



ewaba

European Waste-to-Advanced Biofuels Association

WASTE / RESIDUES ISSUES AND NECESSITY FOR ACTION

ISCC EU Stakeholder Committee

Berlin 21st May 2019

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BDI 
BioEnergy International

 **ewaba**
European Waste-to-Advanced Biofuels Association


adriaticali
ECOLOGIA DELLE IDEE

MVAK
Mittelstandsverband abfallbasierter Kraftstoffe

biocomenergia

 **Iniciativas
bioenergéticas**


olleco
Supply. Collect. Convert.

 **BIOARAG**
biodiesel aragón sl


verd

 **prio**
energy

Greenenergy

 **Argent
Energy**

MÜNZER 
BIOINDUSTRIE



 **REG**

HARD · LEVEL

 **EVONIK**
INDUSTRIES

ΠΡΑΣΙΝΑ ΑΔΙ

 **ENVIEN**
GROUP

 **Green Biofuels Ireland Ltd**
CREATING POSITIVE ENERGY

vanWijk&Olthuis
oliën•vetten•vetzuren

won
www.wasteoilnet.bg

 **Trafin Oil**  **Sabio fuels**
SUSTAINABLE ADVANCED BIOFUELS

Background - I

- REDII: good outcome for waste feedstocks
 - Double counting
 - Highest values in annex V
- Challenging aspects
 - Aviation incentives
 - 1.7/3.4% limitation
- EWABA contacts with national authorities re REDII implementation
 - Fraud allegations
- When historically confronted with fraud allegations...
 - Origin- competitors from industry at large
 - Unsubstantiated claims
 - Last major scandal – Poland in 2016 – Pure vegetable oil

Background - II

- **Disclaimer for today...**

Let's restate the obvious

- Waste is targeted because of its higher sustainability premium
- Fraud is harmful
- Unfounded allegations- **great legitimacy damage**
- Actual fraud - **Companies who cheat unfairly compete against compliant ones**
- **Allegations or actual fraud – the spotlight is on ISCC**

Background- III

- REDII places great emphasis on:
 1. GHG Savings
 2. Multipliers
 3. Enhanced Sustainability

- Therefore:
 1. National authorities
 2. Obligated parties
 3. Value chain

**Need to be confident
on ISCC**

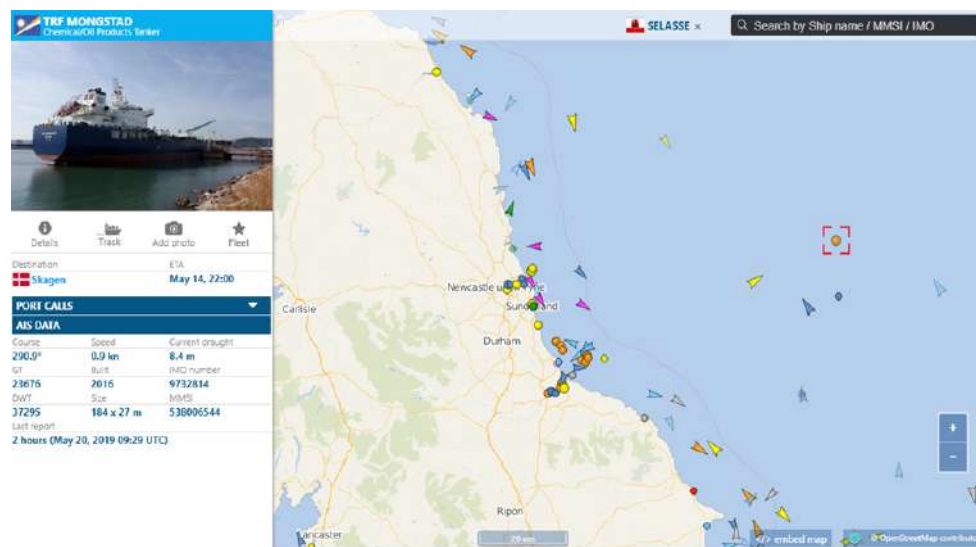
**→ Acute need to
improve ISCC**

Background IV

- This is **not only about Chinese UCO**
 - Crop-based with implausibly high GHG savings
 - Multiple counting advanced biofuels from Part A Annex IX
 - Multiple counting aviation and maritime fuels
 - Confidence in the sector as a whole
- Measures identified by the ISCC Technical Committee on Wastes and Residues
- Role and input of EWABA members

