

## ISCC – International Sustainability and Carbon Certification

### About this Summary Audit Report

All ISCC audits are conducted based on the applicable ISCC requirements as laid down in the ISCC System Documents. The relevant ISCC requirements are specified in audit procedures (checklists) that have to be used by auditors from the Certification Bodies (CBs) for ISCC audits. The completed audit procedures are available to the CB, the certified company and ISCC. Based on the audit procedures the CB prepares and submits this Summary Audit Report to ISCC and the certified company. The Summary Audit Report is published on the ISCC website together with further information on the ISCC certificate. The report is a tool to further enhance the transparency of the ISCC sustainability certification. It provides an overview on relevant aspects and results of the audit of a certified ISCC System User. Information and data in the report reflect the situation at the date of the audit. Only such activities, processes or materials relevant for the ISCC audit shall be included in this Summary Audit Report. The report shall not contain confidential or business sensitive information or data, including data about amounts or volumes of material, names and/or addresses of subcontractors or service providers, clients, customers, or others. Therefore, data on volumes of sustainable material is provided on a voluntary basis only. The Summary Audit Report has to be provided for all ISCC certified System User, and the publication on the ISCC Website is mandatory.

The layout of this report is provided by ISCC to enable a harmonised approach and to foster the comparability. The CB is responsible for correctness of the information provided. The initial template of this Summary Audit Report was compiled in 2016/2017 in a multi-stakeholder process in the framework of a working group of members of the ISCC Association (ISCC e.V.). For all audits conducted since October 2017 the issuing of the report has been mandatory. The members of ISCC e.V. revised the template of the report in the second half of 2018.

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## 1 About ISCC

ISCC – International Sustainability and Carbon Certification – is a solution provider for sustainable and deforestation free supply chains. It is a globally leading certification system covering the entire supply chain and all kinds of bio-based feedstocks and renewables. ISCC certification ensures compliance with high ecological and social sustainability requirements, greenhouse gas emissions savings and traceability throughout the supply chain. A multi-stakeholder dialogue is the basis for the development and continuous improvement of the ISCC system.

The system offers certification for all elements of the supply chain from agriculture or point of origin up to the end user. ISCC certification can be applied for all markets, including bioenergy, food, feed and chemical/technical applications (e.g. bioplastics or cosmetics).

ISCC certification ensures that

- Biomass is not produced on land with high biodiversity and high carbon stock
- Good agricultural practices protecting soil, water and air are applied
- Human rights, labour and land rights are respected
- Sustainable material is traceable throughout international supply chains
- Greenhouse gas reduction targets are met (e.g. for European biofuels markets)

ISCC certifications are conducted by independent third-party Certification Bodies (CB) cooperating with ISCC. Competent and trained auditors, evaluating compliance with the ISCC sustainability standard, conduct the audits.

## 2 Information on the Certification Body

Name of CB:	PCU Deutschland
Description and additional information:  (e.g. relevant recognitions or accreditations, authorities responsible for recognition, accreditation, surveillance and/ or monitoring)	CB registration number: DE-B-BLE-BM-Zst-105 CUC Germany GmbH is certification body for ISCC-DE, ISCC-EU and ISCC-Plus since 2010, amongst many more certification schemes for sustainability. CUC Germany is accredited for ISO 17065, and directly entitled by German Federal Office for Agriculture and Food for RED schemes and EU organic.
CB email:	berlin@controlunion.com
CB website:	www.controlunion-germany.com

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### 3 System User and Audit Process

#### 3.1 ISCC System User (Operational Site Registered for Certification)

Company name	Greenenergy USA Inc.		
Address	Greenway Plaza 9 - 77046 Houston, Texas		
Country	United States		
Contact details of relevant department	+1 832-831-8887		
Date of the audit	03.03.2020		
Place of audit if different from address stated above (only applicable for traders and traders with storage)	9 Greenway Plaza Suite 1260, Houston TX, 77046		
Certification system(s) audited	ISCC EU <input checked="" type="checkbox"/>	ISCC PLUS <input type="checkbox"/>	ISCC DE <input type="checkbox"/>
Chain of custody option applied	Mass Balance <input checked="" type="checkbox"/>		Segregation <input type="checkbox"/>
Year of first ISCC certification	2013		
Other sustainability certification system(s) used*	Yes <input checked="" type="checkbox"/>		No <input type="checkbox"/>
	RFS2 - Renewable Fuel Standard (version 2) If yes, please specify		
Date of issuance of this Summary Audit Report			

