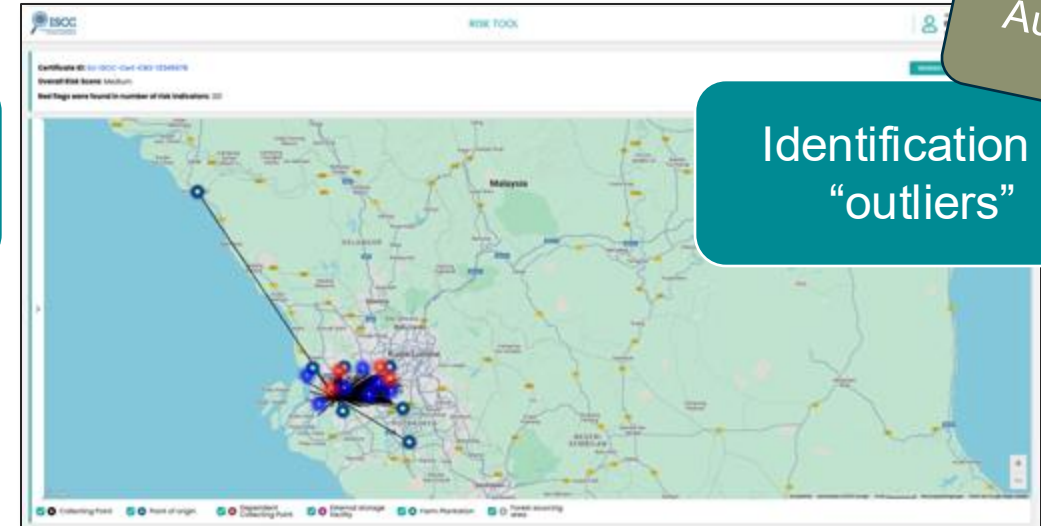
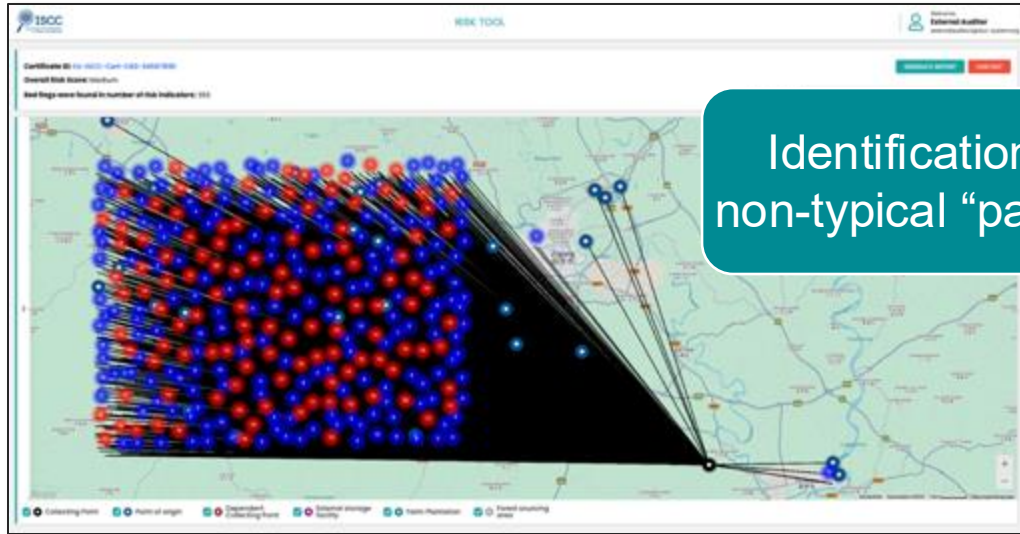
The Risk Tool supports ISCC auditors conducting the risk assessment and planning the on-site audit

