

Name scheme: ISCC EU

Reference sources

- https://www.iscc-system.org/wp-content/uploads/2017/02/ISCC_202_Sustainability_Requirements_3.0.pdf (ISCC 202, Sustainability requirements , Version 3.0, Aug 2016)
- https://www.iscc-system.org/wp-content/uploads/2017/02/ISCC_205_GHG_Emissions_3.0.pdf (ISCC 205, Version 3.0, Aug 2016)
- https://www.iscc-system.org/wp-content/uploads/2017/02/ISCC_EU_Procedure_Farm_Plantation_v4.0-1.pdf (Audit procedures for farm/plantation; Version 4.0, Jan 2019)
- <https://www.iscc-system.org/wp-content/uploads/2017/02/System-Documents-203-Traceability-and-Chain-of-Custody.pdf> (Version 3.1, Jan 2019)
- https://www.iscc-system.org/wp-content/uploads/2017/02/ISCC_205_GHG_Emissions_3.0.pdf

3	Strong
2	Good
1	Medium
0	Weak / non-compliant / non-existent / missing
n.a.	Not applicable / relevant

Main questions	Subsidiary questions	Scheme requirements	Score
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Process to ensure protection of Biodiversity

Requirements prior to significant intensification or expansion of cultivation, infrastructure or processing;

Does the standard require the identification of biodiversity values that would be potentially affected by operations, and the assessment of potential impacts on those biodiversity values?		"The objective of ISCC is to protect areas which are biodiverse or rich in carbon, which serve the protection of threatened or vulnerable species, or which have other ecological or cultural importance. Furthermore, high conservation value (HCV) areas shall be protected."((ISCC EU 202: Principle 1, p. 8); " Biomass is not produced on land with high biodiversity value"; "Biomass is not produced on land with high carbon stock"; "biomass is not produced on peatland" (ISCC EU Audit Procedure Farm);	2
	Does the standard reference HCV (High Conservation Values)?	Yes	
	Requirement for HCV assessment prior to development?	Yes, "Is it ensured, that biomass is not obtained from land that in or after January 2008 had the status of forestland?"; "Compare the farmland areas with the protected areas listed in the IUCN Database. The HCV tool also covers further important ecosystems and species, ecosystem services and community livelihoods as well as cultural values. Compare farmland with potential HCV-areas and if HCV-criteria have been followed in the identification of land status." (ISCC EU Audit Procedure Farm 07.01)	
	Requirement that HCV assessment comply with HCVRN ALS quality control?	Yes	
	Does the standard require use of the HCSA (High Carbon Stock Approach) which provides a measure of protection for Biodiversity ?	Yes	
	Requirement for High Carbon Stock Approach (HCSA) assessment, or combined HCV/HCSA assessment prior to development?	Yes, The requirements have been aligned to Articles 17(3), 17(4) and 17(5) of the amended RED and Articles 7b(3), (4) and (5) of the amended FQD amended by the Directive 2015/1513/EC. "The HCV tool also covers further important ecosystems and species, ecosystem services and community livelihoods as well as cultural values. Compare farmland with potential HCV-areas and if HCV-criteria have been followed in the identification of land status." (ISCC EU Audit Procedure, 07.01.04)	
	Requirement that HCSA assessment be undertaken in compliance with the HCV/HCSA Assessment Manual or HCSA toolkit?	Yes, requires compliance with HCV tool	

	Does the standard require other robust forms of assessment prior to development that have a biodiversity protection component e.g. EIA, land use baseline assessments or other studies?	"Is it ensured, that no cultivation occurred on areas that serve the purpose of nature protection unless the nature protection aims are not endangered?"; "Is it ensured, that the regulations for areas that serve the purpose of the protection of rare, threatened or vulnerable ecosystems or species, or areas for the protection of rare, threatened or endangered ecosystems or species recognized by international agreements or included in lists drawn up by intergovernmental organizations or the International Union for the Conservation of Nature are followed?"; "Is it ensured, that biomass is not obtained from land that in or after January 2008 had the status of highly biodiverse grassland?"; "biomass is not obtained from land that in or after January 2008 had the status of wetland and no longer has the status"; "biomass is not obtained from land that in or after January 2008 had the status of continuously forested areas and no longer has the status"; "biomass is not produced on land that was peatland in January 2008 or thereafter" (ISCC EU Audit Procedure Farm);	
	If other forms of assessment are followed, do they require licensed experts, stakeholder consultation and public reporting?	Yes, "The assessments shall be based on a combination of field and desk work. An exception is possible if desk based evidence is used to show that the land must be regarded to be highly biodiverse grassland. Assessments should be based on assessing information from appropriate databases and/or the application of assessment tools. Consultation of local stakeholders may also be required." (ISCC EU 202: p.57).	
	Are these assessments and studies required to assess values and impacts both inside the management unit and beyond its boundaries?	No, Reference for auditing farm land "the entire land (agricultural land, pasture, forest, any other land) of the farm including any owned, leased or rented land." (ISCC 202: p. 8)	

