



ISCC STAKEHOLDER DIA
REGIONAL COMMITTEE I

ISCC CORSIA 102 GOVERNANCE

Version 2.0



Copyright notice

© 2023 ISCC System GmbH

This ISCC document is protected by copyright. It is freely available from the ISCC website or upon request.

No part of this copyrighted document may be changed or amended. The document may not be duplicated or copied in any form or by any means for commercial purpose without permission of ISCC.

Document Title: ISCC CORSIA 102 Governance

Version 2.0

Content

Summary of Changes	5
1 Introduction	7
2 Scope and Normative References	8
3 ISCC’s Goal and Mission.....	8
4 CORSIA and Sustainable Aviation Fuels	9
5 ISCC: A Multi-Stakeholder Organisation.....	10
6 System Documents, Updates and Public Consultation	12
7 ICAO, Records, Reporting and Processes.....	13
8 Transparency.....	15
9 Quality and Risk Management	15
10 Conflict Resolution.....	18
10.1 General Provisions and Definitions.....	18
10.2 Complaints.....	19
10.3 Appeals.....	21
11 Non-conformity and Sanctions	23
11.1 General Provisions.....	23
11.2 System Users	24
11.3 Certification Bodies	28
12 ISCC Integrity Programme	32
12.1 Overview.....	32
12.2 Integrity Assessment at ISCC System User	32
12.3 Integrity Assessment at Certification Body Office.....	36
12.4 CB and Auditor Evaluation and Classification	37
13 Internal Monitoring.....	39

14 ISCC Impact Assessment..... 39

15 Annex I: ISCC Quality Guidelines 41

Summary of Changes

The following is a summary of all content changes to the previous version of the document (ISCC CORSIA System Document 102, v1.1). Minor amendments which do not affect the content, e.g. corrections of phrasings, marginal notes, amendments of graphics, etc. are not listed.

Summary of changes made in version 2.0	Chapter
General: All references to the “ISCC CORSIA PLUS Principles” have been changed to “ISCC Principles”.	
Amendment: Change of reference from Renewable Energy Directive (RED I) to RED II (referring to Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources (recast)).	1
Amendment: Paragraph on distinction between ISCC CORSIA and ISCC CORSIA PLUS slightly edited.	1
Addition: Paragraph on LCAF certification not yet being possible under ISCC CORSIA.	1
Amendment: Paragraph on requirements for CORSIA eligible fuels slightly edited.	4
Amendment: A list of ISCC System Users being <i>excluded</i> due to serious non-compliances with ISCC and the period of <i>exclusion</i> (“blacklist”).	8
Addition: Explicit mention of ISCC CORSIA Training as part of the comprehensive overall ISCC training program.	9
Amendment: Paragraph on the ISCC Impact Report moved from chapter 9 to chapter 14, with slightly adjusted text.	9
Amendment: ISCC Quality Guidelines have been moved from chapter 9 to the Annex.	9
Amendment: Chapter 10.2 changed from „Conflict Resolution Process“ to „Complaints“.	10.2
Addition: Paragraph giving more details about handling of complaint from ISCC side.	10.2
Addition: <i>“ISCC will react to any information and evidence received within 10 working days of receipt...”</i>	10.2
Addition: Chapter 10.3 “Appeals”. The information on appeals and the arbitration process were previously included in chapter 10.2	10.3
Addition: <i>“ISCC will re-evaluate the complaint within 10 working days after receipt of the appeal, or, if additional evidence is requested from the complainant, within 10 working days after ISCC has received the relevant evidence.”</i>	10.3
Adjustment: Set up of the arbitration process	10.3
Amendment: Division of chapter 11.2 in chapters 11.2.1 “Non-Conformities and Sanctions of System Users” and 11.2.2 “Fraud Investigations or Suspicion of Non-Conformities”	

Summary of changes made in version 2.0	Chapter
Addition: Minor non-conformities <i>must</i> be corrected by implementing appropriate corrective measures within a specific time frame <i>up to a maximum of 12 months or the next audit (surveillance or recertification audit). The corrections must be verified by the CB during the next audit at the latest.</i>	11.2.1
Addition: Paragraph on suspending the validity of the certificate by the certification body.	11.2.1
Addition: List of non-conformities considered as critical under ISCC CORSIA.	11.2.1
Addition: Paragraph on handling sustainable material while System User is suspended or excluded.	11.2.1
Addition: Chapter Fraud Investigations or Suspicion of Non-Conformities	11.2.2
Addition: <i>“Furthermore, ISCC reserves the right to impose a contractual penalty in case there is a violation against the ISCC requirements”</i>	11.3
Amendment: Sanctions and measures for a Red Card	11.3
Addition: The ISCC Integrity Programme consists of <i>on-site and/or remote</i> assessments of ISCC System Users, <i>the performance of individual auditors</i> and of CBs.	12.1
Amendment: The participation of ISCC System Users in a scheduled ISCC Integrity Assessment is mandatory. Refusal to participate <i>is</i> considered a <i>critical</i> non-conformity with the ISCC requirements	12.1
Addition: <i>“Participation of System Users in ISCC Integrity Assessments may be requested by ISCC up to 18 months after the end of the last ISCC certificate.”</i>	12.2
Addition: Paragraph on unannounced Integrity Audits.	12.2
Addition: Paragraph for granting access to ISCC Integrity Auditor.	12.2
Addition: Paragraph on cross-checking of documents by ISCC Integrity Auditor.	12.2
Addition: <i>“Individual auditors may have to receive specific training and/or may only be able to conduct further audits under specific conditions (e.g. only if accompanied by further auditors)”</i> under procedure if performance needs to be improved	12.4

1 Introduction

ISCC – International Sustainability and Carbon Certification is an independent multi-stakeholder organisation providing a globally applicable certification system for the sustainability of raw materials and products. ISCC is a multi-feedstock system. The ISCC certification system is applicable to entire supply chains and for different sectors and markets: bioenergy (biofuels and bioliquids), food, feed and chemical/technical markets.

Multi-stakeholder organisation

ISCC is the organisation responsible for the development, surveillance, revision and continuous improvement of the ISCC certification systems. ISCC operates different certification systems. These systems are ISCC CORSIA, ISCC CORSIA PLUS, ISCC EU and ISCC PLUS.

ISCC

ISCC CORSIA and ISCC CORSIA PLUS are certification systems for sustainable aviation fuels demonstrating compliance with the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). CORSIA was developed by the International Civil Aviation Organization (ICAO) and requires the aviation industry to offset growth-related Greenhouse Gas (GHG) emissions from 2020 onwards. Emissions are offset by aeroplane operators through the purchase of carbon credits that are generated by climate protection projects. However, an aeroplane operator can reduce its CORSIA offsetting requirements in a given year by claiming emissions reductions from the use of sustainable aviation fuels (SAF). In order to become eligible as so-called CORSIA Eligible Fuels (CEF), such fuels shall come from fuel producers that are certified by an ICAO approved Sustainability Certification Scheme.

CORSIA

The objective of certification under ISCC CORSIA is to ensure that SAF complies with the CORSIA Sustainability Criteria for CORSIA Eligible Fuels.¹ The objective of certification under ISCC CORSIA PLUS is to ensure that SAF complies with the CORSIA Sustainability Criteria for CORSIA Eligible Fuels and to address additional sustainability requirements.

ISCC CORSIA and ISCC CORSIA PLUS

The certification of lower carbon aviation fuels (LCAF) as CORSIA eligible fuels is not yet covered under ISCC CORSIA. Consequently, the ISCC CORSIA system documents do not currently address LCAF certification. Once approval for LCAF certification is granted by ICAO, requirements for LCAF certification will officially be integrated into the ISCC CORSIA system documents.

LCAF certification

ISCC EU can be used to demonstrate compliance with the legal requirements of the EU's Renewable Energy Directive 2018/2001 (often referred to as RED II)².

ISCC EU

¹ In accordance with ICAO document 05 CORSIA Sustainability Criteria for CORSIA Eligible Fuels

² Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources (recast), in the following referred to as RED II

ISCC PLUS

ISCC PLUS is a certification system for all markets and sectors not regulated by CORSIA and RED. ISCC PLUS can be used to demonstrate sustainability in food or feed markets, for chemical or technical applications, and for bioenergy markets not regulated under CORSIA and the RED II (ISCC PLUS is for instance recognized by the Japanese Government for the verification certain sustainability parameters of imported biofuels). The verification of compliance with the ISCC requirements as well as the issuance of ISCC certificates are performed by recognised third party Certification Bodies (CBs) cooperating with ISCC.

During the development of its systems, ISCC takes into account and complements best practice initiatives like ISEAL Alliance and international standards like ISAE 3000³ and the International Organisation for Standardization (ISO). This facilitates and enables a consistent and reliable application of ISCC especially with respect to quality control, risk management, planning and conducting of audits, sampling processes, surveillance and reporting. ISCC strives for continuous improvement and assesses the system's effectiveness in regular impact assessments which are documented in impact reports. Furthermore, ISCC operates the ISCC Integrity Programme, which is a tool to continuously monitor and improve the performance of the ISCC System Users as well as the performance of the CBs cooperating with ISCC to ensure and maintain the high-quality standard of ISCC.

Best practices

2 Scope and Normative References

This document lays down the general principles according to which the ISCC systems are governed globally. It specifies the goal and internal structure of ISCC, as well as the relationship between ISCC and its stakeholders.

Global Application

The principles specified in this document have to be considered for all activities related to ISCC. They apply to ISCC as an organisation, to cooperating CBs, to ISCC System Users, and to other stakeholders of ISCC.

Scope of application

The general principles regarding the scope and governance of ISCC apply to both ISCC CORSIA and ISCC CORSIA PLUS. Therefore, as a basic principle, all references made to ISCC CORSIA in this document apply to ISCC CORSIA PLUS as well. Whenever requirements differ between the two systems, this is explicitly stated.

References

3 ISCC's Goal and Mission

ISCC's mission is to contribute to the mitigation of global warming through the reduction of GHG emissions as well as to advance, facilitate and incentivise the production, procurement, finance and use of sustainable products. ISCC

Promotion of sustainability

³ *International Standard on Assurance Engagements 3000: Assurance Engagements other than Audits or Reviews of Historical Financial Information.*

wants to contribute to and promote an environmentally, socially and economically sustainable production and use of bio-based and recycled raw materials, and of the products derived from such raw materials. Lastly, the protection of ecosystems, especially those that are carbon rich and biodiverse, lies at the core of ISCC.