Audit process

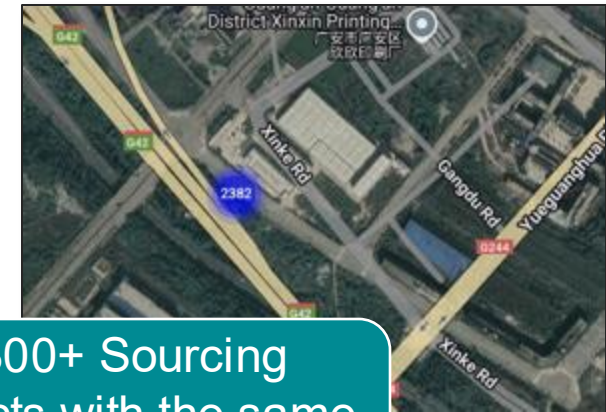
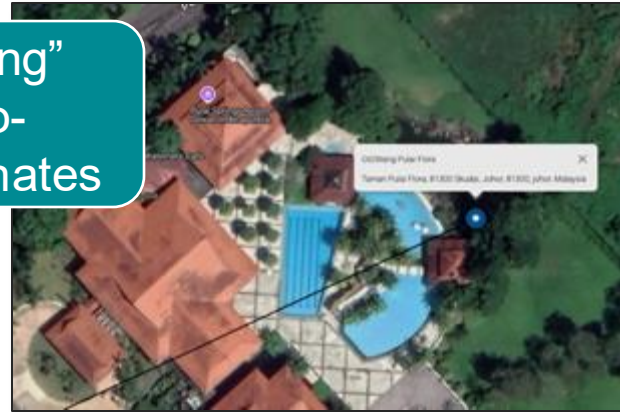
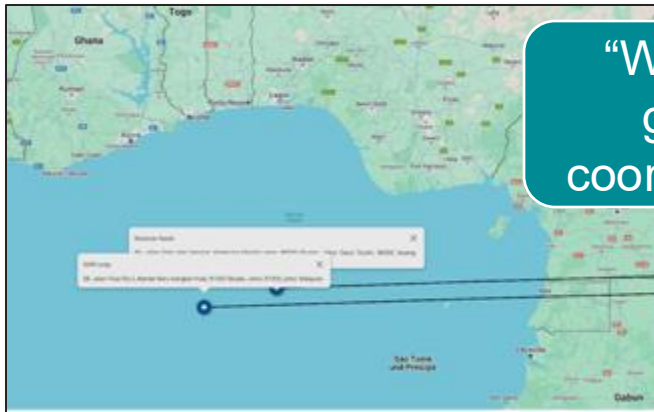


- The ISCC Risk Tool supports the auditing process
- Mapping of sourcing contacts (Points of Origin)
- Risk indicators to identify “high risk” sourcing contacts, e.g.:
 - Long distance CP – PoO
 - Misleading geocoordinates/ addresses
 - Unusual sourcing pattern
 - Plausibility check with Google API
- Focus: high-risk feedstocks like UCO, POME, brown grease, etc

The RMT improves inter alia the auditor's risk management and audit planning, e.g. by highlighting questionable patterns, implausibilities



Audit process



The guidance document on mass balance provides clearer rules and will reduce misinterpretations of criteria and errors

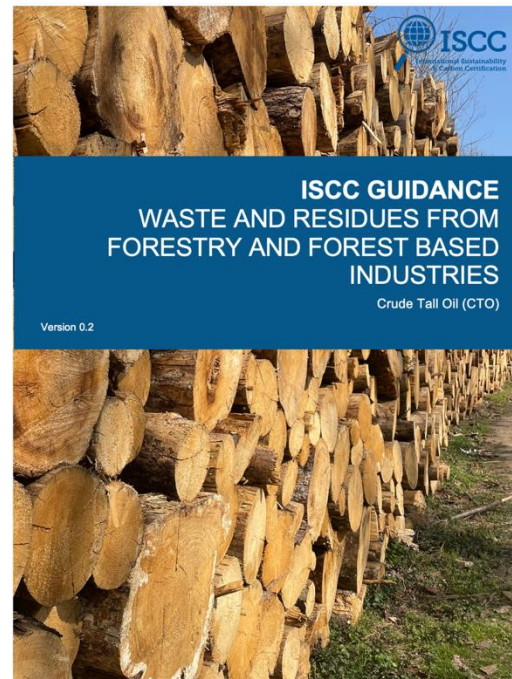
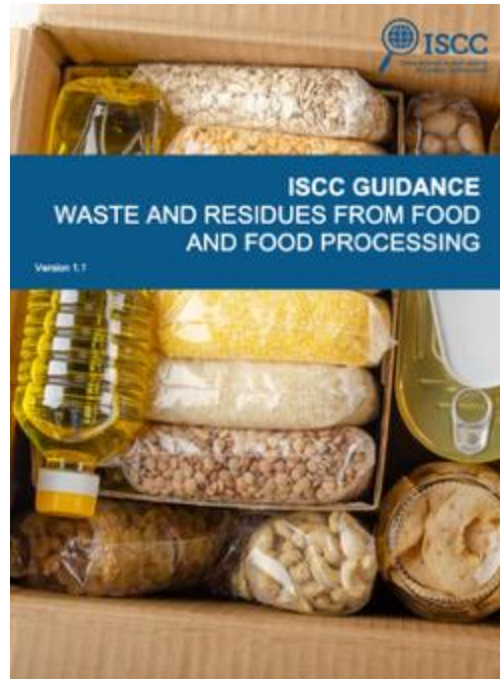
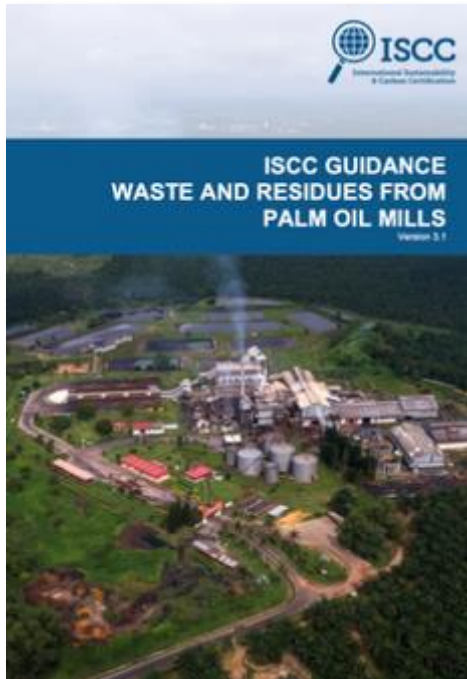
Audit process



