



Recent Developments and Market Expansion of ISCC PLUS

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Draft implementing Act – SUP beverage bottles – Rules for calculating, verifying and reporting recycled plastic content



- Laying down rules for the application of Directive (EU) 2019/904 of the European Parliament and of the Council as regards the calculation verification and reporting of data on recycled plastic content in **single-use plastic (SUP) beverage bottles**.
- Focus on **mechanical recycling**
- Rules for **controlled blending, mass balancing/ attribution (chemical recycling)** to follow likely in Q4

Data ISCC PLUS delivers today and what can be delivered in future regarding draft IA

- Most information already available in ISCC PLUS certified value chains today, e.g.:
 - Definitions of post consumer waste and recycled plastic
 - ISO 22095-202 (“chain of custody”)
- Some adaptations required (e.g. definition of a “bottle“ (body, cap, lid, labels, sleeve), more detailed definition on data in **ISCC PLUS sustainability declaration**

ISCC PLUS Sustainability Declaration:

TODAY

- quantity recycled material
- Total quantity (optional)
- Tickbox “mechanical recycling“
- Tickbox “mass balance“
- Tickbox post consumer material

FUTURE (to fulfill data requirements of IA)

Additionally:

- Mandatory to provide total quantity (batch)
- Mandatory to provide recycling share
- ...

Position papers opt for an “Energy-excluded” mass balance approach without defining details yet

Cross sectoral statement on the policy framework needed to deliver recycled content in key plastics applications

To conclude, the undersigned associations call on the European Commission to use the SUPD legal basis to adopt in 2023 EU calculating rules enabling the use of a mass balance credit method with a fuel-use exempt model to calculate the chemically recycled content in plastics. In addition, there should be clarity and coherence on these rules across other pieces of legislation addressing recycled content in plastics and non-plastic chemical materials. This would boost the circular economy, strengthen the EU's strategic autonomy in raw materials and contribute to meet climate targets.



Mass Balance – credit method:

The position of the signatory producer responsibility organisations as regards chains of custody, and in particular mass balance and the credit method with a view to developing new plastics recycling technologies is as follows:

- We deem it necessary to limit use of the **Mass Balance – credit method chain of custody approach** to thermal conversion technologies for using non-fuel petrochemical products.
- Temporary tolerance could be allowed for the sole upscaling phase of the other technologies (depolymerisation, dissolution) to support their development and ultimately achieve chain of custody models that are more precise, such as segregation² or controlled blending³ models.
- To establish the method's credibility when applied to recycling, we recommend excluding products of steam cracking for energy applications from conversion factor calculations determining the quantity of credits, while retaining free allocation of these credits within non-energy products to address the sectors most in demand for recycled material (Option 3 "Fuel exempt", see diagram in appendix).

POSITION PAPER

Chemical Recycling: Delivering recycled content to meet the EU's circular economy ambitions – the Single Use Plastics Directive Implementing Act and the Packaging and Packaging Waste Directive revision

The chemical industry is committed to boosting the circular economy by delivering recycled content which is urgently needed to strengthen the EU's strategic autonomy in raw materials and meet climate targets. This requires a clear and enabling EU legislative framework which increases the recycled content of materials in a cost-efficient and transparent manner with limited environmental impacts¹, while taking into account the complexity of chemical processes. **The use of a third-party certified mass balance chain of custody method, with a fuel-use exempt model, is seen as indispensable to meeting the EU's climate and circularity targets in time by leveraging Europe's existing industrial infrastructure.** The framework should ensure a harmonised and predictable approach across the many pieces of EU legislation that address recycled content.

Chemical Recycling in a Circular Economy for Plastics

A Vision and Principles Paper

ISCC is studying options to implement an energy excluded attribution in pilots at system users

Status

- ISCC Working group on mass balance discussed several implementation options
- Pilots ongoing at ISCC PLUS system users
- Pilot partners are gathering data to evaluate
 - implications of different implementation options,
 - handling of dual-use products exemplary for, specific certified processing units
 - verification options for usage of products
- Focus on refineries and steam crackers due to presence of dual-use and fuel products
- Exchange with industry associations and regulators

Objectives and way forward

- Development of a potential implementation approach which is secure, credible, has an appropriate audit complexity and is practically feasible for system users
- Be prepared to implement as an additional attribution option, if EC decides to integrate in SUP regulation (mandatory only for specific markets and regions)

ISCC discusses with several system users potential pilot studies for PCFs of mass balanced products

- Identification of potential pilot studies at ISCC PLUS system user (concept paper), first challenges at ISCC system users identified
- Evaluation of possibilities to calculate product carbon footprints of mass balanced products at ISCC system user in pilot studies
- Iterative approach with specific solutions in pilot studies and the objective to cover broad range of setups to generalize approach
- Objective: Alignment of mass balancing regulations with PCF norms and standards to achieve a PCF norm compliant attribution
- Approach to be based on existing norms and standards
- GHG working group will be set up to discuss way forward

The ISCC EU RFNBOs System Documents build the basis for RFNBOs Certification

- ISCC developed a certification approach for Renewable Fuels of Non-Biological Origin (RFNBOs)
- Approach is based on delegated legislations as adopted in Feb. 2023*
- Approach was successfully tested in pilot audits that were initiated by the Dutch authorities EZK and RVO**
- ISCC submitted the RFNBO System Documents to the EC for recognition in March 2023
- **ISCC EU RFNBO certification audits will be possible, once recognition is in place**

* Draft delegated regulation on establishing a Union methodology setting out detailed rules for the production of RFNBOs and Draft delegated regulation on establishing a minimum threshold for GHG savings of recycled carbon fuels and by specifying a methodology for assessing GHG savings from RFNBOs and from recycled carbon fuels.

** Dutch Ministry of Economic Affairs and Climate Policy (EZK) and Netherlands Enterprise Agency (RVO)



Final results of pilot audits by independent certification body



Thank you!

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