\* Please only list systems with comparable scopes

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Scope certified (please tick all applicable boxes)	<input type="checkbox"/> Farm/Planation	<input type="checkbox"/> First Gathering Point	<input type="checkbox"/> Central Office (Farms/ Plantation)	<input type="checkbox"/> Central Office (Independent Smallholders)
	<input type="checkbox"/> Central Office (Points of Origin)	<input type="checkbox"/> Point of Origin	<input type="checkbox"/> Collecting Point	<input type="checkbox"/> Warehouse
	<input type="checkbox"/> Logistic Centre	<input type="checkbox"/> Trader with storage	<input checked="" type="checkbox"/> Trader	<input type="checkbox"/> MTBE Plant
	<input type="checkbox"/> ETBE Plant	<input type="checkbox"/> Processing Unit: Please specify below		
	<input type="checkbox"/> Oil Mill	<input type="checkbox"/> Crushing Plant	<input type="checkbox"/> Refinery	<input type="checkbox"/> Biodiesel Plant
	<input type="checkbox"/> HVO Plant	<input type="checkbox"/> Co-Processing	<input type="checkbox"/> Sugar Mill	<input type="checkbox"/> Ethanol Plant
	<input type="checkbox"/> Biogas Plant	<input type="checkbox"/> Biomethane Plant	<input type="checkbox"/> Methanol Plant	<input type="checkbox"/> Pulp Mill
	<input type="checkbox"/> Treatment Plant (waste/residues)	<input type="checkbox"/> Melting Plant	<input type="checkbox"/> Pyrolysis Plant	<input type="checkbox"/> Other processing unit
	If other processing unit is selected please specify:			
	Is the processing unit producing final biofuels?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
If yes, was the processing unit already in operation on or before 5 October 2015?		Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Voluntary Add-ons (if applicable)	<input checked="" type="checkbox"/> No add-ons applied	<input type="checkbox"/> Environmental Management and Biodiversity	<input type="checkbox"/> Classified Chemicals	<input type="checkbox"/> SAI Gold
	<input type="checkbox"/> GHG Emissions	<input type="checkbox"/> Consumables	<input type="checkbox"/> Non-GMO for Food and Feed	<input type="checkbox"/> Non-GMO for Technical Markets

### 3.2 CB Audit Team

Name of lead auditor:	Jonathan Leonard
Name(s) of further auditors of the team	Not Applicable
Name of GHG expert*	No GHG expert used - trader does not calculate GHG

\* Only relevant if individual GHG calculation is applied

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### 3.3 Risk Assessment

Result of the risk assessment	<input checked="" type="checkbox"/> Regular	<input type="checkbox"/> Medium	<input type="checkbox"/> High	
Major risk indicator(s) identified	Different measurement methodologies being used to general volumes (addressed in management review)			
Tools and sources used to determine risk factor	Inbound/outbound packets from suppliers, documentation provided by the storage terminal, invoices, Waste Feedstock declarations, assessment of the ERP system (Triple Point - TPT)			
Risk level applied for traceability	<input checked="" type="checkbox"/> Regular	<input type="checkbox"/> Medium	<input type="checkbox"/> High	
Sampling applied during the audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" was selected, please answer the following four questions			
Scope(s) audited based on a sample	<input type="checkbox"/> Smallholders, Farms/ Plantations <input checked="" type="checkbox"/> n.a.	<input type="checkbox"/> Points of Origin <input checked="" type="checkbox"/> n.a.	<input type="checkbox"/> Storage Facilities <input checked="" type="checkbox"/> n.a.	<input type="checkbox"/> Dependent Collecting Points <input checked="" type="checkbox"/> n.a.
Risk level applied for sampling (Please tick for applicable samples)	<input type="checkbox"/> Regular <input type="checkbox"/> Medium <input type="checkbox"/> High	<input type="checkbox"/> Regular <input type="checkbox"/> Medium <input type="checkbox"/> High	<input checked="" type="checkbox"/> Regular <input type="checkbox"/> Medium <input type="checkbox"/> High	<input type="checkbox"/> Regular <input type="checkbox"/> Medium <input type="checkbox"/> High
Total number(s) of operations relevant for calculating the sample size	Smallholders: Farms or Plantations: Points of Origin: Storage Facilities: 1 Dependent Collecting Points:			
Number(s) of audits based on sampling	Smallholders: Farms or Plantations: Points of Origin: Storage Facilities: Dependent Collecting Points:			