- ISCC EU guidance document on mass balance ensures that ISCC stakeholders have an aligned understanding of the rules and limitations of mass balance. The document provides expanded guidance to complement and reinforce the ISCC EU 203 document
 - The ISCC working group on Mass Balance published (April 2025) a document to clarify on most relevant topics and provides visualization for mass balance guidelines, e.g.:
 - Classification of physical identity and product group linked to ISCC material list
 - Tolerance zone of 2-5% regarding product group criteria
 - Decision trees for assignment rules along the supply chain
 - Explanation of specific scenarios: e.g. co-processing, pipelines, biomethane/biogas set-ups
- ✓ One level playing field for ISCC system users
- ✓ Clear guidelines for auditing

ISCC is continuously expanding and updating its guidance on the auditing of waste and residue feedstocks with stakeholders

Audit process



Now public:

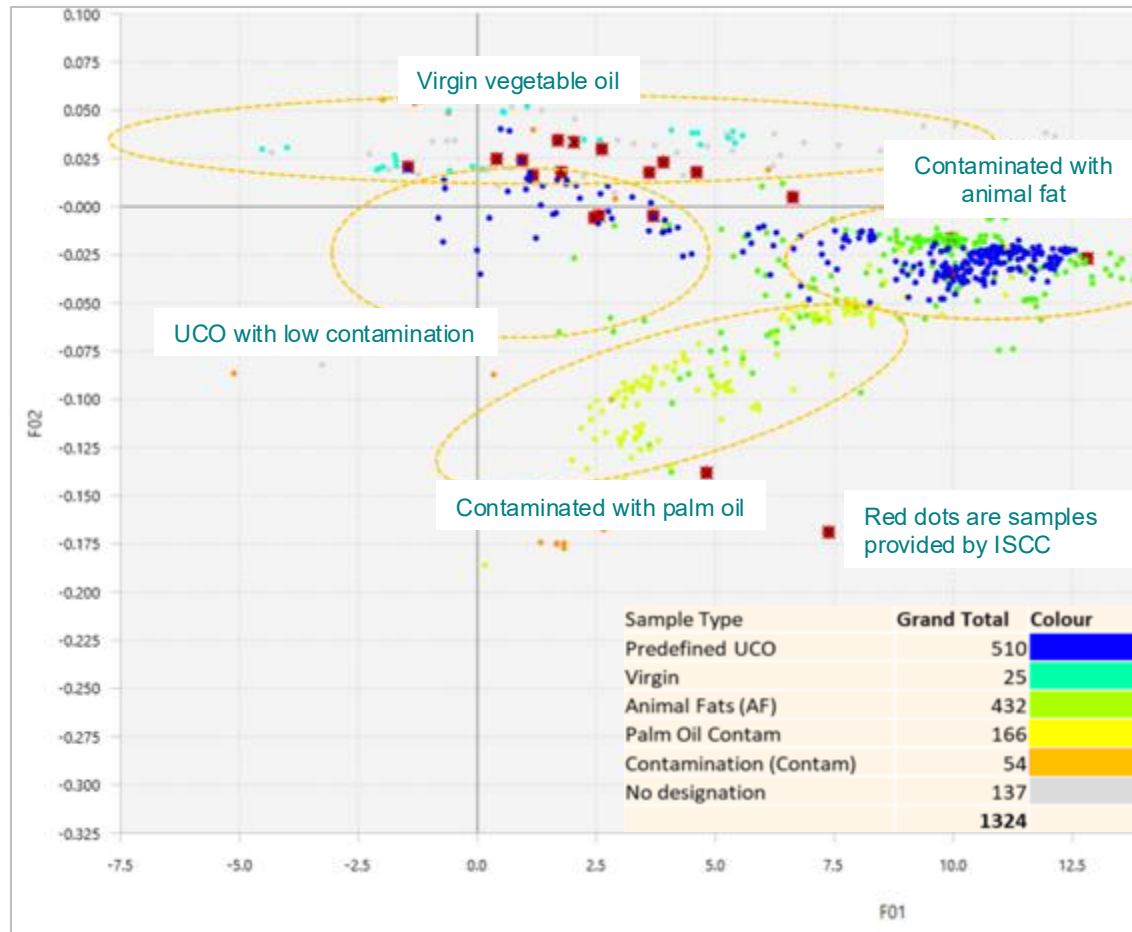
- ✓ Palm Oil Mill Wastes
- ✓ Used Cooking Oil
- ✓ Brown Grease
- ✓ Food Waste
- ✓ Sewage Sludge
- ✓ Soapstock

Coming soon:

- Spent Bleaching Earth
- CTO

ISCC conducts investigations with a leading analytical service provider to explore ways to detect UCO mislabelling