Does the standard require identification of measures to maintain or minimize and mitigate negative impacts from operations on biodiversity values?		Yes, "Negative impacts must be avoided or, if this is not possible, minimised, restored and/or compensated. Documents of regular meetings with communities (with two-way communication) and local government with listed risks and/or impacts and evidence of minuted negotiations or resolution processes must be compiled." (ISCC EU: p. 35). "If any of the activities took place at the farm, an impact assessment must be available to show that environmental impacts have been considered and negative impacts have been kept as little as possible. (a) Human beings, fauna and flora; (b) Soil, water, air, climate and the landscape; (c) Material assets and the cultural heritage; (d) The interaction between the factors referred to in points (a), (b) and (c). (see ISCC 202 2.1.1)"; "Is it ensured, that no cultivation occurred on areas that serve the purpose of nature protection unless the nature protection aims are not endangered?"	2
	Is there a requirement to develop Biodiversity Action Plan, Integrated Conservation and Land Use Plan (ICLUP) or equivalent management and monitoring plans?	Partly covered, "Is it ensured, that an environmental impact assessment is conducted prior to implementing one of the following actions?"; "Is it ensured that damage or deterioration of habitats is avoided?"(ISCC EU Audit Procedure Farm 07.01); "check whether appropriate management measures to avoid damage or deterioration of any important habitats or species have been identified and implemented. Any legal requirements relating to the protection of species and habitats must be met." (ISCC EU Audit Procedure Farm 07.01)	
	Does the standard explicitly prohibits or at least mentions "no excision of non productive/ conservation areas" from PO concessions to ensure concession holders do not avoid responsibility for actively managing and protecting HCV areas and to avoid reallocation of excised areas for development by uncertified producers?	Partly covered. The standard does not focus on PO solely, but states that developers should take active management of HCV areas into consideration and not solely exclude them from the concessions.	

Does the standard specify any particular measures to be applied in given circumstances to minimize and mitigate negative impacts from operations on biodiversity values?		All requirements under principle 1 in ISCC EU Audit Procedure Farm document refer to measures for mitigating and minimizing negative impacts from operations on biodiversity values. "Compliance with national and local laws and regulations relevant to soil degradation, soil preservation, soil management, contamination and depletion of water sources, water quality, air emissions and burning practices is required. Good Agricultural Practices shall be applied."	2
	Does the standard have requirements on minimum areas to "set aside" as conservation areas?	No, buffer zone areas are defined only. "Around all protected areas (covered in Principle 1), set aside land or wildlife corridors, appropriate buffer zones shall be protected, restored or set up. Buffers include: riparian buffers, filter strips, grassed waterways, shelterbelts, windbreaks, living snow fences, contour grass strips, cross-wind trap strips, shallow water areas for wildlife, field borders, alley cropping, herbaceous wind barriers, and vegetative barriers." (ISCC EU Audit Procedure Farm)	
	Does the standard have requirements on buffer zones (e.g. around sensitive sites including nesting & breeding sites, water courses, and steep slopes, etc.)?	The requirement for buffer zones is clearly defined for watercourses and soil degradation: "Natural watercourses can be streams, rivers, canals or other routes, through which constantly or ephemeral/intermittent water flows, regardless of whether they are still unaffected by human intervention or corrected, straightened or otherwise regulated. The producer knows the status of riparian vegetation around springs and natural watercourses." (ISCC EU 202: p.18).; "Appropriate management measures to improve water quality should be documented. They could include, inter alia, setting up buffer zones around water bodies" (ISCC EU 202: p. 29). "Appropriate riparian buffer zones to protect watercourses and wetlands are set up, maintained and restored, taking into consideration crop planting, the application of fertilisers and plant protection products and harvesting. Where natural vegetation in riparian areas has been removed there is a plan with a timetable for recovery." (ISCC EU 202: p. 18)	