In order to achieve this, ISCC has established global sustainability certification systems which cover the entire supply chain. It can be used to prove compliance with legal and voluntary sustainability requirements. The ISCC systems are feasible, reliable and trustworthy. They were established and are continuously reviewed and improved by means of a multi-stakeholder dialogue. Openness, reliability, consistency, integrity, quality and transparency are core features of the ISCC systems and are fundamental for ISCC's relationship with its stakeholders. The goal of ISCC is to contribute to enhancing and establishing sustainability certification in all markets and for all types of raw material.

*High-quality
certification
system*

The procedures and processes for the governance of ISCC which are specified in this document, are essential guidelines for ISCC.

*Essentials
guidelines for
ISCC*

4 CORSIA and Sustainable Aviation Fuels

ICAO and the aviation industry recognize the need to lower GHG emissions in order to protect the earth's climate and reduce global warming. With CORSIA, ICAO Member States agreed on the aspirational goal of carbon-neutral growth after 2020.

*Carbon-neutral
growth of the
aviation sector*

In the framework of CORSIA, airlines must measure the growth-related emissions of their fleet emitted during international flights between CORSIA-participating states and report the calculated values to their state. The reports are verified by independent third parties and the airlines are informed about the amount of emissions that they must offset. They can do so by purchasing emissions units generated by climate protection projects in carbon markets and by cancelling them within a registry in order to avoid double-counting. The year 2019⁴ will be used to establish a baseline for the aviation industry's emissions. With the start of the CORSIA programme, all the sector's emissions that exceed this baseline shall be offset.

*Emissions
offsetting*

SAF play an essential role in the CORSIA programme, as their use will help airlines to reduce their emissions and, hence, their offset requirements. However, not every SAF is eligible for claiming emissions reductions. Only the so-called CORSIA eligible fuels (CEF), which comply with the CORSIA sustainability requirements, are recognized. CORSIA sets additional rules for traceability, transparency, auditor competencies, record keeping and documentation. ISCC covers the complete set of CORSIA requirements,

*Sustainable
aviation fuels*

⁴ The ICAO Assembly reinforced its commitment to (CORSIA) and increased its ambition by agreeing to stabilize emissions of international aviation at 85% of the 2019 level.

allowing economic operators at every point in a SAF supply chain to show their compliance with the CORSIA scheme by becoming certified.⁵

5 ISCC: A Multi-Stakeholder Organisation

Stakeholders of ISCC are individuals or groups that have an interest in any ISCC decision or activity. Stakeholders of ISCC include all types of companies from all sectors and from across the entire supply chain that ISCC is active in, Non-Governmental Organisations (NGOs), scientific institutions, research and other organisations, representatives from the public sector or individuals who are involved with ISCC and who support its goals.

Definition stakeholder

The ISCC Association (ISCC e.V.) is the legally registered body responsible for governing ISCC, for guiding the strategic decisions taken by ISCC, and for unifying and representing ISCC's stakeholders. The ISCC Association guarantees adherence with the multi-stakeholder process. Natural or legal persons may become members of the ISCC Association if they share the same goal and mission as ISCC. Members can participate in the organisation and have a voting right.

ISCC Association

The General Assembly is the annual meeting of the members held by the ISCC Association. During the annual General Assembly, the members of the ISCC Association elect the Board of the ISCC Association (ISCC Board) and discuss and decide on strategically important matters. The ISCC Board represents the three different stakeholder groups participating in ISCC:

General Assembly and Stakeholders

- 1 Feedstock Producers and Processors
- 2 Trade, Logistics and other System Users
- 3 NGOs, Social Sector, Science and Research, Public Sector

The ISCC Board is made up of two representatives of each stakeholder group ensuring equal representation of interests. The ISCC Board may initiate and establish Stakeholder Committees to support ISCC in the handling of specific topics and to facilitate the regional stakeholder dialogue.

ISCC Board

The day-to-day operations, management and development of the ISCC system are assigned to the ISCC System GmbH (ISCC limited liability corporation).

Day-to-day operations

Stakeholders of ISCC either have the option to engage with ISCC by becoming members in the ISCC Association, by participating in Stakeholder Committees, the regional stakeholder dialogue, and Working Groups, or by giving feedback to the system through Public Consultation, or directly via email, over the telephone or in person. Membership in the ISCC Association is not a precondition for System Users to become certified or to engage in the stakeholder dialogue with ISCC.

Engaging with ISCC

⁵ See the five ICAO documents for COSIA eligible fuels as well as the ICAO Standards and Recommended Practices, Annex 16, Volume IV.

Stakeholder Committees

Stakeholder Committees are a valuable tool with which to engage with stakeholders from specific regions or with stakeholders interested in specific technical questions. Members of the ISCC Association, ISCC System Users, CBs cooperating with ISCC, and other stakeholders may participate in Stakeholder Committees. Within the framework of a Stakeholder Committee, Working Groups can be established to focus and work on specific topics or issues relevant for ISCC. The participants of a Working Group should have fundamental experience and expertise in the relevant topic being dealt with by the Working Group in order to support an effective and efficient working procedure. The main tasks of Stakeholder Committees are:

- > Organisation of stakeholder involvement and dialogue in a region or on a specific topic
- > Development of guidance on how to facilitate and improve the application of the ISCC system to regional or technical specifics and risks or to individual markets
- > Support of CBs with information about local or regional conditions, requirements and risks
- > Support of ISCC in the procedure of risk assessment and management in the regions and markets where ISCC is applied by System Users
- > Special consideration of the local and regional regulatory framework
- > Promotion of the ISCC system and facilitation of the ISCC goal
- > Mediation of local or regional conflicts.

The structure of the ISCC Association as well as the rights and duties of the involved parties are specified in the ISCC Document 101 “ISCC Statutes” and which is publicly available on the ISCC website.

ISCC statutes

Another important stakeholder group for ISCC are CBs who cooperate with ISCC as they are responsible for the consistent verification of compliance with the ISCC requirements. CBs cannot become members in the ISCC Association in order to avoid any potential conflicts of interest and to ensure their role as independent third parties. Nevertheless, CBs can participate in ISCC’s Stakeholder Committees, Working Groups and other ISCC events. Furthermore, ISCC organises regular meetings specifically convened for the representatives of recognised CBs cooperating with ISCC. The aim of those meetings is to exchange feedback and practical experiences in relation to the daily application of ISCC, to discuss best practices, to identify and reduce potential risks and to facilitate improvements of the system. This way CBs are included in the multi-stakeholder approach of ISCC and can support the implementation of best practices and the continuous improvement of ISCC.

Certification Bodies

Figure 1 provides an overview of the ISCC stakeholder dialogue and the responsibilities within ISCC.

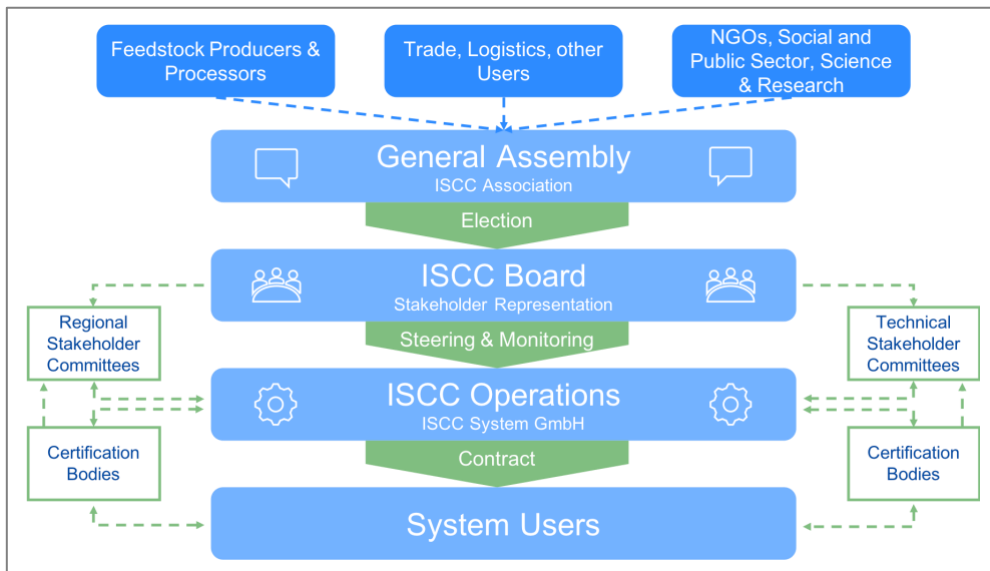


Figure 1: Interaction between Stakeholders, ISCC Association (ISCC e.V.) and ISCC System GmbH

6 System Documents, Updates and Public Consultation

The ISCC certification systems rely on governance documents which contain general requirements, processes and guidelines applicable to ISCC as a whole. They specify for instance the procedures for conflict resolution, dealing with non-conformities, the ISCC Impact Assessment, or the ISCC Integrity Programme. The governance documents are complemented by technical documents. The technical documents contain and establish the specific requirements for the sustainable production of feedstocks, for traceability and chain of custody, or for greenhouse gas calculation and verification. The requirements specified within the technical documents are the basis for a certification under ISCC and are to be complied with by ISCC System Users. Compliance with the respective ISCC requirements is verified during audits by CBs cooperating with ISCC.

Governance and technical documents

The system documents and the management system are reviewed regularly and changed in case circumstances require it. In the event of adjustments or changes to the content of one of the ISCC systems, ISCC incorporates the adjustments into the respective system documents and communicates the adjustments to all stakeholders via system updates. In the event of newly developed system documents or fundamental changes to existing system documents, ISCC will publish the respective documents on the ISCC website for Public Consultation in order to gather feedback from its stakeholders. The Public Consultation shall be sixty calendar days. If adjustments or changes to the system are required to ensure compliance with the CORSIA requirements and/or to maintain the recognition of ISCC by ICAO, feedback gathering and public consultation of stakeholders does not apply.

System updates and adjustment of documents

In case of adjustments or changes to the relevant content of ISCC CORSIA in the version recognised by ICAO, such adjustments or changes will be notified to ICAO. Only after approval by ICAO such adjustments or changes can be implemented. The same applies for changes to the ISCC EU documents, which are not subject to Public Consultation either and will only be implemented after approval by the European Commission.