Audit process



Preliminary results:

- ISCC has taken samples in Asia and tested the capability of infrared spectroscopy for separating different contaminations.
- Methodology requires further 'training'
- Current model doesn't provide needed level of confidence
- Requires access to more genuine samples of relevant geographic origin
- Global acceptance necessary for successful deployment
- Further lab analysis scheduled

As part of the registration process, ISCC implemented "background checks" to assess the legality of companies

Audit process



- Registration checks conducted by ISCC to assess the legal validity and legitimacy of registered companies
- Cooperation with global company database to verify registration data (e.g., NTR ID/VAT ID, address, status)
- Assessment of trade register excerpt/ license to operate provided by the company
- Plausibility check using publicly available satellite imagery (e.g., Google Maps, Baidu Map)
- Real case example for a registration which was rejected after our assessment:
 - A company registered with main office in Dubai and an operating address in the Ukraine
 - No match for the company in database
 - No match or additional information on the company in e.g. Google maps, other data sources in the internet
 - No match with ISCC blacklist entries (internal ISCC database)

➤ ISCC rejected registration

ISCC expanded the integrity programme considerably, achieved a higher impact and supports authorities, when being asked for

ISCC Integrity Assessments

2024

ISCC conducted 79 assessments of which:

- 4 were CB office audits
- 2 were ISCC witness audits
- 4 were GHG desk assessment
- 1 was a desk assessment (for other reasons than GHG)
- 68 field audits at the system user's place, covering 29 countries

2025

Until May, ISCC conducted 56 assessments of which:

- 7 were CB office audits
- 4 were GHG desk assessments
- 45 were field audits at the system user's place, covering 18 countries so far

Withdrawn Certificates

2024

- **97** certificates have been withdrawn
- **130** companies suspended
- **78** excluded from re-certification (up to 60 months)

CB monitoring

Questionnaire for Technological Plausibility Check

Company/Plant:	
Date/time of the hearing:	
Date/time of the on-site plant inspection:	
Date of evaluation of provided documents:	

No.	Facts to be examined	Findings	Conclusion (OK/ Subsequent claims/ Not OK), rationale
1	General information		
1.1	Raw material well defined?	IUPAC or CAS name, usual trade name, CAS number, EC number, defined by a specification and/or an origin	
1.2	Produced substances well defined?	IUPAC or CAS name, usual trade name, CAS number, EC number, defined by a specification and/or an origin	
1.3	Technology principle comprehensible	Process is based on scientifically comprehensible conversion steps?	
1.4	(Annual) plant capacity and average capacity utilisation, information on major business interruptions in the last 2 years	The values should show how stable was the production during the audit period, whether there are indications of process changes and whether the values in the mass balance match.	
2	Technology, mass balance and energy		
2.1	Description of the plant technology available?	The description should specify the main system components and their function. Combined as text and flow diagram for better understanding. A specialist should be able to understand the technology described.	
2.2	Is the description suitable for this audit purpose?		
2.3	Mass balance available?	All significant inputs and outputs are described numerically and assigned to the substances handled.	
2.4	Mass balance suitable for this audit purpose?	The 'signed' sum of all inputs and outputs must be 0. In complex systems all important intermediate material flows should be listed too.	



Technological Plausibility Audits for Processing Plants

CB monitoring

Aim: To check that the plants are technologically capable of producing ISCC-certified materials

Four audit locations conducted in May 2025

- HEFA*/HVO** plant in Hebei Province, China
- Biodiesel/FAME*** plant in Hebei Province, China
- Biodiesel/FAME plant and treatment plant for waste/ residues in Guangdong Province, China
- Biodiesel/FAME plant in Malaysia

Next step:

- Review the audit reports
- Consolidate the findings and learnings for conducting future audits
- Incorporate audit guidelines on technological plausibility for processing plants into ISCC System Documents and ISCC Integrity Programme

*HEFA – Hydro-processed Esters and Fatty Acids

**HVO – Hydrotreated Vegetable Oil

***FAME – Fatty Acid Methyl Esters

ISCC Whistleblower tool serves as an important tool to support the detection of non-conformities

CB monitoring

The image shows a screenshot of the ISCC Whistleblower Tool website. The website has a header with the ISCC logo and navigation links: About, GOVERNANCE, Markets, Certification, Licensing, Academy, Events. Below the header is a banner for the Whistleblower Tool. The main content area is titled 'ISCC Whistleblower Tool' and contains text explaining the tool's purpose and how to use it. A sidebar on the right lists various governance topics: Multi-Stakeholder Initiatives, ISCC Association, Partnerships, Public Consultation, Quality & Integrity Management (selected), ISCC Internal Compliance, Risk Management, Grievance, Complaints, ISCC Whistleblower Tool, and Biodiesel and EU Imports from China. Below the main content, there is a 'Step-by-step process' section with a numbered list starting with '1 Welcome Page: Start by visiting the ISCC Whistleblower Tool's welcome page, where you will find legal information on the usage of the tool.' To the right of the website screenshot is a sample report form. The form has fields for 'Which company is involved?', 'What is your concern?', 'When did it happen?', 'Where did it happen?', 'Who is involved or affected?', and 'Details of your report'. There are also buttons for 'Click here to attach documents or files'.