More Surveillance Audits

- **NEW ISCC wistleblowers page**
- **Allegations need to be substantiated**
- Use trade experts; ship brokers, customs, surveyors, analysts
→ **Understand irregular market flows**
- Targeted & ad-hoc Raids
- **Sense of fear from non-compliance**
- Include checks on live consignments
- Increase ISCC Surveillance budget



Imports to UK Terminals								
Port	Vessel	Dates	Suppl/Rcvr	Charterer	Grade	QTY	Unit	Last Port
IMMINGHAM	TRF MONGSTAD	SLD: 14.05.19	GREENERGY	GREENERGY	USED COOKING OIL	3500	MT	ROTTERDAM VIA IMMINGHAM
TEES								
TEES	TRF MONGSTAD	SLD: 15.05.19	GREENERGY	GREENERGY	USED COOKING OIL	3000	MT	IMMINGHAM

Audit Scope

Focus on auditors

Auditors' objective is to find fraud, not to easily issue certificates

→ Check all volumes, all purchases, all sales of biofuel and feedstock

Physical Checks

- Guidelines for typical products – not conclusive or characteristic, yet a valuable indicator

	Test method	UCO			Rapeseed oil	Palm oil	Soyabean oil	Tallow
		Min	Typical	Max				
Molasses & Impurities % wt	Ca 2c-25	1%	1.50%	40%	0.1	0.1	0.1	1.5
Free Fatty Acid %	Ca 5g-40	1%	0%	15%	0.5	0.5	0.5	0.5
EN 15344:01								
Sulphur (ppm)	EN 13032	18	27	150	<10	<10	<10	50
Iodine Value	Ca 1b-87	55	75	120	105	50	130	40
Polymers								
triglycerides		0.10%	2%	30%	0.5	0.5	0.5	0.5
Smell		Niise	like food ozone	rancid black & yellow/orange sediment	clear yellow	clear red	clear yellow	yellow white opaque
Colour		Light yellow some sediment						
Density at 15C (kg/ml)		0.9	0.91	0.93	0.91-0.917	0.92-0.94	0.92-0.927	0.936-0.952
GC Profile		Mixture of originating oils C16-C18			static C16-C18	static C16-C18	static C16-C18	static C16-C18
Melting point C		0	10	30	0	30	0	35

Vegetable oil source: http://www.dgftt.dk/material/physicalchecks_signs.html#oil

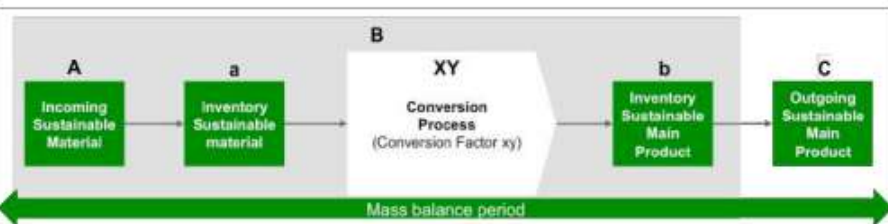
Extra transparency: adapt ISCC Terms of Use & System Documents to give access to;

- Purchase & Sales Ledgers
- Commercial & Shipping docs - all Contracts, COA, BL, Invoice, Customs
- Stock reporting systems – not just ISCC mass balances
- Corroborate with 3rd parties**; Terminals, customers, suppliers, inspectors, other Auditors/CBs.

ISCC Global Mass Balance – Central Database



- Maintain an Annual Mass Balance
- **All volumes produced and consumed yearly / monthly**
- Feedstock & Biofuel production & Consumption
- Audit reports as data source – compiled by ISCC
- Verify whether traded volumes balance
- **Identify**
 1. **Irregular trade flows**
 2. **Impossible claims**
- Move toward Nabisy / Trace Your Claim



Grimmer consequences of non-compliance

- ISCC should require **Company Directors to be named on application, not administrators**
- **Fines** for Major and Minor Non-Compliances
- Reasons for withdrawn published online
- Companies with withdrawn certificates:
 - Not allowed to trade under different name
 - Not allowed in other certification schemes
- Automated email to all uses indicated company and Director's name
- Non-compliance should be **TERRIFYING!**

To conclude

- ISCC's task is to **assure credibility**
- Improvements needed immediately – **right steps are being taken** – need to avoid complacency
- No point in ISCC if national ministries cannot trust whether an ISCC certificate is of waste, pure vegetable or fossil origin
- **If Member States become less ambitious on biofuels because of lack of trust on ISCC → whole systemic failure**

THANK YOU!

Questions?

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