Adjustments of recognised documents

After the Public Consultation, ISCC will analyse and consider the feedback received during the Public Consultation phase before publishing the final version of the document including the date on which it becomes valid. In the case of fundamental changes to existing system requirements, ISCC will allow for an appropriate transitional period to allow for all stakeholders to adapt to the adjustments or changes.

Incorporation of feedback from public consultations

In order to facilitate the carrying out of reliable and consistent audits, ISCC prescribes audit procedures to CBs which have to be used during the audits. The audit procedures are working documents or “checklists” containing the ISCC requirements laid down in the technical documents. ISCC uses the filled-in audit procedures to perform internal reviews and risk analyses, to gather relevant data to fulfil its reporting obligations, conducting the ISCC Impact Assessment and to evaluate the performance of CBs and auditors.

Audit procedures (checklists)

7 ICAO, Records, Reporting and Processes

In principle, ISCC works together with competent authorities so as to ensure compliance with legal requirements in the frameworks of the different ISCC schemes. ISCC will also provide any information required by the relevant national authority related to GHG reporting.

National authorities

The ICAO council is the competent authority to approve certification systems, which can be used to demonstrate compliance with the CORSIA requirements. The recognition of ISCC CORSIA by the ICAO council enables System Users to use the ISCC CORSIA certification system in order to demonstrate that consignments of aviation fuel comply with the respective requirements specified by the ICAO Council.

ICAO

ISCC collects and records relevant information and submits annually a report to ICAO that includes this information⁶. The records are kept for a minimum of ten years. In addition, ISCC records detailed information about the calculation of actual emissions values within the ISCC CORSIA system and provides this information to ICAO on request.⁷

Reporting to ICAO

ISCC cooperates with independent third-party CBs that are responsible to conduct audits and issue ISCC certificates to System Users after compliance with the respective ISCC requirements has been demonstrated during the

Certification Bodies

⁶ In line with the requirements specified in the ICAO document “CORSIA Eligibility Framework and Requirements for Sustainability Certification Schemes”.

⁷ In line with the ICAO document “CORSIA Methodology for Calculating Actual Life Cycle Emissions Values”.

audit. CBs may conduct audits according to ISCC CORSIA if an accreditation body accredits them. The respective body responsible for the accreditation of a CB is also responsible for the monitoring and surveillance of the CB. The monitoring and surveillance of the CBs is supported by ISCC through the ISCC Integrity Programme. Furthermore, ISCC closely cooperates with the CBs, e.g. in the form of regular meetings held to exchange feedback and practical experiences with the aim of continuously improving ISCC. CBs must comply with the requirements specified in ISCC CORSIA Document 103 “Requirements for Certification Bodies and Auditors”.

ISCC System Users are organisations (natural or legal persons) that conclude a contract and register one or more operational units with ISCC to become certified and thus “use” the ISCC system to demonstrate sustainability of a raw material or product. A competent and ISCC trained auditor working with a recognised CB assesses and evaluates the compliance of the System User with the relevant ISCC requirements during an audit at the System Users premises. If compliance has been demonstrated, the CB issues an ISCC certificate to the System User.

ISCC System Users

ISCC receives all certificates issued by cooperating CBs and publishes them on the ISCC website. Customers of ISCC System Users or other interested third parties can verify via the ISCC website if a company or supplier holds a valid ISCC certificate and thus is eligible to make a sustainability claim according to ISCC.

Publishing of certificates

Figure 2 provides an overview of the relevant elements in the ISCC CORSIA System.

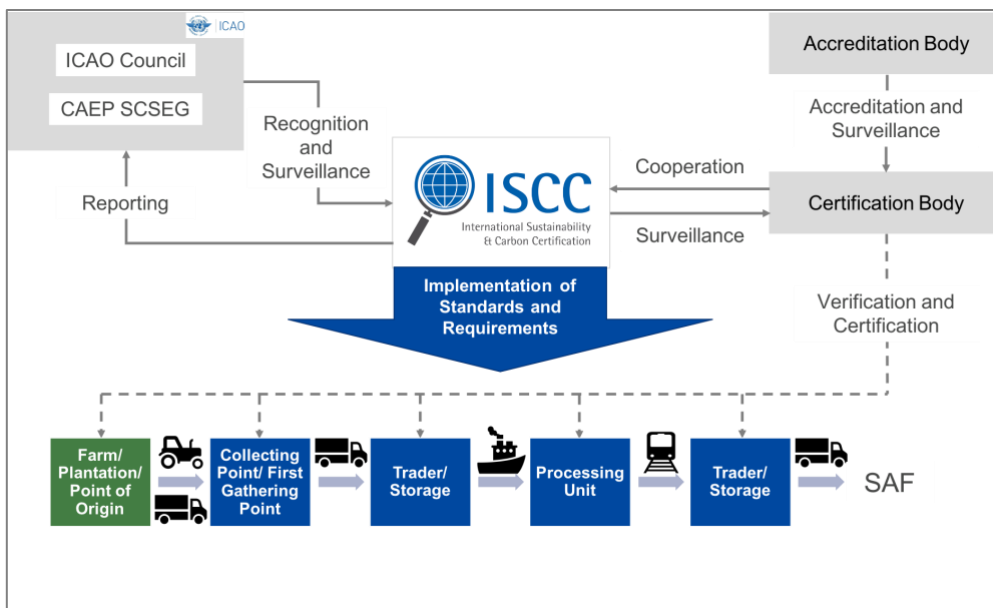


Figure 2: The processes and elements of ISCC CORSIA at a glance

8 Transparency

Transparent provision of information is a precondition for ISCC to offer a high-level sustainability certification system that is feasible, secure and credible. ISCC publishes relevant information about the ISCC system freely accessible on the ISCC website. Publicly available information about ISCC explicitly includes, but is not limited to:

ISCC website

- > The ISCC system documents, including the governance structure, fees and the ISCC Terms of Use, and the guidelines for audits (audit procedures), in the latest applicable version;
- > Instructions for System Users how to participate in the system;
- > Contact details of ISCC and options to contact ISCC directly;
- > Options for stakeholders to give feedback about the standard and developments of the standard (Public Consultation);
- > Documentation of ISCC stakeholder meetings and other events including the annual ISCC Global Sustainability Conference;
- > Documentation of ISCC participation in external events;
- > Announcement of all ISCC Trainings and events;
- > A list of all recognised CBs cooperating with ISCC and the respective bodies responsible for accreditation or recognition of the CBs;
- > A list of certified ISCC System Users, the scope of certification and information about the status of the certification (e.g. validity period, information about withdrawn certificates or suspensions, etc.);
- > A list of ISCC System Users being excluded due to serious non-compliances with ISCC and the period of exclusion (“blacklist”);
- > Regular newsletters informing all stakeholders about the latest ISCC activities and opportunities to get involved with ISCC;
- > The names of any other eligible certification schemes that ISCC recognises within its systems.

9 Quality and Risk Management

ISCC is committed to a continuous improvement of the ISCC CORSIA system. The quality and risk management in the framework of ISCC CORSIA contributes to such a continuous improvement process. It aims for consistency in all activities related to ISCC CORSIA, especially with regards to the practical implementation and the secure and credible verification of compliance with the ISCC CORSIA system. The principles for quality management apply to the ISCC management and all of ISCC’s operations. Core features of the quality and risk management within ISCC CORSIA are:

*Continuous
improvement
process*

- > The ISCC Integrity Programme: Ensures a consistent and objective audit and certification process by CBs cooperating with ISCC worldwide. It enables closer monitoring of the CBs' verification activities and is based on an ongoing assessment process that is part of the continuous improvement of the ISCC system. It consists of ISCC System User assessments and assessments of CB head offices planned randomly or on a targeted basis e.g. after risk evaluations or complaints. The assessments are conducted by ISCC experts (integrity auditors) and can cover all the countries where the CB carries out ISCC activities.

Integrity Program
- > Benchmarking processes: ISCC regularly participates in benchmarking processes comparing different systems for sustainability certification. ISCC uses the results of those processes and the feedback provided to learn and improve continuously.

Benchmarks
- > ISCC multi-stakeholder dialogue: The development of ISCC is based on an open multi-stakeholder process. Aspects of the multi-stakeholder dialogue include the ISCC Association, regular Stakeholder Committees and meetings with cooperating CBs. The extensive stakeholder dialogue under ISCC enables the identification, evaluation and implementation of stakeholder requirements and of regional specifics and risk prevention measures.

Stakeholder dialogues
- > Regular participation in sustainability conferences: ISCC participates in international conferences. In addition, ISCC is organising the annual "ISCC Global Sustainability Conference". At the conferences ISCC and its latest development are being presented. During conferences ISCC also receives valuable feedback being relevant for a continuous improvement of the system.

Sustainability conferences
- > ISCC Training Program: ISCC has developed a specific training program for auditors, CBs, System Users and other interested stakeholders covering different topics of ISCC. On a regular basis ISCC offers trainings in different countries. The following training modules have been developed: ISCC Basic Training, GHG, Plantation and Land Use Change, Waste and Residues, ISCC PLUS, ISCC CORSIA. The requirements. The training is used to guarantee consistent audit processes, to update participants on latest requirements and also to receive feedback and provide opportunities for discussions.

ISCC Trainings
- > Requirements for CBs and feedback mechanisms: CBs cooperating with ISCC must have an adequate quality management system in place, reflecting the relevant aspects of ISCC CORSIA appropriately. The specific requirements for CBs are specified in the ISCC CORSIA Document 103 "Requirements for Certification Bodies and Auditors". ISCC organises regular meetings with representatives of the recognised CBs. The aim of those meetings is to exchange practical

Feedback from CBs

feedback and experiences from the application of ISCC, to discuss best practices, to identify potential risks to the system and to facilitate improvements of the system. In addition, CBs regularly participate in ISCC stakeholder events and provide feedback to ISCC directly via email and phone. The CBs cooperating with ISCC annually provide a report to ISCC regarding important non-conformities, corrective actions and risks, which have been detected during the audits and activities over the previous year. The results of both, the regular meetings with the CBs and the annual reports will be evaluated by ISCC. If required, ISCC provides additional guidance to all CBs to ensure a level playing field. The audit procedures themselves provide information and verification guidance to facilitate a consistent performance of ISCC CORSIA audits.