- ISCC deployed the Whistleblower Tool which allows anonymous communication in 30 languages
- So far 46 notifications have been received. Non-conformities reported include plausibility of volumes produced by certain economic operators, questionable audit quality by certain Certification Bodies, potential mislabelling of material, and generally highlighting those operators needing further scrutiny
- The Integrity Team of ISCC deals with the incoming reports, checks content and plausibility, and, if required, requests further information as basis for investigations
- For example, Whistleblower Reports regarding traceability of material produced by certain Processing Units, led to ISCC conducting IAs, leading to the withdrawal and exclusion of the concerned economic operators
- ISCC will further promote the use of the Whistleblower Tool which has become an important tool to detect potential fraudulent behaviour

ISCC conducted two events in Shanghai, China, to train ISCC auditors and system users

- ISCC maintains a comprehensive training programme for all schemes and on various topics
- Regular trainings schedules
- ISCC training courses are designed and conducted for ISCC auditors and system users
- Regular scheme specific meeting with CBs focussing on continuous improvement of the ISCC scheme
- **As part of the ISCC action plan, an additional workshop with CBs and an ISCC auditor trainings was conducted in China in September 2024**
- November 2025, additional on-site ISCC trainings will be conducted in China

Workshop with CBs

- Audit Planning and Risk Assessment (Risk Assessment, Criteria for selection of competent auditors, Preparation of Audit)
- Audit Conduction (Mass balance requirements, Frequently detected NCs)
- Technical Review (Responsibilities and expectations)
- Group discussions on CBs best practice

ISCC Auditor Training

- Audit Planning and Risk Assessment
- Waste and Residues Supply Chains for the Chinese Market
- Mass Balance under ISCC EU
- GHG Calculations under ISCC EU and their Pitfalls

UDB will be a game changer for fraud resistance. ISCC has successfully supported system users with the onboarding process

Consistent availability for collaboration with the EC UDB Team:

- ISCC to **support ongoing testing efforts** and to provide the EC team with constructive feedback
- ISCC has **organized and hosted 5 joined UDB training sessions** in 2024
- Dedicated **team of 7 professionals** has been established
- **UDB helpdesk has been set up** to support the implementation of the UDB and to ensure continuous support for the system users

Onboarding:

- **> 99.5% successfully onboarded certificates**
(7,500 out of 7,540)
- **140 certificates were suspended** during 4 suspension processes

Implemented verification and additional checks for new certification registrations in HUB, e.g.:

- Automatic cross-check with a **blacklist for individuals**
- **Orbis score** is automatically generated as an existence check
- Manual **plausibility checks**
- **Commercial register excerpt**
- Email addresses must be **person-specific**
- **Address matching with geocoordinates**, especially for processing units located in industrial areas (in process)



What should be done in addition? Recommendation for the forthcoming Implementing Regulation

Proposal for an Improved Certification Framework

Technical assessment:

VS require comprehensive registration checks

VS require additional audit skills

Waste & Residues audits:

Mandatory PO certification for high-risk feedstocks

Reduced thresholds for on-site verification of POs

Standardisation of feedstock definitions

Introduction of regional “caps” for w/r feedstocks

VS to verify reported data on capacities, volumes

Transparency:

EC panel on feedstock availability

Publication of feedstock volumes on the certificate

Regular reporting of feedstock volumes

Public consultation for registered companies/ processing units

Verification framework:

POS data to be shared with customs

Mandatory annual reporting of SUs

Mandatory change of auditors/ CB after 3 years

Shortened certificate validity for traders

Intensification of mass balance verification

CB office in EU

Mandatory minimum audit duration

Mandatory registration checks to identify fake companies, “empty” registration before starting the certification process

1

VS require comprehensive registration checks

Situation

- No mandatory registration checks from VS
- VS use information on capacities, location, etc. voluntarily
- No mandatory “plausibility checks” for EOs, processing units

Measure

- Applicants for registration provide comprehensive technical data to VS expert
- VS to verify new registrations (processing units) using information from “market intelligence” databases focussing on verifying submitted data on capacities, location, etc.

Impact

- Recognition of “fake” companies during the registration process
- Early detection of fraudulent system users

With remote sensing based time series analysis, layout, history and changes of processing plants can be verified

This case shows no major changes in buildings, tank storage facilities over time. Results support technical assessment of processing unit



12.04.2013



13.10.2019



13.04.2024

Mandatory certification of POs at which high-risk feedstocks occur

2

VS require additional audit skills

Situation

- No mandatory requirements for auditor qualification for w/r plants
- Missing expertise for complex technical processes

Measure

- VS require specific auditor skills and training for w/r plants and introduce an on-site “technology capability check”

Impact

- Improved audit quality
- Identification of fraud on claimed (advanced) feedstocks and biofuels

3

Mandatory PO certification for high-risk feedstocks

Situation

- Group certification for high-risk POs possible
- No mandatory, on-site verifications for all POs

Measure

- For POME, PFAD, SBE, soapstock, animal fat, brown grease and sewage sludge: mandatory certification of all POs (no group certification possible).

