

Practical Certification Approach for Smaller Companies



Stakeholder Feedback: Current Market Challenges

Beginning of supply chain:

- Start-up companies with similar processes, inputs and outputs (e.g. pyrolysis oil) in pilot/experimenting phase
- Production of low amounts of certified output
- "Market survival" unclear
- Individual certification not feasible

• Entities downstream of final converter:

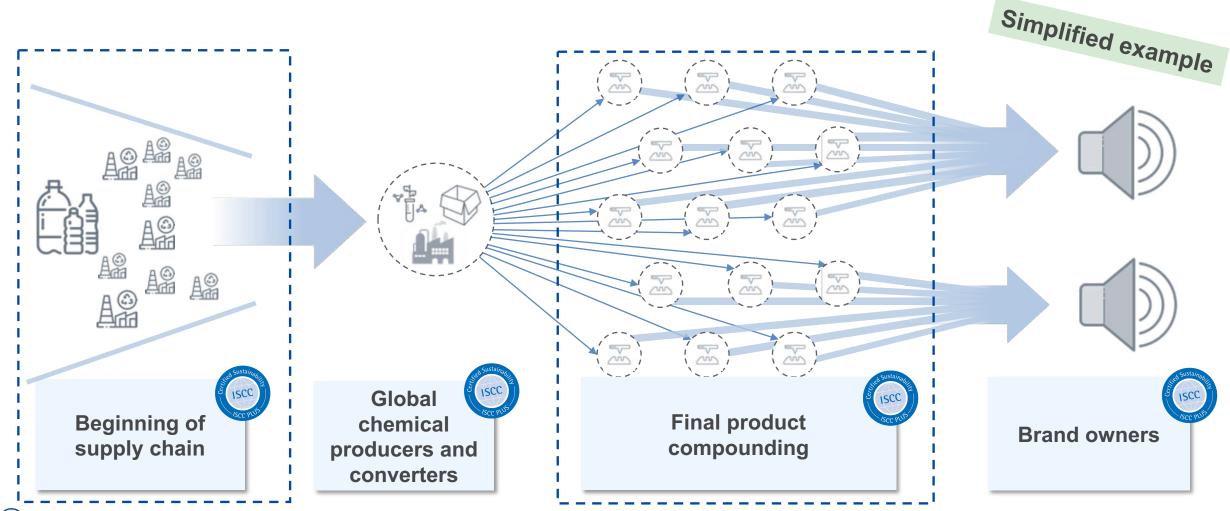
- Segmented supply chains with many acvities involved, e.g.
- Assembling, compounding, laminating, printing
- Hundreds to thousands actors receiving ISCC certified material without changing physical properties
- Low risk but volumes still need to be controlled

HOW TO COVER WITH CERTIFICATION?





An adapted certification approach for smaller companies could help to scale-up ISCC certification for the circular economy and bioeconomy







Prerequisites for low risk small companies covered by group certification

Definition small entity:

- one production site
- production capacity of maximum 1000 metric tons of certified outgoing product per year

• Audit approach:

- < 100 t: self-declaration to group head; no sample based audit required (however, if deemed necessary, auditor would still have the right to audit)
- 100 1000 t: self-declaration and potentially part of sample (acc. to ISCC 204 and 206)
- > 1000 t: individual certification → not a small entity anymore
- The head of the group is certified and responsible for the integrity of ISCC certified product through its Internal Control System
- Flexibility for head of group to add further small entities throughout validity period of certificate

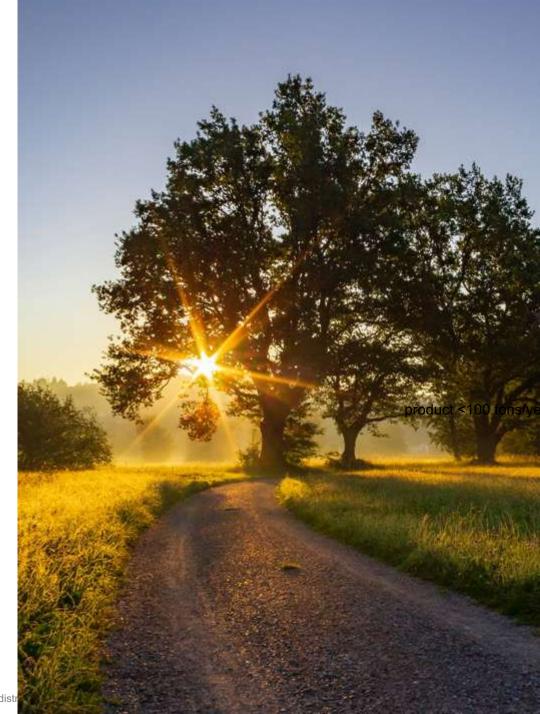
Important aspects for a group certification audit at the group head for small units

- List of all suppliers of sustainable material (incl. individually certified suppliers and small units supplying/receiving sustainable material under a self-declaration)
- Self-declarations forms signed by small units
- Risk assessment and internal audits conducted by group head at small units
- Chain of custody audit:
 - Plausibility check of sustainable material received and sold
 - Mass balance
 - Sustainability declarations/ delivery documents
- For upstream PU specifically:
 - Incoming material is a waste (acc. to ISCC 201-1; national classification, official waste code, waste transfer notes)
 - Relevant licences to operate (e.g. collecting and handling waste materials)
 - List of suppliers of plastic waste



Way forward

- Practicability to be tested in pilot with interested companies and supply chains?
- Discuss feedback and learnings
- Integration into ISCC Documents (System Document, audit procedures, self-declaration for group members)







Many Thanks and Happy Holidays!