- > Discussions with authorities: ISCC is a reliable partner for the competent legislative bodies and offers an instrument which ensures compliance with the legal requirements for the sustainability of feedstocks and fuels in different countries around the world. Dialogue and discussions with the authorities provide feedback and valuable information which are also used for continuously improving the system. *Legislative bodies and authorities*
- > Quality management by System Users: System Users must comply with the principles for quality management and should aim for a continuous improvement of the processes related to ISCC CORSIA. This means that all relevant processes of the System User, which are related to ISCC CORSIA, should be integrated appropriately into the System Users quality management system. This includes in particular the identification and documentation of relevant processes and responsibilities and training and qualification of relevant employees implementing ISCC CORSIA or handling sustainable material. *Continuous improvement*
- > Customer and stakeholder service: System Users and stakeholders of ISCC can always contact and engage with ISCC directly via email or telephone (“ISCC hotline”) to submit questions, concerns and general feedback. Customer focus and prompt feedback are core features under ISCC. *Customer service*

The quality management of ISCC is based on the general elements that would constitute any quality management system (see figure 3). *Quality management of ISCC*

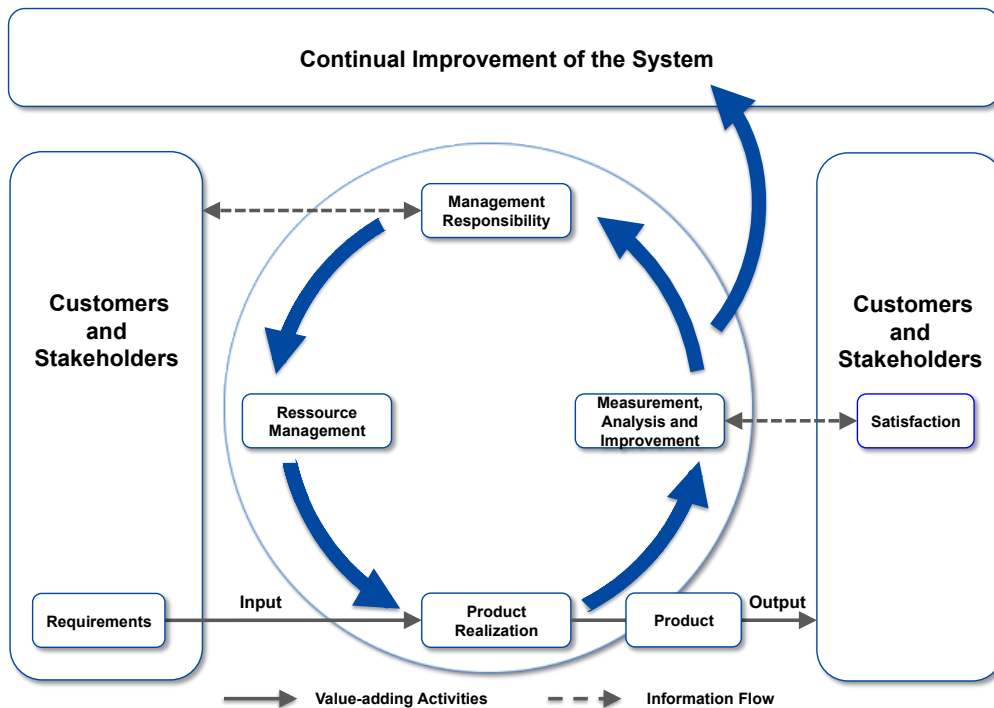


Figure 3: Model of a process-based quality management system (according to ISO 9001)

Risk management is an integral part of the quality management of the ISCC system and a component of all decision-making processes within ISCC. ISCC defines a procedure and specific indicators for risk assessment and management to ensure compliance with the requirements of the certification system with high levels of credibility and reliability. This procedure is an integral part of all operations and decisions in the ISCC system applicable to ISCC, the recognised CBs and ISCC's System Users. The procedure is specified in ISCC CORSIA Document 204 "Audit Requirements and Risk Management".

*Risk
management*

All institutions of the ISCC system are committed to clear quality policies as guidelines for daily operations. These guidelines are the basis for a successful implementation and performance of the certification system. The guidelines of ISCC are described in Annex 1.

*Quality
guidelines*

10 Conflict Resolution

10.1 General Provisions and Definitions

ISCC has established a conflict resolution process to ensure that conflicts are handled in a consistent, impartial, nondiscriminatory, user friendly, timely and effective manner. The conflict resolution process aims to ensure the integrity and reliability of the ISCC Certification Systems.

*Transparent and
impartial*

Conflicts should always be resolved at the lowest possible level and with direct participation of the parties involved in and affected by the conflict. Prior to

initiating the ISCC conflict resolution process, affected parties should seek to resolve the conflict through direct dialogue. If dialogue between the parties involved does not resolve the conflict, the conflict resolution process as specified in this chapter can be instigated.

Conflicts can occur on different levels, respectively between different stakeholders, organisations or individuals in relation to ISCC's procedures:

Types and levels of conflicts

- > Conflicts between a CB and a System User (e.g. regarding findings during audits and certification decisions)
- > Conflicts between ISCC and CBs or System Users (e.g. regarding decisions made by ISCC in the framework of the ISCC Integrity Programme)
- > Conflicts regarding activities of System Users or CBs affecting local or regional stakeholders, including alleged non-conformities with ISCC requirements of System Users or CBs

ISCC's conflict resolution process consists of the two levels complaints and appeals. A complaint describes an expression of dissatisfaction with decisions or other activities of ISCC or an indication of non-compliance of System Users and CBs or other persons involved in an ISCC certification system with ISCC requirements or of a failure to follow ISCC policies and operating procedures. An appeal is a request for reconsideration of a decision made by ISCC based on a complaint.

Complaints and appeals

If the complainant wishes to remain anonymous throughout the entire conflict resolution process, the complainant must request this when submitting the complaint and must give a good reason for this. If anonymity is granted by ISCC, all parties involved in the conflict resolution process will ensure that the identity of the complainant will not be disclosed throughout the process.

Anonymous complaint possible

Except from legal obligations to disclose information to authorities or courts, ISCC will not share any specific information regarding a conflict with any party not involved in the conflict resolution process while the investigation is ongoing.

No disclosure during process

10.2 Complaints

Complaints can be filed with ISCC by any party (individuals or organisations) that is affected by activities or decisions of ISCC or has a material interest in the activities of ISCC such as System Users and their employees, Certification Bodies and their employees, auditors and third interested parties (e.g. competent authorities, NGOs, community groups and other stakeholders).

Eligible parties for filing complaints

The ISCC management decides on the admissibility of complaints based on the formal requirements specified below.

Formal requirements

Complaints must:

- > Be addressed to ISCC management

- > Be submitted in written form (preferably by using the complaint form on the ISCC website but also by email or mail)
- > Contain basic information about the complainant (name, address, contact information) and, if applicable, the organisation and position in the organisation
- > Contain a clear and brief description of the complaint, including the relevant circumstances and stakeholders/parties affected in a way that any impartial person or party can obtain a clear idea and an unambiguous understanding of the situation at hand
- > Be accompanied to the extent possible by evidence supporting the complaint

The complainant will be informed in writing without delay about the receipt of their complaint. ISCC management will decide if the complaint is admissible within 10 working days upon receipt of the complaint.

*Incoming
complaints*

Complaints are considered inadmissible if:

- > The above stated requirements regarding form and content are not met
- > The complaint is not substantiated or is negligible; complaints against sanctions which have been imposed by ISCC in the framework of the ISCC Integrity Programme are regarded as not substantiated, if the sanctions are based on the violation of unambiguous ISCC requirements and are supported by unambiguous evidence
- > The complaint is not sufficiently supported by objective evidence in order to be able to obtain a clear idea and unambiguous understanding of the situation at hand, or is based on hearsay alone
- > The complaint aims for adjustments of the recognised ISCC standards; comments and feedback regarding the published and recognised ISCC Documents should not be addressed as complaint but can be made through the public consultation process or can be provided to ISCC by email or mail
- > The complaint aims to have sanctions amended which have been imposed by the CB due to non-conformities detected; such complaints have to be addressed to the CB
- > The complaint aims to have sanctions amended which have been imposed by ISCC due to fraudulent behaviour
- > The events on which the complaint is based occurred more than 18 months ago

*Inadmissible
complaints*

- > The reason for the complaint does not explicitly relate to ISCC or to activities conducted within the framework of ISCC

Each accepted complaint will receive a unique reference number by which the complaint is registered within ISCC and which will be included in each communication regarding the complaint. Accepted complaints will be analysed, investigated and decided on impartially and unbiased by ISCC management on a case-by-case basis. In the course of investigating the reason for the complaint, ISCC is entitled to contact the parties and stakeholders affected and to ask for supporting evidence, documentation or statements in order to attain a sufficient understanding of the situation and to ensure that all parties involved can explain their position regarding the complaint. ISCC is also entitled to schedule an independent assessment in the framework of the ISCC Integrity Programme to gather further evidence. ISCC will react to any information and evidence received within 10 working days of receipt. Any result and decision will be communicated to the complainant by the ISCC management without delay. Based on the decision or any evidence received during the analysis of the complaint, ISCC is entitled to make provisions for certification audits or request that the CB conducts surveillance audits of the affected System Users. The handling of non-conformities and respective sanctions is described in chapter 11.

*Complaint
process*

10.3 Appeals

If the complainant does not accept ISCC's decision on the complaint and the complaint is not considered inadmissible, the complainant can file an appeal against this decision. Appeals must be filed in writing within 10 working days of the complainant receiving the decision from ISCC management. The complainant will be informed in writing without delay about the receipt of their appeal by ISCC.

Filing an appeal

ISCC will re-evaluate the complaint within 10 working days after receipt of the appeal, or, if additional evidence is requested from the complainant, within 10 working days after ISCC has received the relevant evidence. If the re-evaluation leads to a different decision ISCC will adjust its decision and communicate the adjusted decision.

*Re-evaluation of
the complaint*

If the re-evaluation does not lead to a different decision or if the adjusted decision does not fully remedy the complaint, ISCC will, upon request of the appellant, establish an Arbitration Board and transfer the issue to the Arbitration Board for final decision.

Arbitration Board

With the request to transfer the issue to the Arbitration Board the appellant will have to agree and to sign an arbitration agreement that the dispute will be finally settled by the Arbitration Board according to the ISCC Rules of Arbitration to the exclusion of the ordinary course of law. The ISCC Arbitration

*Arbitration
agreement*

Rules are based on the rules of a recognised institution⁸ and are adapted to ISCC requirements.

