

On 11 December 2020, we have received a draft report of the Greenpeace Report “Certifying Destruction” with the opportunity to comment until 18 December 2020. After handing in feedback and statements, no further attempts from Greenpeace’s side were made to enter into a dialogue.

The following table aims to highlight statements made in the final Greenpeace Report “Certifying Destruction” published on 10 March 2021 that are either:

- Statements that are polemically formulated and contain biased claims
- Statements that are incorrect
- Statements that present supposedly simple relationships and results, but whose context is more complex than presented here

<b>Statements made in the Discussion Paper</b>	<b>Comments ISCC</b>
<b>Summary</b>	
<p>The scheme relies heavily on self-reporting (sustainability declarations and self-declarations for group members), and thus appears to offer wide scope for actors to game and cheat the system. There is no online database reporting on sustainable material produced, so independent validation of this information is not possible. The auditing process lacks transparency, and because companies choose and contract directly with CBs themselves, the independence of the CBs cannot be guaranteed.</p>	<p>This statement is not correct. ISCC System Document 203 contains strict requirements to ensure the traceability of materials throughout the entire supply chain. Under ISCC, materials can be traced back “step-by-step” through the entire supply chain according to the information provided on the Sustainability Declarations and by posing clear criteria for the documentation and management system of every economic operator in the supply chain (see ISCC System Document 203, 3). Independent validation of information forwarded is taking place through independent third-party auditors that are recognised by a competent national public authority, or accredited against ISO/IEC 17065, by a national accreditation body which is a member of the International Accreditation Forum (IAF), by the bodies referred to in Article 4 of Regulation (EC) No. 765/2008, by bodies having a bilateral agreement with the European co-operation for Accreditation (EA), or by an accreditation body which is a full member or associate member of ISEAL. (see ISCC System Document 103)</p>
<p>Due to serious flaws in governance, standards, traceability, auditing and implementation, this looks like a “tick in the box” scheme that helps to greenwash commodities for biofuels.</p>	<p>Based on our general feedback provided here, we consider this statement as false, factually unfounded and damaging to reputation. There is no basis for this assertion.</p>
<b>Governance and decision making</b>	
<p>- ISCC is governed by an association with more than 140 members, which it proclaims to include research institutes and NGOs. However, over 90% of its members are producers, processors, traders or others active in the</p>	<p>The ISCC Association is a multi-stakeholder organization with more than 160 members. The ISCC Statutes clearly state that “Natural or legal persons willing to become members shall be prepared to support production, processing and utilisation of sustainable biomass and bioenergy in</p>

<p>biomass supply chain, with just four member organisations being NGOs.</p> <p>-The General Assembly is ISCC's highest decision-making body; all members participate. With such a high proportion of members being private companies from the biomass industry, ISCC is to all intents and purposes controlled by the industry.</p> <p>-The Board, which manages the affairs of the association, currently consists only of industry representatives and two researchers. NGOs are not represented.</p>	<p>the context of the ISCC system and thereby make a contribution to climate protection and ecological and social sustainability." (ISCC Statutes §3 (2)) ISCC does not impose any constraint for members to join, except for the prohibition of Certification Bodies to join for reasons of independence. Important members from the NGO sector are also participating in the ISCC Association. The statement 'ISCC is to all intents and purposes controlled by the industry' is one of many insinuations of this paper, that are devoid of any facts. Please also take the time to review ISCC's continuous engagement in benchmarks to improve that are mainly conducted by NGOs. In addition, ISCC cooperates with the WWF (founding member of ISCC), Welthungerhilfe (<i>World Hunger Aid</i>), Textile Exchange and the Tropical Forest Alliance.</p>
<p>ISCC is a subscriber to the ISEAL Alliance, but not a full member</p>	<p>ISCC is a subscriber to ISEAL and references the ISEAL Codes in the ISCC System Documents. See e.g., ISCC System Document 102 and the ISCC Impact Report. Further, as we do recognize that ISEAL is an important alliance to strengthen sustainability standards, we would like to highlight that a membership with a private-sector initiative like ISEAL alone does not ensure the quality of a scheme. ISCC puts a high focus on the integrity of its operations and continuously works to improve the standard. For more details refer to ISCC System Document 102, chapter 11, 12 and 13.</p>
<p><b>Standards</b></p>	
<p>(...) Cross-compliance, although it promotes environmentally friendly land management outcomes, is seen to be relatively weak from the standpoint of sustainability. This also suggests that Principles 2–6 in themselves are not particularly strong or ambitious. Indeed, the ISCC standard allows any company operating in a country that has ratified the fundamental core International Labour Organization (ILO) conventions to be considered in compliance with Principle 4 relating to compliance with human, labour and land rights 'as long as the auditor, based on a risk assessment does not come to a different conclusion'.</p> <p>-The ISCC standard includes no requirement for participatory mapping but does require a participatory social impact assessment and FPIC for any newly acquired lands. It largely relies on compliance with international conventions and relevant national and local laws to safeguard Indigenous rights.</p>	<p>ISCC Principles 2-6 were developed in a multi-stakeholder process and are continuously improved, mainly by engaging in benchmarks and by considering the feedback from ISCC members, system users and external stakeholders. ISCC is accepted as a strong and reliable certification scheme by relevant NGOs in the fields of ecological and social sustainability, such as e.g., the IUCN, and Textile Exchange. ISCC is also participating in further improving benchmarks on a regular basis, e.g., by the WWF. ISCC is currently in the process of reviewing its standard and in this context will improve and strengthen also the requirements and criteria under Principles 2-6.</p>
<p><b>Traceability and transparency</b></p>	
<p>(...) The recipient is responsible for verifying that the supplier had a valid ISCC certificate at</p>	<p>This statement again is a claim based on assumptions/subjective interpretations and without</p>