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### 3.4 Summary of Activities

Amount of sustainable input material (in mt)*	(This information can be provided on a voluntary basis as this may be commercially sensitive information)		
Raw materials with country of origin*	Used cooking oil (UCO) entirely of veg. origin - United States		
Sustainable output material*	Used cooking oil (UCO) entirely of veg. origin		
Please indicate the type(s) of sustainable materials traded (applicable for the certification of traders only)	<input checked="" type="checkbox"/> Raw materials	<input type="checkbox"/> Intermediate products	<input type="checkbox"/> Final products
Type(s) of agricultural producers supplying sustainable biomass**	<input type="checkbox"/> Smallholders <sup>1</sup>	<input type="checkbox"/> Individual farms	<input type="checkbox"/> Plantations
Total number of agricultural producers supplying sustainable biomass**			
Total agricultural production area of all producers supplying sustainable biomass (in ha)**	<input type="checkbox"/> 1 – 500 <input type="checkbox"/> 500 – 5,000 <input type="checkbox"/> 5,000 – 20,000 <input type="checkbox"/> > 20,000	<input type="checkbox"/> 1 – 500 <input type="checkbox"/> 500 – 5,000 <input type="checkbox"/> 5,000 – 20,000 <input type="checkbox"/> > 20,000	<input type="checkbox"/> 1 – 500 <input type="checkbox"/> 500 – 5,000 <input type="checkbox"/> 5,000 – 20,000 <input type="checkbox"/> > 20,000
Countries of smallholders, farms and plantations covered by certification**			
Supplying Farm(s) controlled by European Cross Compliance**	Yes <input type="checkbox"/> No <input type="checkbox"/> Note: If supplying farms were controlled by European Cross Compliance (CC) only ISCC Principle 1 was verified at the audit. ISCC Principles 2 – 6 are covered by the Cross Compliance controls.		
Information on volumes supplied by agricultural producers or points of origin (in mt per raw material)***	(To be provided on a voluntary basis as this may be commercially sensitive information. For agricultural producers of oil palm fresh fruit bunches this information is compulsory)		

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GHG option applied for outgoing sustainable material (Mandatory for ISCC EU and ISCC DE. Multiple options possible)	<input checked="" type="checkbox"/> Total default value	<input type="checkbox"/> Disaggregated default value
	<input type="checkbox"/> Actual value	<input type="checkbox"/> NUTS2 value or "NUTS2-equivalent" value
<input type="checkbox"/> Voluntary add-on "GHG Emissions" was not applied (only relevant for ISCC PLUS)		

- \* Applicable for physical input and output. Not applicable for material which is only traded on a "paper" basis
- \*\* Applicable for certification of First Gathering Points, Central Offices (farms/ plantations), Central Offices (independent smallholders) and individual certified farms/plantations
- \*\*\* Applicable for certification of First Gathering Points, Central Offices and Collecting Points
- <sup>1</sup> Smallholders are farmers growing a cash crop alongside other subsistence crops on areas usually smaller than 50 ha. The smallholding farm generally provides the main source of income for the family owning the land, and the family usually conducts most of the labour
- <sup>2</sup> "NUTS2-equivalent" values: GHG values for cultivation in a "NUTS2-equivalent" region of a country outside the European Union (values are implemented by the European Commission)

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### 3.5 Summary of Audit Results

Audit results per chapter of the ISCC Audit Procedures:

Chapter	Number of mandatory improvement measures (for main and sample audits)	Number of voluntary improvement measures (for main and sample audits)
Management System		
Traceability		
Mass Balance		
Physical Segregation		
GHG		
Farms / Plantations:		
ISCC Principle 1	Violations of ISCC Principle 1 are critical non-conformities and cannot be subject to corrective measures	
ISCC Principle 2		
ISCC Principle 3		
ISCC Principle 4		
ISCC Principle 5		
ISCC Principle 6		
Point of origin		
Status of mandatory improvement measures	<input type="checkbox"/> Implemented <input type="checkbox"/> Not implemented <b>Note: Under ISCC all non-conformities with mandatory requirements must be implemented before a certificate can be issued</b>	
Status of voluntary improvement measures	<input type="checkbox"/> Fully implemented	<input type="checkbox"/> Partially implemented
	<input type="checkbox"/> Not (yet) implemented	<input type="checkbox"/> No voluntary improvement measures defined
Remarks, observations of best practices and suggestions for voluntary improvement relevant for ISCC audit	The outsourced storage facility has been removed from the scope of the certificate. It is now a purely paper trading operation.	