Requirements after expansion of cultivation or infrastructure - for existing plantations, infrastructure and processing operations;

Does the standard require regular monitoring and reporting on implementation of plans for biodiversity conservation?		"Establishment of a recording system for each unit of production"; "Commitment of continuous improvement for each unit of production"; "Records are kept for the description of the areas in use" (ISCC EU Audit Procedure Farm 07.01);	0
	Does the standard include provisions to ensure transparency and stakeholder engagement on monitoring the implementation of plans for biodiversity conservation?	No	
Does the standard require regular monitoring of actual impacts on biodiversity and adaptive management as necessary for improvement?		"The producer can show evidence of implementation of at least one activity that falls into the category of "observation and monitoring" (ISCC EU 202: p. 47); "Monitoring which is appropriate to scale demonstrates that applied practices are effective (e.g. by monitoring the biological oxygen demand (BOD) or heavy metals and other contaminants in order to monitor water quality management measures)." (ISCC EU 202: p. 29); "Records of the risk assessment as well as appropriate monitoring and management measures must be kept for at least five years. A comprehensive, current, documented plan that covers wastage reduction, pollution and waste recycling must be available. Air, soil, water, noise and light contamination must be considered." (ISCC EU 202: p. 30);	1

Does the standard include provisions to ensure transparency and stakeholder engagement on biodiversity impact assessment ?	ISCC 202, 4.1.2 [...]A participatory social impact assessment should be conducted, where all relevant stakeholders including local communities and indigenous people are engaged. The report is publicly available in a language appropriate to surrounding communities. On the basis of that report, an action plan to address
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Habitat loss and degradation

Is the standard explicit in requiring the protection of all natural ecosystems that are important for species survival?	"Biomass is not produced on land with high biodiversity value: Primary forests and other wooded land; Areas designated by law or by the relevant competent authority for nature protection purposes; Areas for the protection of rare, threatened or endangered ecosystems or species (areas that are recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature (IUCN)); Highly biodiverse grassland"; "Biomass is not produced on land with high carbon stock: Wetlands, Continuously forested areas, Other (sparsely) forested areas"; "Biomass is not produced on peatland" (ISCC EU 202: p. 14)	2
Does the standard specify which types of ecosystems might be important for species survival? e.g. <i>Primary forest, Biodiverse secondary forests, Wetlands, Riparian zones, Savannah woodlands and natural grasslands, Natural water bodies</i>	Yes, "Raw material shall not be obtained from land with high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status: primary forests and other wooded land, areas designated by law or by the relevant competent authority for nature protection purposes, areas for the protection of rare, threatened or endangered ecosystems or species, highly biodiverse grassland" (ISCC EU 202: p.11 - 14). "Raw material shall not be obtained from land with high carbon stock, namely land that had one of the following statuses in January 2008 and no longer has this status: wetlands, continuously forested areas, other (sparsely) forested areas" (ISCC EU 202: p.14-16). "Biomass is not produced on peatland" (ISCC EU 202: 16)	
Does the standard require that such areas appropriately defined by organization(s) with specialist expertise?	ISCC EU 202, Annex 2 guidance for highly biodiverse grasslands describes requirements for expert for that topic. No further info on other experts.	
Does the standard require a consistent and complete identification of such areas on the ground prior to development of the management unit?	Yes	
Does the standard allow for distinguish between different types of secondary forests according to their value for biodiversity protection?	To some extent yes. The standard makes a clear distinguishment between continuously forested areas and other (sparsely) forested areas	
Does the standard preclude the conversion of natural ecosystems that are important for species survival i.e. rare, threatened or endangered ecosystems to palm oil production?	Yes, "Biomass is not produced on land with high biodiversity value: Primary forests and other wooded land; Areas designated by law or by the relevant competent authority for nature protection purposes; Areas for the protection of rare, threatened or endangered ecosystems or species (areas that are recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature (IUCN)); Highly biodiverse grassland"; "Biomass is not produced on land with high carbon stock: Wetlands, Continuously forested areas, Other (sparsely) forested areas"; "Biomass is not produced on peatland" (ISCC EU 202: p. 14). The standard does not refer directly to PO.	
What historic cut-off dates apply for conversion of such ecosystems to be eligible for certification?	Not in/after January 2008	
Does the standard require protection of ecosystems that are identified as rare, threatened or endangered, but have not necessarily been recognised as important for the survival of particular species?	Yes	