With the request for arbitration the appellant will have to provide a deposit. ISCC will determine the amount of the deposit on a case-by-case basis dependent on the expected costs of the arbitration procedure (e.g. cost of the Arbitration Board, expert or legal opinion, site reviews). The deposit is to be paid into an escrow account designated by ISCC. The costs of the arbitration procedure will be shared between ISCC and the appellant according to the degree of victory. The decision on costs is made by the Arbitration Board with the final decision.

Deposit required

The Arbitration Board consists of three arbitrators who represent the three stakeholder groups that constitute the ISCC Board. When arbitration is requested, ISCC shall provide a list of possible arbitrators from these groups. The appellant and ISCC shall each bindingly select one arbitrator from this list. The selected arbitrators will select the third arbitrator from the list so that all stakeholder groups are represented. The arbitrators must be free of all conflicts of interest with respect to the appeal and its subject matter and must not have been involved in the matter before. The seat of the arbitration will be Cologne, Germany. The language of the arbitration shall be English. The law applicable to the merits shall be German law.

Arbitrators

The Arbitration Board shall hear the parties involved before deciding. The results of the hearing shall be documented. The Arbitration Board shall take all necessary measures to come to a fast, fair and well-reasoned decision including commissioning independent experts or legal advice. If the involved parties doubt the neutrality or qualification of experts, these doubts shall be submitted to the Arbitration Board before its final decision. The Arbitration Board may decide to substitute the expert.

Arbitration process

The decision of the Arbitration Board shall be made within 6 months of receipt of all relevant information or evidence. If the Arbitration Board needs additional evidence, it should request this evidence within 2 months after receipt of evidence submitted so far. The decision of the Arbitration Board requires a simple majority. The minutes of the meetings must be prepared and documented by the Arbitration Board. The decision of the Arbitration Board must be documented in a report that is then to be submitted to the ISCC Board and the ISCC management which submits it to the parties involved.

Binding decisions

In case the Committee on Aviation Environmental Protection (CAEP) Sustainability Certification Schemes Evaluation Group (SCSEG) requests information on the complaints received or the complaints procedure, ISCC will provide all required information in a timely manner. Furthermore, in particularly severe cases ISCC will proactively inform ICAO in a timely manner.

⁸ Examples include the International Chamber of Commerce, located in Paris, and the German Arbitration Institute (DIS), located in Cologne.

11 Non-conformity and Sanctions

11.1 General Provisions

Non-conformity means the non-fulfilment or violation of an ISCC requirement either by a CB or by a System User.

Definition

An ISCC certificate can only be issued if there are no non-conformities at the time of issuance and all prior existing non-conformities are resolved. All required evidence to prove conformity or removal of prior non-conformity respectively must be made available to the CB at the latest 40 days after the date on which the audit was conducted. If not, compliance must be verified through an additional audit, and the certificate can only be issued after this audit.

Corrective measures are possible

Non-conformities with ISCC requirements are classified according to the impact of the non-conformity and the fault of the responsible actor (System User or CB). The impact of a non-conformity is severe if the non-conformity:

Severity of non-conformities

- > Has led to any kind of raw material, intermediate product or final product declared as sustainable that does not meet the ISCC requirements entering the downstream supply chain or being placed on the market, or
- > Has had, has or may have an adverse impact on the reliability, integrity, recognition by ICAO, functioning or performance of the ISCC Certification Systems (e.g. loss of confidence of market participants in the certification systems, restriction or withdrawal of the recognition by ICAO)

Categories of non-conformities are:

Categories of non-conformities

- > Minor non-conformities: They have no severe impact and can be corrected or have been corrected after detection. If such non-conformities are repeated after they have been detected, they may not be considered minor
- > Major non-conformities: They (1) have a severe impact or have a severe impact but are not minor and (2) are not critical. They cannot always be corrected after detection. If minor non-conformities are repeated after they have been detected, they may be considered as major
- > Critical non-conformities: They have a severe impact, are systematic, or intentional, for example fraud. If major non-conformities are repeated after they have been detected, they may be considered as critical as this is an indicator for systematic non-conformities

Based on this classification the CB assesses non-conformities of System Users as minor, major or critical (see chapter 11.2 for example of non-conformities) and applies the respective sanctions and measures as

Classification and assessment

described in chapter 11.2. In the framework of the Integrity Programme ISCC applies this classification to assess non-conformities of System Users or CBs as minor, major or critical and applies the respective sanctions and measures as described in chapters 11.2, 11.3 and 12. If required, ISCC is responsible for assessing the degree of negligence (ordinary or gross negligence) of the actor. ISCC takes the necessary measures to establish the facts needed for its assessments. CBs and/or System Users are obliged to cooperate with and support ISCC in such measures. In particular, ISCC is entitled to demand explanations, statements and the submission of documents and other evidence from CBs and System Users regarding the non-conformity and its circumstances. To establish the facts, ISCC is also entitled to conduct Integrity Assessments. If the responsible actor notifies the CB or ISCC proactively and in time of a committed non-conformity, this can be taken into account as a mitigating circumstance in the assessment. If the non-conformity has been revealed during or as result of an audit or an Integrity Assessment the respective communication cannot be regarded as proactive and timely notification.

Breaches of contract are found to be the case when a CB or a System User does not act according to contractual agreements between the CB and ISCC or the System User and ISCC. Contractual non-conformities may include but are not limited to non-fulfilment of payment obligations, misleading or false information or communication (e.g. information required to establish relevant fees). In the event of contractual breaches, ISCC is entitled to suspend the services offered by ISCC. This includes customer service via telephone or email and the participation in ISCC events. ISCC may also not accept new registrations for additional sites of a System User with contractual breaches.

Breaches of contract

11.2 System Users

11.2.1 Non-Conformities and Sanctions of System Users

If minor, major or critical non-conformities are found with a System User, for example during an audit, the CB and ISCC shall impose specific measures and sanctions as described in the following.

Minor non-conformities of System Users include but are not limited to:

- > The lack of documentation and information requirements without severe impacts (e.g. regarding company internal administrative processes, internal trainings or internal audits)
- > Insufficient implementation of ISCC requirements into the management system without severe impacts (e.g. regarding company internal organisational charts)

Minor non-conformities

Minor non-conformities must be corrected by implementing appropriate corrective measures within a time frame specified by the CB up to a maximum of 12 months or until the next audit (surveillance or recertification audit). The corrections must be verified by the CB during the next audit at the latest. In

Sanctions in case of minor non-conformities

addition, ISCC may issue a warning to the System User. A warning may be accompanied by reasonable measures (e.g. additional training for employees at critical control points) to ensure future compliance with the ISCC requirements.

Major non-conformities of System Users include but are not limited to:

Major non-conformities

- > Issuance of Sustainability Declarations or Proofs of Sustainability according to ISCC CORSIA System Document 203 for material despite no valid certificate being available at the time of dispatch of the sustainable material (physical delivery). In the case of a paper trader issuing of a Sustainability Declaration or Proof of Sustainability despite no valid certificate being available at the time of issuance
- > Selling one batch of sustainable material multiple times (multiple accounting)
- > Accounting or declaring biomass or other materials or products as sustainable, although the sustainability of the material or product cannot be fully traced, verified or validated (e.g. due to missing, incomplete or incorrect self-declarations, sustainability declarations and/or mass balance calculations or negative mass balances)
- > Major non-conformities on farm or plantation level, laid down in ISCC CORSIA System Document 202
- > False declaration or relabeling of material or products, especially in the case of waste and residues
- > Provision of false life cycle emissions information, in particular actual life cycle emissions values, to recipients of sustainable material
- > Claiming the amount or the sustainability characteristics (e.g. the GHG savings) of a batch of sustainable material multiple times, for example, in different States or under different regimes that cover the same sustainability characteristics (e.g. GHG savings or renewability)
- > Making false claims with a direct reference to ISCC or using the ISCC logo without the consent of ISCC (violation of the guidelines stated in ISCC System Document 208 "Logos and Claims")
- > Non-compliance with the ICAO CORSIA reporting requirements for CORSIA certified economic operators

In case of major non-conformities by System Users the issuing CB must suspend the validity of the certificate (suspension) with immediate effect for a period of 40 days. Within this period all non-conformities must be corrected by implementing appropriate corrective measures as determined by the CB. The

Sanctions in case of for major non-conformities

CB shall end the suspension within or after this period if it confirms the successful implementation of the corrective measures. If corrective measures cannot be implemented within this period for exceptional reasons the suspension can be extended up to 30 days with the consent of ISCC. If not all major non-conformities are corrected within the period of suspension the CB has to declare the certificate invalid and withdraw the certificate with immediate effect. The CB has to inform ISCC immediately about any suspension, its intended extension, its end or a withdrawal of a certificate. In case of withdrawal ISCC may exclude the System User from recertification (exclusion) for up to 6 months in case of ordinary negligence of the System User with regard to the non-conformity and for up to 12 months in case of gross negligence.

Critical non-conformities of System Users include but are not limited to:

- > Any violation of requirements covering the approved CORSIA sustainability criteria
- > Violations of the requirements of ISCC Principle 1
- > Intentional violations of ISCC requirements, including fraud
- > Modification of production processes to deliberately generate waste or residues
- > Deliberate contaminations of materials to generate waste or residues
- > Intentional false declaration of waste or residues
- > Missing or delayed cooperation in the ISCC Integrity Programme or in surveillance audits ordered by the CB and/or by ISCC

Critical non-conformities

In the case of critical non-conformities, the issuing CB must declare the certificate invalid and withdraw it with immediate effect and must inform ISCC immediately. ISCC may exclude the System User from recertification with ISCC for a period of up to 60 months.

Sanctions in case of critical non-conformities

In case of suspension or withdrawal of a certificate, ISCC will immediately update the status of the certificate on the ISCC website accordingly. Exclusions from recertification and their duration are also published on the ISCC website. ISCC will not publish specific reasons for the suspension and withdrawal of a certificate or the exclusion of System Users.

Publishing on ISCC website

ISCC is entitled to notify authorities, other certification systems and CBs about the suspension and withdrawal of certificates as well as the exclusion of System Users.