### 3.6 Description of Scopes

This chapter contains a description of the scopes that were subject to the audit. (Note: ISCC will develop a technical solution so that the auditor can choose the text boxes with the description of the relevant scope(s).)

#### **Farm/ Plantation**

Farms or plantations according to this standard are agricultural operations where crops are cultivated sustainably, or where agricultural crop residues from sustainable cultivation occur. A farm or plantation is either defined as distinct legal entity or as an organisation managing an agricultural operation, and having control regarding compliance with the ISCC requirements. The audit of a farm or plantation must always cover the entire land (agricultural land, pasture, forest, any other land) of the farm or plantation, including any owned, leased or rented land. Farms or plantations have three options to be covered under ISCC certification: as group of supplier to a First Gathering Point, as part of an independent group of farms/plantations organised under a Central Office, or through individual certification.

Biomass produced on land that is in compliance with the ISCC Principles 1 to 6 is considered to be sustainable:

1. Protection of land with high biodiversity value or high carbon stock
2. Environmentally responsible production to protect soil, water and air
3. Safe working conditions
4. Compliance with human, labour and land rights
5. Compliance with laws and international treaties
6. Good management practices and continuous improvement

The sustainability criteria are divided in major and minor musts. For a successful audit all major musts and at least 60% of all minor musts have to be fulfilled. The criteria of principle 1 are all major musts. For farms within EU Member States that have fully implemented Cross Compliances only Principle 1 has to be checked during the audit. For countries that have ratified the core ILO Standard Conventions, it may be assumed that the social requirements (ISCC Principle 4) are fulfilled. However, the verification is subject to the auditor's risk assessment.

Farms or plantations do not need to operate a mass balance system or quantity bookkeeping in the case of physical segregation. However, chain of custody requirements include the documentation of origin and the verification that the yield per hectare times field size in hectare is in line with the related quantity of crops stored and delivered as either sustainable or non-sustainable (plausibility check). If farms/plantations calculate individual GHG emissions the GHG calculations have to be included in the audit.

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### Point of Origin

Points of origin (PoO) for waste or processing residues are operations where the waste or residue either occurs or is generated. In case of agricultural crop residues the PoO is a farm/plantation. For other types of waste or residues further categories of PoO are distinguished: business and companies (e.g. restaurants, food processors), private households, community (municipal collection and land fill sites and public containers. PoOs provide a signed self-declaration to the certified collecting point. A sample of PoO generating on average more than 10 metric tons per month of a specific waste or residue (or more than 120 metric tons per year) must be audited in the scope of the audit of the collecting point. PoOs may obtain an individual or group certification on a voluntary basis.

The audit includes an assessment of the materials and the verification of the traceability as well as GHG requirements.

### Central Office

A central office is the representative body of at least one group of homogeneous farms or plantations that are certified as an independent group of agricultural producers. A group is regarded as homogeneous if all the farms or plantations are located in the same area, and are similar in their size, cultivated crops and production processes. The central office is responsible for the group management, i.e. the implementation of the internal management system, the compliance with the ISCC requirements of the individual members of the group, and for carrying out the internal audits of the group members. Each group member has to provide a signed a self-declaration/-self-assessment form to the central office before the first delivery of sustainable biomass. The certificate is issued for the central office based on a successful audit. A sample of the group members is subject to an on-site audit. The central office is responsible for the determination of the greenhouse gas emissions of the group. The central office has to keep a quantity bookkeeping system on the basis of the outgoing Sustainability Declarations.