Does the standard require protection of ecosystems providing services critical for off site biodiversity conservation?		"Around all protected areas (covered in Principle 1), set aside land or wildlife corridors, appropriate buffer zones shall be protected, restored or set up. Buffers include: riparian buffers, filter strips, grassed waterways, shelterbelts, windbreaks, living snow fences, contour grass strips, cross - wind trap strips, shallow water areas for wildlife, field borders, alley cropping, herbaceous wind barriers, and vegetative barriers. (see ISCC 202 2.1.2)" (ISCC EU Audit Procedure Farm 07.01) Also, "If land use change complies with Principle 1, check whether appropriate management measures to avoid damage or deterioration of any important habitats or species have been identified and implemented. Any legal requirements relating to the protection of species and habitats must be met." (ISCC EU Audit Procedure Farm)	2
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Does the standard exclude any palm oil development in protected areas?		<p>"Check if the farmland is completely or partially situated in nature protection areas. Areas for nature protection purposes comprise areas, which are designated by law or by the relevant competent authority to serve the purpose of nature protection. Compare in European Union Member States the farmland with the biotopes protected by law and Natura 2000 areas. In third countries search for similar laws and designated protection areas. Analyze the World Database on Protected Areas (WDPA), the Integrated Biodiversity Assessment Tool (IBAT) or other databases. The protection purpose and the respective imperatives and interdictions must be followed according to the relevant protected area declaration. As long as a Natura 2000 area has not been placed under protection order, the relevant preservation objectives are authoritative.(see ISCC 202, 1.1.(2))" (ISCC EU Audit Procedure Farm 07.01); "If evidence is provided that the production of the raw material does not interfere with the protection purposes, cultivation is only allowed if appropriate management measures are identified and implemented to avoid damage to or deterioration of habitats. Legal requirements related to the protection of species and habitats must be met, any constraints must be followed and damage to or deterioration of habitats or species is avoided."; "The following geographic ranges of the European Union shall always be regarded as highly biodiverse grassland:</p> <p>(1) Habitats as listed in Annex I to Council Directive 92/43/EEC5; (2) Habitats of significant importance for animal and plant species of Union interest listed in Annexes II and IC to Directive 92/43/EEC; (3) Habitats of significant importance for wild bird species listed in Annex I to Directive 2009/147/EC of the European Parliament and of the Council." (ISCC EU 202: 13)</p>	3
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	<p>How are protected areas defined in the standard?</p> <p>Any distinction between areas protected under national legislation and those covered by an international designation?</p>	<p>Protected areas are defined in line with the EU regulations</p> <p>Strict segregation between national legislations and international regulations is not in place but threatened or endangered species or ecosystems "recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature" (ISCC EU 202: p.5) are taken into consideration.</p>	
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Does the standard require the maintenance of buffer zones around protected areas?		"Around all protected areas (covered in Principle 1), set aside land or wildlife corridors, appropriate buffer zones shall be protected, restored or set up. Buffers include: riparian buffers, filter strips, grassed waterways, shelterbelts, windbreaks, living snow fences, contour grass strips, cross - wind trap strips, shallow water areas for wildlife, field borders, alley cropping, herbaceous wind barriers, and vegetative barriers. (see ISCC 202 2.1.2)" (ISCC EU Audit Procedure Farm 07.01)	3
	Is the requirement limited to buffer zones around areas protected under national legislation?	Yes. The standard outlines well the requirement for a buffer zone, not including scope on national legislations.	