Impact

- Mandatory verification of POs with high-risk feedstocks
- Reduced volumes of fraudulently declared feedstocks

Increased on-site auditing of POs collecting UCO and brown grease to strengthen the auditing process

4

Reduced thresholds
for on-site
verification of POs

Situation

- Threshold of 5 mt/month for all w/r feedstocks
- Fraudulent system users remain below this limit with their quantity reports in order to avoid on-site auditing

Measure

For UCO and brown grease

Reduction of the 5 tons threshold for w/r material to 3 tons to strengthen the audit process

Introduction of group certification (via CP):

- PoOs with 3 tons+ per months: sampling of the square root of all PoOs multiplied with 2 ("high risk" classification)
- PoOs with 3 tons per months or lower: on-site sample based on the number of PoO and risk level (as determined by the auditor)

Impact

- Increased number of mandatory on-site verification at POs
- Higher credibility of the auditing process
- Fraud with falsely declared waste quantities becomes more difficult

Standardised definitions for feedstocks will result in a “one level playing field” for all VS

5

Standardisation of feedstock definitions

Situation

- VS with different definitions for feedstocks
- No RED-wide feedstock/material classification
- Unequal feedstock classification

Measure

- Introducing detailed “definitions” for high-risk feedstocks

Impact

- Avoidance of misunderstandings and/or deliberate re-classification of materials and ensure a “one-level playing field” for all VS

6

Introduction of regional “caps” for w/r feedstocks

Situation

- No monitoring of feedstocks and biofuels volumes
- No “plausibility” checks for reported volumes against regional potentials from science

Measure

- Introduction of “caps” per country and w/r material once the material upload from POs exceeds certain threshold

Impact

- Capping of the volume of high-risk feedstocks per country/ region
- Identification and limiting fraudulent claiming of advanced feedstocks

VS shall verify reported volumes on certified feedstocks and biofuels using market data

7

VS to verify reported data on capacities, volumes

Situation

- No mandatory verification of reported capacities and biofuel volumes against “third party” market data

Measure

- VS to verify reported volumes using information from “market intelligence” data base, e.g. production capacities, production volumes

Impact

- Excessive, fraudulent quantity reporting can be identified
- Improved monitoring of certified feedstock and biofuels volumes

8

EC panel on feedstock availability

Situation

- No joint committee of VS, EU COM to monitor feedstocks and biofuels volumes

Measure

- VS to participate in a panel of experts for a hearing to discuss with the EC the plausibility of raw material availability data

Impact

- Collaboration enables potential cases of fraud and ‘conspicuous volume flows’ to be identified more quickly

Volumes of certified high-risk feedstocks by the PO shall be reported on the certificate to reduce the fraud risk

9

Publication of feedstock volumes on the certificate

Situation

- No report of volumes on the certificate

Measure

- For all high risk feedstocks the volume of certified feedstock must be stated on the certificate annex feedstock-specific for the last 12 months

Impact

- Market transparency on certified feedstock volumes for high-risk feedstocks
- Improved identification of fraudulently claimed volumes

10

Regular reporting of feedstock volumes

Situation

- Annual reporting of certified volumes to VS
- No mandatory verification of volumes via VS

Measure

- For all high risk feedstocks, the volume of certified feedstock must be reported every 3 months to the VS

Impact

- Improved monitoring of certified volumes via VS possible

Data on POS shall be shared with customs and law enforcement agencies to strengthen cooperation with these institutions

11

POS data to be shared with customs

Situation

- Information on the sustainability characteristics of biofuels is not shared with law enforcement agencies

Measure

- SD and POS information shall become part of customs documentation and shall be regarded as "one document"

Impact

- Improved verification measures for law enforcement agencies
- Better collaboration VS/ law enforcement agencies

12

Mandatory annual volume reporting of SUs

Situation

- Missing volume reports have no consequences with regard to certification

Measure

- Certificates of System users, not participating in the EU reporting on certified volumes will be suspended and finally withdrawn

Impact

- Mandatory reporting for all SU
- Improved data on the actual certified quantity

Mandatory changes of CBs and auditors shall increase long-term audit quality

13

Mandatory change of auditors/ CB after 3 years

Situation

- Free choice of CBs/ auditors by the SUs
- No time limit on the cooperation

Measure

- Auditors and CBs shall not work for one system user for more than 3 consecutive years

Impact

- Mandatory change of CBs/ auditors
- Improved long-term audit quality

14

Shortened certificate validity for traders

Situation

- Validity period for all certificate is 1 year

Measure

- Validity of trader certificate reduced to 6 months

Impact

- Improved verification framework
- More frequent checks of documented volumes and feedstock identity at traders

Mass balance verification shall be intensified, using “control notices” from customers & suppliers to verify e.g. reported volumes