<p>the time of dispatch. This approach clearly prone to abuse by unscrupulous actors – the scheme includes a ‘plausibility check’ that compares material output from a farm or plantation with its area and yields but given the variation in actual yields at the farm/plantation level this seems an insufficient safeguard to prevent unsustainable or illegally produced material being passed off as sustainable. While claiming to provide full traceability throughout the supply chain, ISCC acknowledges that ‘some transactions may not be represented or hidden’</p>	<p>context. ISCC has very clear requirements for transparency and traceability throughout all certified supply chains. These are stated in ISCC System Document 203 in particular and are complemented by ISCC System Documents 102, 103 and 201. In addition, ISCC continuously engages in stakeholder dialogues, e.g., through Technical Committees and Working Groups to further strengthen the traceability and transparency of ISCC supply chains. Please refer to the ISCC System Updates (particularly the update from 19 October 2019 on this matter) to be able to evaluate the whole picture: <a href="https://www.iscc-system.org/update/01-october-2019/">https://www.iscc-system.org/update/01-october-2019/</a></p>
<p>There is no online database reporting on sustainable material produced, so independent validation of this information is not possible.</p>	<p>ISCC ensures full traceability through the strict documentation and verification of all relevant information on sustainability declarations, quantity bookkeeping and documentation management requirements. Online databases can be used by system users whenever possible. The Nabisy database is mandatory for ISCC EU system users in Germany.</p>
<p>ISCC requires mapping of plantation areas (but not the associated conservation areas) for independent smallholder certification, but this generally requires external technical support.</p>	<p>This statement is out of context. Every farmer under ISCC is required to provide information about the plantation areas. In addition, the entire land (agricultural land, pasture, forest, any other land) of the farm or plantation, including any owned, leased or rented land is subject to certification (ISCC System Document 201, 3.3).</p> <p>In order to reduce barriers for independent smallholders (ISH) and to reduce implementation and certification costs, essential characteristics and features of the independent smallholder certification process are: Specific upfront registration programme, GRAS monitoring tool, group certification approach with Central Office (CO), specific training for ISH via train-the-trainer concept, access to funds/price premiums (ISCC System Documents 201-5, 1). After pre-registering, the company has to provide information on the considered region. This includes information such as geo-coordinates of the region and coordinates of the smallholder’s land subject to ISCC certification. ISCC will conduct a risk assessment in order to identify risk areas (overlap of the considered region with Principle 1 areas, such as primary forests, peatlands or biodiverse grassland, see ISCC System Document 205-1, 4.2).</p>
<p>ISCC has an online complaints procedure, but it is unclear what action is taken on complaints. No details – or even a list – of complaints is published on its website.</p>	<p>This is not correct. ISCC System Document 102, chapter 9 includes clear descriptions on how ISCC handles complaints and conflicts of any form. Further, please note that complaints can be submitted officially through the ISCC website. Please see here: <a href="https://www.iscc-system.org/process/how-to-submit-complaints/">https://www.iscc-system.org/process/how-to-submit-complaints/</a></p>

