

Final revision – September 2019

EWABA Standard of Transparency

Preliminary remarks

1. EWABA members support the immediate adoption of a series of additional measures to further increase transparency and assurance along the whole biofuels value chain, with specific requirements for the wastes and residues feedstock supply chains. These agreed measures, concerning Collecting Points, Points of Origin, Traders, Biofuel Producers and Processing units, are listed in **Annex I** below.
2. These measures constitute the “EWABA Standard of Transparency” and preliminary drafts have already been presented to certification schemes for their consideration and adoption. The proposed measures are to be implemented as soon as administratively feasible within EWABA Members’ own operations and verified by an accredited certification body during their upcoming audits. Their applicability is to be optional for 1 year as from their entry into force and mandatory thereafter for all users of the certification schemes.
3. EWABA calls certification schemes to prepare for the adoption of downstream physical tests on the composition of UCO and potentially of other waste feedstock streams. The adoption of reliable physical tests depends on the evolution of technical progress. In absence of reliable physical tests, comparisons against sets of characteristic profiles of oils are to be favoured. EWABA consulted its members on the reliability of physical characteristics to distinguish between consignments of used cooking oil and other non-waste vegetable fats or oils. It was agreed that there is currently no reliable indicator to differentiate oil that has been used to cook compared to non-waste oil that has been adulterated to look like used cooking oil. There are very characteristic profiles of unadulterated non-waste vegetable oils and fats. Certification schemes need to ensure that auditors are trained in identifying these non-waste products so that they can identify co-mingling of waste with non-waste or false declarations.
4. EWABA members found the training and diligence of auditors together with certification schemes’ responsiveness to allegations of fraud in need of manifest improvement. EWABA requests certification schemes to allocate greater resources to policing, complaint-handling and follow-up in response to whistleblowing procedures. In addition, in order to mitigate possible auditor bias, certifications bodies should be limited to maximum consecutive audits of two years.
5. EWABA calls once more on certification schemes to reach an understanding to prevent that companies whose certificate is withdrawn are allowed to apply for new certificates under other schemes or under different company names. The withdrawal of any certificate should result in an 11-month quarantine period during which no certificate should be granted to the relevant company notwithstanding name changes (unless valid reasons for a reissuance or revocation of the suspension are proved).
6. EWABA requests certification schemes to prioritise immediate action on high-risk hotspots. Highest risk of fraud occurs where volumes are greatest and where there is coexistence of sustainable and non-sustainable feedstocks and fuels. Certification schemes should address the points of highest risk with greatest priority. Extra transparency should not result in increased administrative burden on restaurant owners. Certification schemes should work with industry to map the supply chain points/geographies/product categories of highest risk. Auditors should be trained in identifying indicators of high risk (i.e. single product points are low risk). If an auditor sees physical/commercial deliveries of palm into a UCO first collector it should be identified as high risk. If a trader sells multiple products, waste/non-waste, high GHG/low GHG, certified/non-certified they should be considered high risk.

Annex I – List of measures to be adopted

I. Applicable to Collecting Points (CP) and Points of Origin (PoO)

1. Reduction of the threshold for PoO from 10mt per month. If a PoO generates more than the revised threshold of a specific waste/residue, the PoO could be subject to an on-site audit (based on a sample) if the auditor has suspicions or other reasons justifying an audit. On site audits may not be necessary at auditors' discretion if they can gain assurance by other means. Certification schemes should elaborate guidelines for PoO audits to ensure that they are effective, reasonable and fit for purpose. During the sampling the auditor must verify the correspondence of the documents and the quantities exhibited by the CP with those in possession of the PoO.
2. Amount of waste generated per month (or year) at the CP must be stated explicitly on the certification scheme self-declaration. This requirement is not applicable to PoOs. Certification schemes should consult with industry on the format for reporting, i.e website interface, data security etc.
3. Auditors must select a sample of all points of origin that have signed a self-declaration (above and below the threshold) and verify their existence, e.g. through a telephone call, research of websites, etc. Feedback from system users (especially from PRC and Indonesia) will be required how this could be done practically.
4. Auditors shall be explicitly obliged to assess PoO on-site if there is doubt about the existence of the PoO or in case there is indication of non-compliance with certification schemes' requirements. In the case of "regular risk" the number of samples to be verified must be predetermined, specified and based proportionally on the amount of UCO collected. Points of origin generating more than 5mt of a waste per month must be reported to the CB and to certification schemes.
5. Evidence or documents for all individual deliveries must be available at the CP and provided to the auditor (e.g. waste disposal agreement, delivery slips, self-declarations, etc.).
6. Amounts of sustainable material (incoming and outgoing) must be reported to certification schemes on a quarterly basis (reporting via website, certification schemes to share the reported amounts with the respective CB). Certification schemes should create a database for automatic insertion of indicators.
7. Auditors and certification schemes shall be entitled to double-check and verify deliveries to (downstream) recipients of sustainable material, i.e. recipients shall be obliged to provide copies of the sustainability declaration issued by the collecting point for an individual delivery (based on a random and risk-based sample). If not available on the day of the audit, suppliers and customers will have 30 days to comply with the auditor's expectations for a response.
8. Mandatory surveillance audit by the CB six months after the first (initial) certification.
9. Individual GHG calculations shall generally be submitted to the certification scheme by the CB together with the certification documents.
10. If a collection point has multiple storage sites, the auditor should audit the mass balance of every storage site.
11. Certification schemes should create risk indicators based on the scale and complexity of each operation.
12. Collectors should aim to use the best available technology to improve traceability including tracking containers by bar codes and/or labels (specifying name of collector, waste disposal code once the empty container is provided), or using digital collection receipts, GPS tracking, blockchain, etc.
13. The mass balance must contain both the input and the output of sustainable material with unsustainable material.

II. Applicable to Traders

1. Auditors and certification schemes shall be entitled to double-check and verify deliveries received from (upstream) suppliers and deliveries made to (downstream) recipients of sustainable material, i.e. suppliers and recipients shall be obliged to provide copies of the sustainability declaration issued for individual deliveries (based on a random and risk-based sample). If not available on the day of the audit, suppliers and customers will have 30 days to comply with the auditors expectations for a response.
2. Amounts of sustainable material bought and sold must be reported to certification schemes on a quarterly basis (reporting via website, certification schemes to share the reported amounts with the respective CB).
3. Mandatory surveillance audit by the CB six months after the first (initial) certification.
4. Individual GHG calculations shall generally be submitted to certification schemes by the CB together with the certification documents.
5. If a trader has multiple storage sites, the auditor should audit the mass balance of every storage site.

III. Applicable to Biofuel Producers / Processing Units

1. Auditors and certification schemes shall be entitled to double-check and verify deliveries received from (upstream) suppliers and deliveries made to (downstream) recipients of sustainable material, i.e. suppliers and recipients shall be obliged to provide copies of the sustainability declaration issued for individual deliveries (based on a random and risk-based sample). If not available on the day of the audit, suppliers and customers will have 30 days to comply with the auditor's expectations for a response.
2. Amounts of sustainable material (incoming and outgoing) must be reported to certification schemes on a quarterly basis (reporting via certification schemes website, certification schemes to share the reported amounts with the respective CB).
3. Mandatory surveillance audit by the CB six months after the first (initial) certification.
4. Individual GHG calculations shall generally be submitted to certification schemes by the CB together with the certification documents.
5. If the producer/processor has multiple storage sites, the auditor should audit the mass balance of every storage site.