Does the standard require that representative areas of native ecosystems in the management unit be actively conserved?		"Tree species are defined as native, if they grow within their natural geographical range and under climatic conditions to which they have adapted naturally and without human interference. Thus, primary forests and other wooded land consists of tree species that have not been introduced by humans or that, nevertheless would occur nonetheless in the area, e.g. due to the climatic conditions of the region." (ISCC EU Audit Procedure Farm 07.01); Areas defined as high biodiverse value: primary forests and other wooded land, areas designated by law or by the relevant competent authority for nature protection purposes, areas for the protection of rare, threatened or endangered ecosystems or species, highly biodiverse grasslands. The following requirements are included with the purposes of active conservation of native ecosystems: "maintaining a bufferzone" "Is it ensured that damage or deterioration of habitats is avoided?"(ISCC EU Audit Procedure Farm 07.01); "check whether appropriate management measures to avoid damage or deterioration of any important habitats or species have been identified and implemented. Any legal requirements relating to the protection of species and habitats must be met." (ISCC EU Audit Procedure Farm 07.01)	2
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Does the standard incorporate P&Cs that provide positive encouragement to direct socio-economic pressure for PO expansion within a given landscape towards degraded lands that are not critical for species survival?		PO expansion within a given landscape towards degraded lands is not mentioned in the standard.	0
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Habitat fragmentation and connectivity loss

Does the standard require protection of corridors of natural vegetation where these are critical for connectivity between habitats, to avoid fragmentation of ecosystems (e.g. large landscape-level ecosystems/HCV 2 areas)?		ISCC EU, 202, 2.1.2: "Existing ecological corridors and important landscape elements shall be maintained or, if necessary, restored to minimise fragmentation of the protected habitats. This shall take place in accordance with the type of terrain, wildlife and agricultural practices." "Around all protected areas (covered in Principle 1), set aside land or wildlife corridors, appropriate buffer zones shall be protected, restored or set up. Buffers include: riparian buffers, filter strips, grassed waterways, shelterbelts, windbreaks, living snow fences, contour grass strips, cross-wind trap strips, shallow water areas for wildlife, field borders, alley cropping	2
	Does the standard specify or recognise particular methodologies to evaluate ecosystem connectivity and identify critical corridors of natural vegetation?	No	

Direct mortality (of RTE species)

Does the standard include explicit requirements for the protection of rare, threatened or endangered species?

Does the standard require that particular threats considered and mitigated in palm oil production, i.e.

Over exploitation		The audit procedure puts emphases on checking "whether control measures to avoid illegal or inappropriate hunting, fishing, trapping or collecting activities are implemented." (Audit Procedure ISCC EU, 07.01.11) This leads to criteria for avoiding over exploitation)	1
	Does the standard require that measures be taken against any illegal or inappropriate logging, hunting, fishing or collecting in the management unit?	Yes	