15

Public consultation
for registered
companies/
processing units

Situation

- No publication of companies that register with ISCC

Measure

- Public consultation for new registrations in general, and/or expert panel to decide on acceptance of registration

Impact

- Transparency on system user registration
- Option to detect false/fraudulent company data

16

Intensification of
mass balance
verification

Situation

- Mass balance verification part of auditing process
- Risk-based verification process

Measure

- Intensified mass balance verification: “control notices” from customers & suppliers to verify documentation (e.g. volumes, feedstock)

Impact

- Improved control of certified volumes and feedstock declaration

CB office's shall be located in the EU to ensure that on-site integrity audits from competent authorities can be conducted

17

CB office in EU

Situation

- CB offices located in- and outside EU
- Limited “accessibility” for EU MS competent authorities to supervise acc. to IR 2022/996

Measure

- Office or representation of cooperating CBs must be located in an EU MS to ensure supervision of all CBs

Impact

- MS authorities to be able to conduct on-site audits at the CBs office
- Improved verification option

18

Mandatory minimum audit duration

Situation

- Duration of audits depends on auditor and the intensity of the verification process

Measure

- Mandatory minimum audit duration for different scopes and sizes
- Documentation via audit procedures

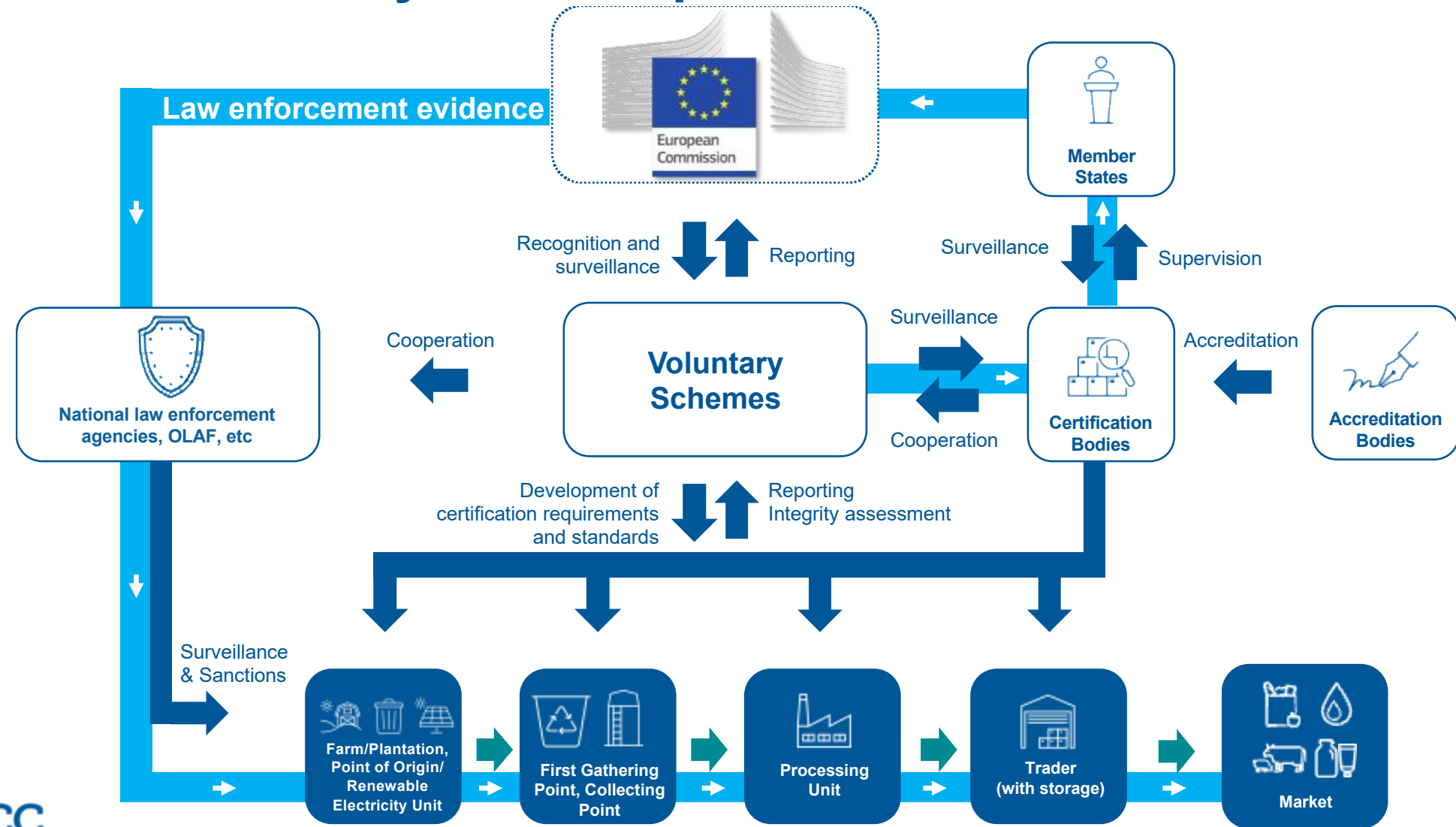
Impact

- Ensure minimum level of audit intensity
- Level playing field for auditors/ audit conduction

