

REDCERT STATEMENT

Preventing circumvention of certification requirements by changing the voluntary scheme

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REDcert-EU stands for credible, transparent, and risk-oriented sustainability certification. The switch to another voluntary scheme recognized by the European Commission shall not be used to circumvent certification or control requirements resulting from the actual activity of an economic operator, its function in the supply chain and the materials provided.

This applies in particular to refineries and similar industrial processing plants that produce waste or residues from the processing of vegetable or animal oils and fats. Where such a plant is classified in another recognized voluntary scheme as an individually point of waste origin or 'point of origin' due to its activity or material flows, this requirement shall not be circumvented by a self-declaration, a group certification or the intermediation of a collector.

ISCC's publicly available requirements clearly state that all refineries supplying waste or residue materials under ISCC must be individually certified under the "Point of Origin" scope, irrespective of the type of oil refined or the physical state of the material.

Relevant material flows from refining processes

Liquid or oil-containing waste and residues can generated both during individual refining steps and in the course of a complete refining process. These include in particular:

- mucilages and lecithin fractions from degumming,
- Soap stock from chemical neutralization,
- free fatty acids and fatty acid fractions,
- distillates from physical refining or deodorization, including fatty acid distillates,
- used bleaching earth oil and recovered oily fractions,
- oil-containing tank and refining sludge, and
- other liquid, fatty waste or residue fractions from the purification, separation, distillation, filtration or treatment of oils and fats

The classification as waste or residue does not depend solely on the description of the material. The actual generation process, the material properties, and the verifiable fulfilment of the legal and system-related requirements at the place of origin are decisive. Technical names, trade names or subsequent treatments shall not veil the origin of the material or the actual function of the point of origin.

The actual function of the processing plant is the decisive factor.

The assessment of a certification model under REDcert-EU shall take into account:

- the actual operational activities at the place of origin,
- the raw materials used and the refining steps or industrial processes carried out,
- previous or existing certifications in other voluntary schemes,
- the reasons for the change of system,
- the full structure of the upstream supply chain,
- the possibility of effective on-site audits, and
- existing risks of fraud, risk of mixing, and false declaration

The formal designation of an operation as a generating plant, waste treatment plant, or group member is not decisive. The processes actually carried out and the materials resulting from them are decisive.

Therefore, a refinery or oil mill must not be treated as an ordinary point of origin that is not individually certified merely because it operates under a different designation, forms part of a group structure, or involves an intermediary collector, group manager or affiliated company. Organizational structures shall not affect traceability, auditability, or responsibility for sustainability of documents issued.

Position of REDcert

REDcert-EU does not accept any registration or certification arrangement whose purpose or apparent effect is to circumvent an individual certification or equivalent on-site verification required due to the activities actually performed under another recognized voluntary scheme.

A switch to REDcert-EU does not create any entitlement to include an industrial point of origin by means of a self-declaration or group certification. This also applies where the proposed arrangement can formally be assigned to a scope of the REDcert-EU scheme.

Where there are indications of potential circumvention, REDcert-EU may, in particular:

- require additional information on supply chains and points of origin,
- request evidence relating to processes and materials,
- review previous or existing certifications,
- require individual certification or additional on-site verifications, including retrospective verifications,
- exclude certain materials or certification arrangements on the basis of a risk assessment, or
- reject the admission of a potential system participant.

The assessment is always carried out on a case-by-case basis. Economic operators, certification bodies and auditors must fully, clearly and truthfully disclose the activities actually performed, the material flows and the supply chain structures.

REDcert-EU therefore does not support arrangements that allow refineries, oil mills or comparable industrial points of origin to avoid the required level of transparency and control through group structures, intermediary collecting points or the formal transfer of the certified contractual partner.