Communication to third parties

If any non-conformities are detected with a System User, ISCC and the CB are entitled to impose conditions for the recertification of the System User which are suitable for preventing future non-conformities and for ensuring future compliance with ISCC requirements. This also applies if certificates were suspended or withdrawn or if the economic operator was excluded from

Recertification and conditions for recertification

recertification. Examples for conditions are the application of a higher risk level for audits, the obligation of additional surveillance audits after a specified period of time, the submission of specified documents (e.g. Sustainability Declarations) to the CB and/or ISCC for a specified period of time (e.g. one mass balance period), or the obligation of trainings for relevant members of staff. Unless the System User is excluded from recertification immediate recertification is possible after the withdrawal of a certificate. For this, the System User has to pass a certification audit successfully.

During the time of a suspension of the certificate or the exclusion from certification the (former) System User is not allowed to handle material declared as sustainable under ISCC or to use the ISCC logo or make any claims referring to an ISCC certification or ISCC certified material (see ISCC System Document 208 “Logos and Claims”). This implies that the (former) System User is not permitted to act for other ISCC certified System Users, e.g. as dependent collecting point or dependent storage facility for a certified System User. ISCC certified Systems Users cannot accept deliveries as sustainable from an economic operator that is certified under another certification scheme accepted under ISCC if this economic operator is excluded from ISCC certification. Certified ISCC System Users are obligated to ensure that all service providers, such as dependent collecting points and storage facilities, comply with the ISCC requirements.

No handling of sustainable material

Table 1 provides a simplified overview of non-compliances and possible sanctions for System Users.

Details on non-conformities

Severity Degree of negligence	Minor	Major	Critical
Ordinary negligence	Warning Conditions	Suspension or withdrawal of certificate Exclusion from recertification possible for up to 6 months	Not applicable
Gross negligence	Warning Conditions	Suspension or withdrawal of certificate Exclusion from recertification possible for up to 12 months	Not applicable
Intentional/ Fraud	Not applicable	Not applicable	Withdrawal of certificate Exclusion from recertification up to 60 months

Table 1: Overview of Non-conformities and Sanctions for System Users

11.2.2 Fraud Investigations or Suspicion of Non-Conformities

ISCC System Users are obliged to immediately inform their CB and ISCC in text form (email or mail) if they or their operations related to ISCC in any way are subject to fraud investigations by competent authorities.

Immediate information

If ISCC learns that a System User is subject to a fraud investigation, or if ISCC receives substantiated information that gives rise to the suspicion of a severe non-conformity (major or critical non-conformity) or fraud, ISCC shall request a statement from the System User regarding the investigations and/or these suspicions. The System User has to submit a substantiated statement refuting all suspicions of non-conformity and fraud and explaining the reasons for the investigations within three working days.

Statement requested

Otherwise, and if ISCC comes to the conclusion that there is a well-founded and urgent suspicion of a severe non-conformity or of fraud involving the violation of ISCC requirements, the CB must suspend the validity of the certificate with immediate effect for a period of 40 days. The CB shall end the suspension in consent with ISCC within or after this period if compliance with the ISCC requirements can be demonstrated or if the suspicion is otherwise cleared or the investigations are terminated. The CB shall extend in consent with ISCC this period if compliance with the ISCC requirements cannot be demonstrated or the suspicion is otherwise still pending, or the investigations are continued.

Suspension of certificate possible

ISCC may conduct an assessment of the System User in the framework of the ISCC Integrity Programme or request the issuing CB to conduct an audit of the System User. In case of findings the sanctions as described in chapter 11 or in chapter 12 (for ISCC Integrity Assessments) apply.

Audit of System User

11.3 Certification Bodies

In the event of non-compliant behaviour of a CB, its auditors or representatives, ISCC may impose sanctions against the CB or the individuals responsible for the non-conformity. ISCC assesses the type and level of non-conformity and determines the level of sanction on a case-by-case basis. The principles specified in chapter 11.1 shall be applied.

Case-by-case assessment

There are four levels of sanctioning: Warning, Yellow Card, Red Card, and Contract Cancellation. Furthermore, ISCC reserves the right to impose a contractual penalty if there is a violation against the ISCC requirements.

Sanctions of CBs

In addition, ISCC is also entitled to impose measures which are suitable for preventing future non-conformities or for ensuring future compliance of the CB with ISCC requirements. Examples for measures include additional training of auditors and/or members of staff, specific measures for auditors for a specified period of time (e.g. audits can only be conducted when if accompanied by other auditors or the suspension from conducting ISCC audits). ISCC is entitled to set a time frame for the implementation of the measures by the CB. The CB has to provide evidence to ISCC that the measures have been implemented within the set time.

Measures for CBs

Level 1: Warning

ISCC may issue a Warning if minor non-conformities with ISCC requirements are detected (e.g. in the framework of the ISCC Integrity Programme). Examples of minor non-conformities include but are not limited to:

Minor non-conformity

- > Certification documents submitted to ISCC are delayed or incomplete
- > Delayed notification to ISCC about suspended or withdrawn certificates
- > Missing or delayed notification to ISCC about failed audits
- > Missing notification to ISCC about the change of CB of a System User (i.e. when a System User contracts a new CB for the recertification audit)
- > Incorrect determination of the sample size for audits (if applicable)
- > Conditions for the certification of a System User imposed by ISCC were not taken into account during the audit
- > CB did not detect minor non-conformities of a System User (see chapter 11.2) although the non-conformity should have been detected during the audit

Only the CB will be informed about the Warning. After a Warning the CB must submit a statement of explanation to ISCC within two weeks upon notification of the Warning. This statement has to include a description of suitable measures taken by the CB for preventing future non-conformities or for ensuring future compliance with ISCC requirements.

Sanctions and measures

Level 2: Yellow Card

ISCC may issue a Yellow Card in case of repeated or systematic minor non-conformities, especially if ISCC has already issued a Warning to the CB before regarding the same type of non-compliance. A Yellow Card can also be issued in case of major non-conformities (e.g. in the framework of the ISCC Integrity Programme) or if the CB does not react to or does not report in response to written requests for, e.g. evidence or statements by ISCC. Examples of major non-conformities include but are not limited to:

Repeated minor non-conformities or major non-conformities

- > CB did not detect major non-conformities of a System User (see chapter 11.2) although the non-conformity should have been detected during the audit
- > Certificates are not issued according to the ISCC requirements (e.g. one certificate issued for more than one System User)

ISCC shall inform the accreditation body or respective national authority that has accredited or recognised the CB and is responsible for monitoring the CB of the Yellow Card and the circumstances that led to the Yellow Card. The CB shall submit a statement of explanation to ISCC within two weeks upon notification of the Yellow Card. This statement has to include a description of suitable measures taken by the CB for preventing future non-conformities or for ensuring future compliance with ISCC requirements. ISCC is entitled to impose further measures that have to be implemented by the CB within a set time frame.

Sanction and measures

Level 3: Red Card

ISCC may issue a Red Card in case of critical non-conformities with ISCC requirements (e.g. in the framework of the ISCC Integrity Programme), or if measures required due to a Yellow Card have not been completely implemented within a set time, or if the CB does not react to or report on repeated written requests for, e.g. evidence or statements by ISCC, or if the accreditation body or competent national public authority has suspended the accreditation or recognition of the CB.

Critical non-conformities

Examples of critical non-conformities include but are not limited to:

- > CB did not detect critical non-conformities of a System User (see chapter 11.2) although the non-conformity should have been detected during the audit
- > Missing or delayed cooperation in the ISCC Integrity Programme

The initial Red Card can have a duration of up to 6 months in case of ordinary negligence of the CB with regard to the non-conformity and of up to 12 months in case of gross negligence. If the circumstances that lead to the issuance of a Red Card are detected again within the period of the initially issued Red Card this leads to enhanced sanctions and measures.

Sanction and measures:

Sanctions and measures

Initially issued Red Card:

- > ISCC shall inform the accreditation body or respective national authority that has accredited or recognised the CB and is responsible for monitoring the CB of the Red Card and the circumstances that led to the Red Card
- > ISCC shall publish the issuance of the Red Card, including the duration of the Red Card on the ISCC Website
- > The CB is not permitted to issue certificates to new clients for the duration of the Red Card (i.e. System Users that were not clients of the CB prior to the date the Red Card was issued)

First extension: In case of repeated detection of circumstances that lead to a Red Card within the period of the initially issued Red Card:

- > The duration of the Red Card is extended by 12 months
- > ISCC shall inform the accreditation body or respective national authority that has accredited or recognised the CB and is responsible for monitoring the CB of the extension of the Red Card and the circumstances that led to the extension
- > ISCC shall publish the extension of the Red Card on the ISCC website

- > The CB is not permitted to issue certificates to new clients for additional 12 months (i.e. System Users that were not clients of the CB prior to the date the Red Card was issued), and the CB is not permitted to issue certificates to existing clients for a period of 6 months (i.e. System Users that were clients of the CB prior to the date of the Red Card)

Second extension: In case of repeated detection of circumstances that lead to a Red Card within the extension period of the Red Card:

- > The duration of the Red Card is extended by another 12 months
- > ISCC shall inform the accreditation body or respective national authority that has accredited or recognised the CB and is responsible for monitoring the CB of the further extension of the Red Card and the circumstances that led to the further extension
- > ISCC shall publish the further extension of the Red Card on the ISCC website
- > The CB is not permitted to issue certificates for a period of 12 months to new clients (i.e. System Users that were not clients of the CB prior to the date the Red Card was issued), and the CB is not permitted to issue certificates for a period of 12 months to existing clients (i.e. System Users that were clients of the CB prior to the date of the Red Card)

Level 4: Contract Cancellation

In cases of verified fraud or if a Red Card could not be lifted after the second extension, or in cases of bankruptcy or loss of the required recognition or accreditation of the CB by a national authority or accreditation body ISCC may terminate the cooperation agreement with the CB.

Termination of cooperation

Sanction:

- > ISCC shall inform the accreditation body or respective national authority that has accredited or recognised the CB and is responsible for monitoring the CB of the contract cancellation and the circumstances that led to the contract cancellation
- > Cancellation of the contract is made public on the ISCC Website and all ISCC System Users are to be informed
- > The CB is not allowed to issue ISCC certificates
- > Cancellation of the cooperation agreement by ISCC.