### First Gathering Point

First gathering points (FGP) are economic operators that receive or buy the sustainable crops or agricultural crop residues directly from the farms or plantations. FGPs have a contractual relationship with the supplying farms or plantations for the delivery of crops or agricultural crop residues and receive a signed self-declaration/ self-assessment form from each farm or plantation before the first delivery of the sustainable biomass. They have to conduct internal audits at their supplying farms or plantations. An important characteristic of a FGP is the task of determining and documenting the incoming biomass according to its origin, quality, amount and greenhouse gas emissions for cultivation. A FGP is responsible for the correct determination of the GHG emissions for the incoming biomass, and is responsible for verifying whether specific options to state greenhouse gas emissions (e.g. disaggregated default value for cultivation or NUTS2 values) can be applied. FGPs are audited regarding the requirements of the management system, traceability, chain of custody and greenhouse gas emissions. A sample of

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all farms or plantations that have signed a self-declaration is subject to an audit. At least one farm or plantation has to be audited in the scope of the certification of a FGP.

Collecting facilities used by several farms during harvesting periods, and which are equipped with a mobile weighbridge are not regarded as a FGP. The same applies to storage facilities that do not hold contracts and self-declarations for farms or plantations, but store material at the request of a FGP. A sample of these dependent storage facilities is subject to an audit in the scope of the certification of the FGP.

### Collecting Point

The collecting points of waste and residues are economic operators that collect or receive waste and residue materials directly from the points of origin. Collecting points either sell, distribute or process the collected waste and residues. Collecting points are responsible for the correct declaration and documentation of the types and amounts of collected materials. Collecting points have to receive a signed self-declaration from each point of origin to receive material as sustainable. Collecting points receive a certificate upon a successful audit. They will be audited regarding their management system, traceability, chain of custody and GHG requirements.

A sample of (not individually certified) points of origin generating on average more than 10 metric tons per month of a specific waste or residue (or more than 120 metric tons per year) must be audited in the framework of the audit of the collecting point.

Economic operators that collect waste and residues only on behalf of a collecting point are regarded as dependent collecting points and do not need to be certified individually but have to be audited on a sample basis in the scope of the audit of the collecting point. The same applies for storage facilities that only act on demand of the collecting point. A sample of such storage facilities has to be audited in the scope of the certification of the collecting point.

### Processing unit

Processing units are facilities that convert input materials by changing their physical and/or chemical properties. Processing units can be oil mills, refineries, biodiesel, ethanol plants and others. Collection points or storage facilities conducting a mechanical filtration or sedimentation (e.g. of used cooking oil with the goal of removing contaminants such as bones, cutlery, etc. or to reduce the water content of the used cooking oil) are not regarded as processing units. This applies, if both the raw materials and the materials after the mechanical treatment can be classified and declared with identical waste codes. Facilities that only blend biofuels and bioliquids, such as ETBE or MTBE plants, are not regarded as processing units either. Group certification or sampling is not allowed for processing units and blending facilities. The audit of a processing unit covers the relevant requirements of their management system, traceability, chain of custody and GHG emissions.

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### MTBE or ETBE plants

MTBE and ETBE plants receive biomethanol or bioethanol which are already considered final products. From those input materials together with fossil inputs the plants produce MTBE or ETBE. MTBE and ETBE plants are not considered conversion units but they require individual certification. Group certification and sampling is not allowed. They will be audited regarding, traceability and chain of custody (mass balance) requirements.

### Trader and Storage Facilities, Logistic Centres

Traders and storage facilities are economic operators that trade and/ or store sustainable materials (raw materials, intermediate products or final products). Storage facilities include warehouses, silos, tanks etc. A logistics centre is an economic operator that operates and manages a group of storage facilities under a single legal entity at different geographical sites but with a corporate management system. A storage facility can be the owner of the sustainable material or store or transfer the sustainable material on behalf of the owner.

All traders and storage facilities trading or storing sustainable materials must be covered by certification. For storage facilities three options can be applied: individual certification as a storage facility (warehouse), certification as part of a group under a Logistic Centre, or covered by certification of a third party (e.g. First Gathering Point, Collecting Point, processing unit, trader with storage)

Traders, independent storage facilities and logistic centres receive a certificate upon a successful audit. Trader and storage facilities are audited regarding their management system, traceability and chain of custody requirements. For the certification of a third party with storage facilities and logistics centres, a sample of all storage facilities has to be audited. The requirements regarding the traceability and chain of custody apply for every storage facility, i.e. a separate quantity bookkeeping calculation has to be kept for every storage facility. The logistics centre or the certified third party using a storage facility is responsible for keeping a separate quantity bookkeeping for each storage facility.

If a trader uses storage facilities that are individually certified or certified as part of a logistic centre, these storage facilities do not have to be included in the sample.