	<p>Does the standard cover the use of natural resources at a renewable rate? This could be relevant where there is;</p> <ul style="list-style-type: none"> - Community use of biodiversity reserves - Current irrigated production of palm oil - Potential future climate change pressures driving producers to consider use of irrigation 	<p>No mentioning of renewability of the used natural resources</p>	
<p>Pollution</p>		<p>"Evidence, where fertilizers come from and if the source is trustworthy (e.g. reputable seed producers, cooperatives, neighbours). Verify if a periodic input/output balance of fertilizer application has been conducted. Fertilizer application should be based on this input/output balance and follow professional recommendations, if available. Most efficient fertilizer application is aspired in order to reduce runoff. Evidence that application manuals, the chemical composition, concentration and concentration are considered when applying fertilizers. If organic matter, like Empty Fruit Bunches (EFB) or other remaining plant material is used in the production areas (mulched), the material is evenly distributed.(see ISCC 2.3.1)"; "Verify that fertilizer with a content of more than 1.5% of nitrogen in the dry matter are not applied onto flooded, water logged or frozen soils. Verify if the producer can demonstrate that he observes at least a distance of 3 m to riverbanks etc. and takes care that there is no run-off of applied fertilizer into surface water bodies and the ground water. Check, if the producer examines weather conditions during surface application of fertilizers (e.g. wind speed and direction, temperature) and takes them into account. (see ISCC 202 2.3.2); Raw sewage sludge shall undergo a treatment before used on the fields. The treatment should considerably lower the content of any pollutants like lead, cadmium, chromium, copper, nickel, mercury, zinc and organic-persistent pollutants. Dewatering is not considered a treatment. Treated sewage sludge may only be applied to soils in a way that it does not adversely affect communities, water- or soil quality, the pH of the soil or the nutritional needs of crops. The impacts of applying organic manure, treated sludge and sludge water and/or industrial waste residues shall be kept to a minimum. Where relevant, this might include an assessment on the pollution of ground and surface water, health risks to workers and surrounding communities and an assessment of heavy metals."; "The use of agricultural residues should not jeopardize the function of local uses of the co-products, soil organic matter or soil nutrients balance"; "Complete records of all fertiliser applications are available."; "A soil organic matter balance is compiled (can be generic) or every six years a soil organic matter analysis takes place. Results are kept for seven years."; "Chemicals listed in the Stockholm Convention on Persistent Organic Pollutants shall not be applied on any (own and leased) land of the farm/plantation 10 The use of chemicals</p>	<p>2</p>
	<p>Does the standard provide sufficient controls to prevent pollution from effluent and emissions, through control/minimisation of agro-chemical and pesticide use or requirements for maintenance of buffer zones?</p>	<p>Yes, thorough overview of banned chemicals and waste management. With regards to GHG emissions from mills specific requirements apply for methane capture devices: "Specific requirements for the use of methane capture devices. If a methane capture device, that can guarantee actual methane capture, is run by the unit, e.g. for pre-treatment of wastewater, the following aspects need to be checked and fulfilled:</p> <ul style="list-style-type: none"> > Absorption of total wastewater in a closed system (only short-term storage of fresh wastewater) and supply to a methane capture device, > Use of the produced biogas for energy purposes (see also chapter "Excess electricity"), or in the worst case flaring of the biogas and > The methane capture device is in good condition, leakages are nonexistent, and the producer provides a guarantee about the maximum methane leakage that does not exceed the current state of the technology" (ISCC 205: p. 34). 	

Invasive species		<p>"Check if species or genetically modified variety is officially prohibited in the country of operation. Check if the farm/plantation introduced new plant species that are not already established in the country or region, which show a high risk of invasive behavior. If yes, check if an existing regulatory frameworks are followed for such an introduction. If GM species were cultivated, check any buyer contracts and legal regulation for restriction (e.g. on protection of adjacent farms, wildlife habitats against invasion and cross-pollination) and check if they were followed. Check if traceability and labeling of GM crops are in line with requirements of GM crop recipients or the country of cultivation. (see ISCC 2.1.4)" (ISCC EU Audit Procedure Farm, 07.01). All plant protection products applied must be officially registered in the country of use for the target crop or permitted by the appropriate governmental organisation in the country of application where such official registration scheme exists. Where no official registration scheme exists, reference to the FAO International Code of Conduct on the Distribution and Use of Pesticides is possible; "; "Local restrictions on the use of plant protection products are followed"; "Seed origin is legitimized"; "Invoices for registered plant protection products are kept"; "Avoiding plant protection products by integrated pest management"; (ISCC EU Audit Procedure Farm, 07.01)</p>	2
	Does the standard control for the introduction or use of alien species in the management unit that might adversely affect habitats and bioregions?	Yes	
	In this regard, does the standard require assessment of the risk that bio-control agents may negatively impact rare or endangered species?	Yes, they should be officially registered in the country the are used	
	Does the standard have requirements on the use of genetically modified organisms (GMO)?	Yes	
Anthropogenic introduced disease		<p>"The application of integrated pest management (IPM) helps to minimise typical safety and quality hazards and thereby increase safety and quality of the raw materials. Typical hazards are biological (including infection and cross-contamination), chemical and physical (including foreign matter and cross contamination." (ISCC EU 202: p. 22). "Check, whether all purchased seed and plant material comes from authorities recognized seed producers or from trustworthy sources (e.g. reputable seed producers, cooperatives) and is traceable. If self-bred seed is used, check whether applicable seed production norms are followed and if legal requirements regarding intellectual property rights are met. Check if an informed choice on seed varieties and plant materials, grafting material was made (taking into accounting. yield, disease- and pest resistance, local conditions) (see ISCC 202 2.4.4)" (ISCC EU Audit Procedure Farm 07.01)</p>	2
	Does the standard require bio-security measures to control the risk that pests and diseases introduced as a result of palm oil operations negatively impact RTE species?	<p>"Check if all the plant protection products applied are officially registered or permitted by the appropriate governmental organization in the country of application. Where no official registration scheme exists, check if plant protection products used follow the FAO International Code of Conduct on the Distribution and Use of Pesticides. (see ISCC 202 2.4.2)"</p>	
	In this regard, does the standard require assessment of the risk that bio-control agents may negatively impact RTE species?	Yes	
Fire		<p>"The burning of stubble or other crop residues is only allowed with the permission of a competent authority and if there are no viable alternatives. Burning as part of land clearance is prohibited. When the burning of stubble or other crop residues takes place, it is done in a responsible way (e.g. by considering influencing factors such as wind direction)."</p>	2
	Does the standard control for the use of fire in the management unit?	Yes	