12 ISCC Integrity Programme

12.1 Overview

The ISCC Integrity Programme was launched as a tool to enable closer monitoring of the CBs' verification activities and companies' compliance and is based on an ongoing assessment process. It aims to ensure a consistent, objective and reliable audit and certification process by all CBs cooperating with ISCC globally, and the compliance of ISCC System Users with ISCC requirements. The ISCC Integrity Programme supports the quality and risk management of ISCC and provides valuable feedback to ISCC regarding the implementation of the standard and its verification. Therefore, it is an essential part of the continuous improvement process of the ISCC System.

*Quality and risk
management
tool*

The ISCC Integrity Programme consists of on-site and/or remote assessments. ISCC Integrity Assessments may focus on the compliance of ISCC System Users, on the performance of individual auditors conducting ISCC audits and on the overall performance of CBs offering ISCC certification services. ISCC does not charge any costs of Integrity Assessments to the participants. The assessments are conducted by ISCC Integrity Auditors and can take place in any country where CBs cooperating with ISCC carry out activities and audits in the framework of ISCC. The ISCC Integrity Auditors work on behalf of ISCC and must be independent and free of any conflicts of interest.

*CB and
System User
Assessment*

Candidates for ISCC Integrity Assessments (System Users, CBs and auditors) are selected partly randomly and partly on risk-based criteria.

*Selection of
candidates*

Risk-based criteria for System Users include:

- > Indication of non-compliance or fraud
- > Location/Region
- > Scope of certification
- > Application of individual life cycle emissions calculation
- > Type(s) of material handled as sustainable
- > Certification history

Risk-based criteria for CBs/Auditors include:

- > Number of ISCC certificates issued by CB
- > Number of audits conducted by auditor
- > General performance of CB/auditor

12.2 Integrity Assessment at ISCC System User

The objective of the System User Integrity Assessment is to assess the audit and certification process of the CB by auditing a sample of its certified clients. During this assessment (re-audit), the ISCC Integrity Auditor carries out an

Objectives

evaluation of the certified System User on its conformity with the applicable ISCC audit procedures and other relevant documents. The results of this assessment are then compared with the CB's audit report from the last regular certification audit. If there are indications of non-conformities or fraud the objective of the Integrity Assessment is to verify compliance of the System User with ISCC requirements.

The participation of ISCC System Users in a scheduled ISCC Integrity Assessment is mandatory. Refusal to participate or non-cooperation are considered critical non-conformities with ISCC requirements and will be sanctioned (see chapter 11). Participation of System Users in ISCC Integrity Assessments may be requested by ISCC up to 18 months after the end of the last ISCC certificate.

Mandatory participation

At least 4 weeks prior to the scheduled date, the CB and their client (ISCC System User) shall receive a formal invitation letter from ISCC via email. The first letter sent out by email will contain the scheduled date(s) of the ISCC Integrity Assessment, the relevant ISCC registration number and the respective operational units to be visited and the certification scopes to be assessed.

Formal invitation

The selected participant is obliged to respond to the invitation letter within 72 hours/3 working days of receipt of the first invitation letter to confirm participation on the date proposed by ISCC. Rescheduling may be possible if the System User submits a written request and provides sufficient reasoning for the request within the aforementioned timeframe. If the System User cannot confirm the date proposed by ISCC, the System User is obliged to immediately provide ISCC with two alternative dates. These alternative dates shall be within a period of two months of receipt of the first invitation letter sent by ISCC. The ISCC management will then assess the proposed date(s). If a System User does not reply within the timeframe this is considered non-cooperation.

Setting of the date

ISCC shall also be able to conduct unannounced System User Integrity Assessments i.e. without prior notice, or conduct System User Integrity Assessments with notice less than four weeks prior to the proposed date. ISCC will apply these two options only in exceptional circumstances.

Unannounced Integrity Assessments

A representative from the CB may attend the assessment as an observer. Participation of the respective CB during this Integrity Assessment is strongly recommended but not mandatory. However, the CB must not influence the assessment in any way.

CB observer

For the purpose of determining the exact schedule of the Integrity Assessment, the ISCC management or the ISCC Integrity Auditor will contact the System User after the date has been confirmed. A schedule for the assessment and a list of documents that are required prior to, during and after the audit will be provided to the participant. This may include, if applicable, geo-coordinates of the farms or plantations supplying the respective operational unit (e.g. first gathering point) provided in shape- or kmz data

Assessment plan and schedule

format, calculations for life cycle emissions (if an individual calculation has been conducted), mass balances and other relevant documents or evidence. System Users are obliged to provide these documents to ISCC in a timely manner prior to the Integrity Assessment so as to enable a full evaluation of all applicable requirements.

System User Integrity Assessments usually cover the scopes of one ISCC registration and the previous certification audit of that specific System User. The ISCC Integrity Auditor is entitled to assess more recent operations or operations that reach further back if this is considered as relevant by the auditor. If multiple ISCC Certification Systems apply, the fulfilment of the requirements of each system may be checked. If applicable, any external storage facility or collection sites (also run by subcontractors), any supplying farm, or any point of origin for waste and residues may also be part of the assessment. The System User Integrity Assessment is a full assessment of the System User's facilities and procedures and will evaluate compliance with all applicable ISCC requirements. The ISCC Integrity Auditor must be granted access and insight to all sites and properties (including business premises, operating rooms and storage and means of transport) during business and working hours and must be allowed to make all necessary inspections. The ISCC Integrity Auditor must also be granted access to and examination of all available business documentation (in written and electronic form) that the auditor considers relevant for the assessment. The System User must provide any further information that is considered relevant by the Integrity Auditor.

Scope of the assessment

Upon request by the ISCC Integrity Auditor, the System User shall be obliged to immediately enable the cross-checking of the accuracy of sustainability claims. This includes but is not limited to the evidence for individual deliveries of sustainable material, such as Sustainability Declarations or delivery documents, received from suppliers or sellers, subcontractors (such as logistic providers or dependent collecting points) and provided to recipients or buyers. The ISCC Integrity Auditor is entitled to request the corresponding evidence directly from the suppliers or sellers, subcontractors and from the recipients or buyers of the System User. If requested by the ISCC Integrity Auditor, the System User shall be obliged to immediately request copies of the corresponding evidence from the supplier or seller and/or the recipient or buyer of sustainable material. During this process the ISCC Integrity Auditor shall be copied in the entire communication to ensure transparency. Any ISCC System User shall be obliged to cooperate in this cross-checking process. Responses should be provided within a period of 14 days.

Cross-checking of documents

The assessment may be structured in the following way (example):

- > **Opening Meeting** (presentation of ISCC Integrity Auditor and ISCC Integrity Programme, definition of scope of assessment, description of the main activities of the participant that are related to ISCC certification).

Structure of the assessment

- > **Inspection of facilities** (inspection of production unit, warehouses, buildings, machinery etc. This may include interviews of staff).
- > **Review of procedures and records** (check of applicable procedures, records and documentation).
- > **Preparation of Integrity Report** (the ISCC Integrity Auditor will require some time to prepare the Integrity Report on site).
- > **Closing meeting** (Integrity Report will be presented and explained to the System User and CB representative by the ISCC Integrity Auditor).

The final schedule of the audit will be agreed upon between the System User and the ISCC Integrity Auditor and may differ from the above example. The ISCC Integrity Auditor is entitled to prolong the Integrity Assessment (on-site or remotely) if more time is required to complete the assessment.

The ISCC Integrity Report is prepared by the ISCC Integrity Auditor on the date of the Integrity Assessment. The report contains the basic data of the assessment (assessed company, contact persons and persons present during the assessment, ISCC registration number, location of the audit/s etc.), and the findings of the ISCC Integrity Auditor. It shall be presented to the System User and the Certification Body within three days after finalisation and shall also be forwarded to the ISCC management. After an internal review at the ISCC head office, a digital copy of the Integrity Report shall be sent to the CB and the System User. Depending on the non-conformities detected during the ISCC Integrity Assessment, ISCC is entitled to request corrective measures from the CB and/or the System User so as to re-establish compliance with the ISCC requirements. If applicable, the report may contain the results of a detailed remote sensing analysis in order to verify compliance with relevant approved CORSIA sustainability criteria and/or ISCC Principle 1, which will be included as an attachment.

Integrity Report

The ISCC Integrity Auditor may find non-conformities that were also found by the CB during the previous audit, non-conformities that were not found by the CB during the previous audit and non-conformities that were not found but should have been detected during the previous audit. Minor non-conformities and their resolution shall be explicitly assessed by the CB during the subsequent regular recertification audit and will be checked by ISCC management when reviewing the recertification documents. Major non-conformities detected during the ISCC Integrity Assessment may require immediate action. "Immediate action" refers to corrective measures to resolve the non-conformities which must be taken by the System User and proven to the CB and ISCC within a given deadline after the official receipt of the ISCC Integrity Report. Furthermore, if major non-conformities are detected the CB must suspend the relevant certificate immediately for a period of 40 days. If the non-conformities cannot be corrected within this period of time, the CB is obliged to withdraw the System User's current certificate. If critical non-

Detection of non-conformities

conformities are detected during the ISCC Integrity Assessment the CB is obliged to withdraw the System User's current certificate immediately. See chapter 11.2 for further information. Depending on the severity of the non-conformities, and if the overall performance of the CB or the auditor is found to be not acceptable, the ISCC management is also entitled to decide on sanctions against the auditor and/or CB (see chapter 11.3).

12.3 Integrity Assessment at Certification Body Office

An ISCC Integrity Assessment at the office of a cooperating CB only takes place in exceptional cases as the surveillance and monitoring of CBs is usually performed by the national public authority responsible for recognition or by the accreditation body responsible for accreditation of the CB.

*CB office
assessment*

The participation of the Certification Body in a scheduled ISCC Integrity Assessment at the Certification Body office is mandatory. Refusal to participate is considered a critical non-conformity with ISCC requirements and will be sanctioned (see chapter 11). Certification Bodies are obliged to immediately cooperate in the scheduling of the audit especially with respect to confirming the date of the audit and providing relevant documents in advance if requested.

*Mandatory
participation*

The objective of the ISCC Integrity Assessment at the office of a cooperating CB is to assess the performance of the internal ISCC related processes of that CB. This includes the following elements:

Objectives

- > The required accreditation of the CB.
- > Verification of the training and qualification of auditors (CVs, training records and evidence of competence of all ISCC auditors, etc.).
- > Registration procedures for customers and register of audits carried out and scheduled.
- > Documentation of audit reports, review process of audit reports and monitoring of timely implementation of corrective actions.
- > Documentation of risk assessments conducted prior to audits of ISCC System Users (e.g. remote sensing analysis of farms and compliance with relevant CORSIA sustainability criteria and/or ISCC Principle 1).
- > Decision process for the issuing of certificates.
- > Registry of certificate holders.