<p>(...) Summary reports are available on the ISCC website, but only for companies that have achieved certification. (...)</p>	<p>Summary audit reports: All ISCC audit reports are available on the ISCC website: <a href="https://www.iscc-system.org/certificates/all-certificates/">https://www.iscc-system.org/certificates/all-certificates/</a></p> <p>Please also note that this is not only the case for all valid certificates, but also for withdrawn certificates.</p>
<p><b>Audits</b></p>	
<p>ISCC audits are conducted by auditors on behalf of CBs that have signed a cooperation agreement with ISCC. However, the independence of the audit process and thus the credibility of the certification is compromised by the fact that companies seeking certification can themselves choose any CB that has ISCC recognition and then contract directly with their chosen CBs to provide them with audit services.</p>	<p>This evaluation is not acceptable. ISCC has very strict and clear requirements to ensure the independence of certification bodies (CBs) and auditors. Please see ISCC System Document 103, chapter 3 and the comment in this table. In addition, the requirements that are mentioned do not appear to be adequate to evaluate whether a CB is independent or not.</p> <p>In fact, a rotation of auditors/CBs is closely monitored to ensure that no “CB hopping” takes place, allowing a system user to simply switch to another certification scheme if non-compliances are detected. This is clearly stated in ISCC System Document 103, 6: ISCC system users may freely choose ISCC recognised CBs to perform a certification according to ISCC. System users may also change from one CB to another CB for recertification. In this case, specific requirements with regards to the integrity of the system must be met.</p> <p>These measures are meant to address a system users’ certification history appropriately and to reduce the risk that CBs are changed with the intent to cover up infringements or violations of ISCC requirements (“CB hopping”).</p>
<p>Audits are performed at different points in the supply chain and verify documentation, including sustainability declarations. But the sustainability of the material being delivered is determined solely on the basis of the audit of the grower.</p>	<p>The sustainability requirements under ISCC refer to producers and are transferred transparently and traceable throughout the entire supply chain, (see the comment above). Further, GHG saving requirements are applicable for all elements in the downstream supply chain (except traders).</p>
<p>Desk-based risk assessments are conducted prior to each audit to identify potential issues. Where high risks are identified, a more extensive audit is conducted. However, there is a lack of transparency regarding the risks that are identified, and the active measures put in place to mitigate risk.</p>	<p>This statement again does not consider the full context. ISCC System Document 204 describes the full risk assessment to be done by auditors. General and specific risk indicators are provided, and chapter 4.2.2 describes how to evaluate this risk. In addition, auditors are asked to clearly define how they assessed the risk level in the audit procedure. (ISCC audit procedure for Farms/Plantations)</p>
<p>Farms and plantations are audited and certified either as single sites or as part of a producer group. For group certification, ISCC uses a system of self-declaration in which individual growers report on their own compliance with sustainability criteria. Only the head office</p>	<p>ISCC has clear requirements for group audits (see ISCC System Document 206). Samples are audited on-site by the auditor and its size is determined by the risk factor. Sampling is a validated approach, proven in practice.</p>

<p>responsible for the group and a sample of group members are audited. This clearly reduces an audit to a tick-in-the-box exercise in which dishonesty can go undetected.</p>	
<p><b>Implementation and effectiveness</b></p>	
<p>An independent review focusing on the palm oil sector furthermore showed that ISCC has significant weaknesses, ranging from its domination by the private sector and related organisations to its lack of transparency, weaknesses in monitoring and evaluation and a lack of attention to Indigenous Peoples.</p>	<p>This review is referenced to be done by the Forest Peoples Program in 2017. Please note that ISCC has improved its system since then, especially focusing on strengthening the rights of Indigenous People (FPIC). Further, the Forest Peoples Program Benchmark included several wrong statements about the ISCC certification system. This issue was addressed by ISCC by the time this benchmark was done.</p>