Does the standard require absolute exclusion of fire in the management unit, or does it impose limitations on its use as a management tool?	It imposes limitations	
Does the standard require that a certificate holder mitigate the risk of wildfire in the wider landscape?	No	

Anthropogenic climate change (with indirect impacts on biodiversity)

Does the standard reference HCS (High Carbon Stock) forest?	Yes: "In the following chapters all relevant criteria for the protection of land with high biodiversity value, high carbon stock and peatland are specified."; "Raw material shall not be obtained from land with high carbon stock, namely land that had one of the following statuses in January 2008 and no longer has this status: wetlands, continuously forested areas, other (sparsely) forested Areas" (ISCC EU 202: p. 9).	3
Requirement for High Carbon Stock Approach (HCSA) assessment, or combined HCV/HCSA assessment prior to development? <i>Ref 1.1</i>	Yes	
Requirement that HCSA assessment be undertaken in compliance with the HCV/HCSA Assessment Manual or HCSA toolkit? <i>Ref 1.1</i>	No	
Does the standard require any other robust methodology for the assessment of existing carbon stocks?	No	
Does the standard require the protection of significant carbon stocks?	"The objective of ISCC is to protect areas which are biodiverse or rich in carbon, which serve the protection of threatened or vulnerable species, or which have other ecological or cultural importance. Furthermore, high conservation value (HCV) areas shall be protected." (ISCC EU 202: p. 8)	1
Does the standard define what constitutes a 'significant' carbon stock?	Three categories of high carbon stock land are defined: wetlands, continuously forested areas, other (sparsely) forested areas.	
Does the standard recognise and distinguish between above ground and below ground carbon stock?	It makes a distinction between wetlands and forested areas but not specifically on below and above ground carbon stock.	
Does the standard preclude the conversion of peatland to palm oil production?	"Raw material shall not be obtained from land that was peatland in January 2008 or thereafter and no longer had this status." (ISCC EU 202: p. 16); "biomass is not produced on peatland" (ISCC EU Audit Procedure Farm);	3
Does the clearly standard define peat soils?	"Peatland soils are soils with horizons of organic material (peat substrate) of a cumulative thickness of at least 30 cm at a depth of down to 60 cm. The organic matter contains at least 20 mass percent of organic carbon in the fine soil." (ISCC EU 202: p. 16)	
Does the standard require measures to limit CO2 emissions from peatlands already planted with oil palm?	No specific provisioning on peat into the ISCC 205 document which focuses on GHG emissions. Neither specifically on palm, nor on biomass in general. In the GHG document there is a point concerning "emissions from the extraction or cultivation of raw materials". In ISCC EU 202 there is a point on no planting on peat, but no mentioning of CO2 emissions.	1