The assessment is normally structured in the following way, but may be subject to individual scheduling with the ISCC Integrity Assessor:

*Assessment
structure*

- > **Opening Meeting** (presentation of ISCC Integrity Auditor and ISCC Integrity Programme, definition of scope of assessment, description of activities of CB related to ISCC certification).

- > **Data collection** (Definition of the company's structure, activities and personnel related to ISCC. Statistics like the number of certified clients/ certificates. Other required general information).
- > **Description of the certification process** (client registration, audit planning and preparation, pre-audit assessments, reporting, monitoring of corrective actions, issue of certificate, information transfer to ISCC, internal database and documentation).
- > **Review of certification files** (certain files, processes and clients will be selected and reviewed).
- > **Review of auditor qualification files** (some qualification files will be reviewed to check compliance with ISCC requirements for auditors (if applicable) and internal qualification processes).
- > **Preparation of Integrity Report** (ISCC Integrity Auditor will require some time to prepare the integrity report).
- > **Closing meeting** (Integrity Report will be presented by the ISCC Integrity Auditor and findings explained to CB.).

12.4 CB and Auditor Evaluation and Classification

Each assessment is documented in an Integrity Report. The Integrity Auditor shall present the report to the System User and the Certification Body within three days after finalisation and shall also forward it to the ISCC management. Integrity Reports may be sent to the CB's accreditation body or competent authority, so that it can be used as an input for their next assessment.

Integrity report

Based on one or more Integrity Reports and, if applicable, the failure of the CB and the auditor to demonstrate improvement made compared to previous assessments, ISCC will classify the performance of the CB/auditor. In the case of an unacceptable or insufficient performance, the CB will be informed about this classification and shall have the opportunity to respond in the form of a written statement within fourteen days of notification.

*Classification of
CB/auditor
performance*

The ISCC performance classification of the CB/auditor will be based on the following:

- > The individual Integrity Report
- > The CB's/auditors written statement in response to the Integrity Report

Three classifications of the CBs performance are possible:

Three categories

- 1 **Good performance:** No systematic or serious deviations or non-conformities by the CB have been found. The CB/auditor demonstrates a good performance. No specific reassessments or immediate measures are scheduled.

2 **Performance needs to be improved:** Requires the CB/auditor to improve performance and implement improvement measures. This includes but is not limited to:

- > Negligence of the ISCC standard's regulations in a way that has no substantial negative impact on the implementation of ISCC
- > One or more minor technical failures in the audit process

Procedure if the performance needs to be improved

- > The CB must implement corrections/corrective actions
- > New assessments (surveillance audits or re-assessments) or the submitting of evidence can be required to verify the effectiveness of the corrective measures.
- > Individual auditors may have to receive specific training and/or may only be able to conduct further audits under specific conditions (e.g. only if accompanied by further auditors).
- > A Warning or a Yellow Card may be issued as specified in chapter 11.3.

3 **Unacceptable performance:** Puts the overall competency of the CB/auditor with regard to ISCC in doubt. In such a case, major or critical non-conformities with ISCC requirements and procedures are observed. These include but are not limited to:

- > Deliberate and/or repeated ignorance or negligence of the ISCC standard's regulations
- > One or more serious technical failures in the audit process
- > Large number of technical failures in the audit process
- > Verified fraud

Procedure in the case of unacceptable performance

- > Further audit(s) can be planned immediately by ISCC to investigate whether it was an isolated incident or a general way of working, but one single assessment can also result in this classification.
- > The CB must implement corrections/corrective actions immediately.
- > Individual auditors may be suspended from conducting further ISCC audits.
- > The CB reports to ISCC on its immediate actions for improving its performance. ISCC can further assess improvement

measures and impose appropriate measures to ensure future compliance with the ISCC requirements.

- > A Red Card may be issued as specified in chapter 11.3. If unacceptable performance is detected repeatedly, this may lead to the termination of the certification agreement between the CB and ISCC.
- > In case of verified fraud, ISCC may terminate the cooperation agreement with the CB as specified in chapter 11.3

13 Internal Monitoring

ISCC continuously monitors and documents the compliance of system users and CBs internally in order to improve the credibility of the claims made in the framework of CORSIA. The internal monitoring of ISCC consists of four pillars:

Annual summary

- 1 Internal document review:** ISCC constantly reviews and cross checks all certification documents submitted to ISCC by the CBs, i.e. the registrations, audit procedures and the copy of the certificate. Irregularities or non-conformities found during this review will be documented and directly addressed and communicated by ISCC to the respective party (CB and/or System User).
- 2 ISCC Integrity Programme:** The results of the ISCC Integrity Programme are evaluated continuously on a case-by-case basis (see chapter 12). Conclusions are drawn with respect to improvement of the overall system and interaction with CBs and System Users.
- 3 Reports from CBs:** Once a year the CBs submit an annual evaluation report to ISCC (see ISCC Document 103 chapter 4.3). In addition regular meetings (twice a year) with CBs for information exchange and feedback on how the system can be further improved take place.
- 4 Complaints and reports from external parties:** In the case that ISCC receives substantiated information about irregularities or non-conformity of system users or CBs from external stakeholders, ISCC immediately investigates such reports. This can lead, for example, to Integrity Audits conducted by ISCC (see chapter 12) or surveillance audits conducted by the CB (see chapter 11.1).

Four pillars of internal monitoring

14 ISCC Impact Assessment

The ISCC Impact Assessment has the goal to monitor the outcomes and impacts of ISCC certification and to evaluate if ISCC's strategies are effective to reach ISCC's mission and goals and lead to the desired outcomes and impacts. The ISCC Impact Assessment covers all of ISCC's certification systems and is conducted on a regular basis. When conducting the Impact

Monitoring the impact

Assessment, ISCC takes into account the principles laid down by ISEAL for “Assessing the Impacts of Social and Environmental Standards Systems”.⁹

The ISCC Impact Assessment monitors and evaluates the information gathered through the registration and certification process of System Users as well as through the ISCC Integrity Programme. Generally, all sectors that are covered by ISCC certification are subject to the Impact Assessment. However, as ISCC’s principles are primarily designed to improve the sustainability of agricultural production, it is expected that the most significant impacts from certification will occur on the farm level. Therefore, a focus of the ISCC Impact Assessment will be on assessing the impact on farm level. Other certified System Users can be included, in particular regarding the outcomes and impacts of certification on the GHG performance, the management systems, and the traceability of products.

Evaluating the impact

One part of the Impact Assessment is the assessment of the internal system performance. The system performance includes the system coverage meaning e.g. the number of issued certificates, the number of System Users and the countries in which they operate. Furthermore, it includes the number of withdrawn certificates, the performance of CBs and the number and results of ISCC Integrity Assessments. This information will be used for the continuous improvement of the ISCC system.

Assessment of system performance

The goal and mission of ISCC is to induce positive long-term social, environmental and economic impacts. They can be subsumed under four main goals and should be part of the Impact Assessment:

Support of ISCC’s goal and mission

- > Land with high biodiversity and high carbon stock is protected
- > Good agricultural practices protecting soil, water and air are applied
- > Human rights, labour and land rights are respected
- > Emissions of greenhouse gases are reduced

ISCC publishes an Impact Report on a regular basis to reflect ISCC’s contribution to the sustainable development of the bioeconomy and circular economy, the extent of ISCC’s operations and the scheme’s actual impact. The reports are based on in-depth data assessment and stakeholder dialogue. The reports may also include case studies to provide tangible examples of the global application of ISCC certification. Future editions of the report will consider and assess the development and impact of the ISCC CORSIA scheme as well. The Impact Reports are publicly available on the ISCC website.

ISCC Impact Report

⁹ ISEAL Code of Good Practice – Assessing the Impacts of Social and Environmental Standards Systems, Version 2.0 – December 2014.

15 Annex I: ISCC Quality Guidelines

All institutions of the ISCC System are committed to clear quality policies as guidelines for daily operations. These guidelines are the basis for a successful implementation and performance of the certification system.

ISCC Quality Guidelines

Ambitious Standard: The implementation of the ISCC CORSIA system is an essential contribution to climate protection. It also contributes to an environmentally, socially and economically sustainable production of aviation fuels. ISCC is practical and implementable, but clearly requires that all relevant elements of the supply chain act sustainably in accordance with the system.

Multi-stakeholder process: ISCC is a multi-stakeholder organisation. Decision-making processes are based on consensus. They allow the involvement of all interested parties in guaranteeing a sustainable production of aviation fuels.

Open to everyone: The standard development is to be carried out in a way that all interested users are able to participate and to use its advantages without discrimination.

Efficient system processes: ISCC conducts an extensive stakeholder dialogue that involves interested parties; at the same time, the efficient structures and responsibilities allow fast and consistent decision-making processes.

Implementation of the regulatory framework: The claiming of emission reductions through the use of sustainable aviation fuels under the framework of CORSIA requires the fuel's compliance with the CORSIA requirements. ISCC guarantees a continuous monitoring of these processes and a reliable implementation of the respective requirements in its system regulations.

Cooperation with other certification systems: ISCC acts as an innovative partner of different institutions. An open discussion with other certification systems and the possibility of mutual recognition offers additional potential for an efficient market access by reducing audit efforts.

Risk management: Indicators, which can cause an incorrect declaration of material and products as sustainable, are continuously monitored by means of an integrated risk management. Immediate corrective actions reduce the impact of these risks to a minimum. The ISCC Integrity Programme is used randomly but also in cases of justified allegations to support the management of risks.

Competence of the parties: The competence of the parties is relevant for the quality, impact and results of the system and is developed and improved continuously. The training, application and further development of know-how are important elements for all parties involved with ISCC as well as for the bodies and persons involved in the certification process.

Continuous improvement: ISCC continuously monitors its processes and structures. Every five years, the system as a whole is revised and the standards are adapted according to the latest scientific findings, feedback and complaints from stakeholders and to incorporate practical experiences and best practices. The system is also revised in order to incorporate significant changes to the CORSIA requirements as specified by ICAO.