Institutional collaboration between VS, EU COM and MS authorities should be established

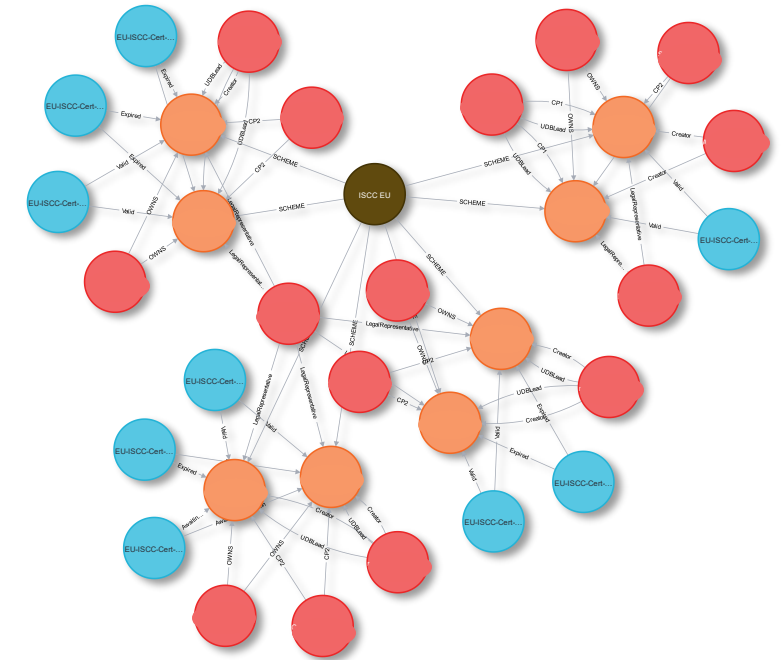
- Regular reporting to EC and MS on progress with fraud mitigation and system strengthening measures (e.g. Committee on the Sustainability of Biofuels, Bioliquids and Biomass Fuels)
- Involve EC and MS in the planning of future Integrity, Office and Witness Audits. Support of national authorities would help to travel along supply chains
- ISCC to conduct audits in third countries on demand of EC and/or MS
- Access to vessel cargo information and analysis of supply chains together with MS port authorities and customs
- Customs approval to take lab samples and/or customs offering lab service support
- Exchange format for integrity auditors and MS law enforcement agency staff in order to exchange ideas and include important assessment features into the IA processes and check lists
- Together with OLAF collaboration with MS law enforcement agencies in suspected cases where raiding the premises would be necessary to prove fraud

Improving the fraud resilience of the RED system only works, if all partners in the system cooperate in an effective manner



ISCC aims to develop an IT tool to assess data on certified companies, etc identifying fraudulent patterns

- Fraudsters work in a defined business environment and usually follow a pattern
- Analysis of e.g.
 - Blacklisted auditors (supporting network, correlation scopes/ material)
 - Fraudulent companies (certificates, employees involved, audit history)
 - Sourcing contacts (multiple business partners (CPs))will help to understand such pattern
- Data quality and data availability crucial for this analysis
- Cooperation between VS, EU COM, EU MS, UDB will support such an undertaken ensuring the needed data availability
- Using data from VS system & the UDB might enable verifiers to uncover the business environment of a detected fraudster and to recognize fraud patterns at an early stage
- ISCC is aiming to develop such a tool and to work on such an initiative



Symbol: Network of ISCC certified companies

Conclusions

- Economic operators have abused the RED, MS controls and the certification framework to make fraudulent claims on certified biofuels
- No certification scheme is perfect. ISCC continuously improves its system and will implement whatever it takes to ensure integrity. Many measures are already implemented and more to come.
- However, it needs common actions to further strengthen the entire RED system. Not a single stakeholder is able to fix the whole system. ISCC is interested in establishing confidence in the RED with directing attention to practical improvements that are needed and already in progress
- ISCC would be happy to establish an improved collaboration with the relevant EU, MS authorities and law enforcement agencies to ensure that fraudulent behaviour is punished and gains consequences for companies involved
- Together with our ISCC members, ISCC would like to develop the needed measures and steps to improve the credibility of certification under the RED and to strengthen the future verification framework
- ISCC is looking forward to today's discussion and your feedback. The main objective is to develop a common position paper documenting the current status and proposed measures for improvements to avoid unfair competition

Outline position of the ISCC Regional Stakeholder Committee Europe on concrete action to improve w/r situation

- Background (brief)
 - Current situation
 - Measures taken by ISCC and improvements achieved
- ISCC measures
 - Already implemented and agreed on with COM
 - Planned measures (incl. recommendations from today)
- Recommendations for Implementing Regulation
- Call for joint action
 - Position Paper to be sent to COM and published on ISCC Webpage
 - Institutionalisation of Information Exchange (EC, MS, VS) and joint action



Thank you!

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