	Does the standard require adherence to best management practices to limit drying of peat in the current rotation?	No	
	Does the standard require a time-bound plan to retire PO on peat?	No	
Does the standard require monitoring and control of GHG emissions from land use change?		There is a separate document on GHG emissions - ISCC 205, which outlines the criteria for "The intention of the document "Greenhouse Gas Emissions" is to explain the options of stating greenhouse gas (GHG) emissions along the supply chain and to provide the methodology, rules and guidelines for calculating and verifying GHG emissions and emission reductions."	2
	Does the standard explicitly require measurements of green house gas emissions and calculation of net GHG balance at management unit level as a result of land use change when palm oil plantations are established?	ISCC EU 205 4.3.2 talks about emissions from carbon stock changes caused by land-use change	
Does the standard require monitoring and control of GHG emissions from production operations after planting?		"For the following elements in the supply chain, information on GHG emissions must be provided: a) Raw material production (extraction or cultivation) b) Processing units (companies, that process raw materials/input materials and thereby change relevant physical or chemical properties) c) Transport and distribution" (ISCC EU 205)	2
	Does the standard explicitly require measurements of green house gas emissions and calculation of net GHG balance at management unit level for ongoing production in existing plantations, taking into account any sequestration by woody vegetation and soils within the management unit?	Yes	
	Does the standard anticipate GHG accounting to take account of both - CO2, including recycling of woody carbon? - Methane emissions from processing/waste disposal?	Yes	
	Does the standard set out a hierarchy of measures to mitigate GHG emissions from existing PO plantations?	Partly covered. "Emissions from the extraction or cultivation of raw materials apply to all agricultural raw materials, such as rapeseed/ canola, palm, soybean, wheat, corn/maize or sugarcane. If wastes or residues are used as a raw material of a process, the GHG emissions of extraction or cultivation of the raw material is considered to be zero and emissions at the point of origin of the waste or residue are zero. GHG emission calculation shall always refer to a single raw material, for which the different input values are gathered. The actual GHG value for a raw material must be provided to the recipient of the raw material in the unit kg CO2eq/dry-ton raw material." (ISCC 205: 13).	
	Does the standard allow for the use of financial instruments to offset residual GHG emissions from plantation operations (beyond any measures to mitigate emissions through good management practice)?	No	
Does the standard allow for linking of emissions reductions to national targets?		No national target are identified, apart from mentioning "5 IPCC guidelines for National Greenhouse Gas Inventories, Volume 4, Chapter 11, http://www.ipccnggip.iges.or.jp/public/2006gl/pdf/4_Volume4/V4_11_Ch11_N2O&CO2.pdf " (ISCC EU 205) ISCC 205, 1: "Following the requirements of the Renewable Energy Directive 2009/28/EC amended through Directive (EU) 2015/1513 (RED) and Fuel Quality Directive 2009/30/EC amended through Directive (EU) 2015/1513 (FQD)1, ISCC requires a minimum level of GHG savings for final biofuels. In the case of installations that were in operation on or before 5 October 2015, biofuels and bio liquids shall achieve GHG savings of at least 35% until December 2017 and at least 50% from 1 January 2018. The GHG emission savings from the use of biofuels and bioliquids shall be at least 60% for biofuels and bioliquids produced in installations starting operation after 5 October 2015."	0

Does the standard require measures to mitigate the risk of GHG emissions as a result of fire? *Ref 4.1e*

No

Legality

Does the standard include requirements to comply with relevant international conventions? (e.g. RAMSAR, CITES)		Yes: RED and amended articles; 2015/1513/EC amending 2009/28/EC and 2009/30/EC; 2011/92/EU, 2008/98/EC; 1107/2009/EC, 2006/507/EC, 756/2010/EU, 757/2010/EU; Directive 98/95/EC; 2009/128/EC, 91/676/EEC; 2009/128/EC; 2009/128/EC, 1107/2009/EC; 2009/128/EC; 2009/128/EC, 1107/2009/EC; 2009/128/EC; 2009/98/EC, 2009/128/EC, 2006/118/EC; 2009/128/EC; 98/391/EEC, 2009/128/EC; 2000/60/EC, 1306/2013/EC; KrW-/abfG Local legislation; Council Directive 92/43/EEC; Directive 92/43/EEC; Directive 2009/147/EC of the European Parliament and of the Council.; General agricultural policy; Ramsar Convention on Wetlands; Principle 5 stands for: "legitimacy of land use; compliance with applicable laws and treaties";	2
	Does the standard list international conventions considered relevant?	Yes	
	If so, is this list comprehensive?	No, CITES is missing	
	Does it include regional as well as global agreements and treaties?	Mostly regional but that overlaps with the scope of the standard - EU	

Does the standard explicitly require compliance with national legislation on protection of biodiversity (where these requirements are more rigorous or restrictive than those of the voluntary standard)?		ISCC clearly refers to the compliance with regional and national laws, stating that the stricter rule prevails: ISCC 202 "3 Requirements for the Production of Biomass All farms and plantations that go through an ISCC audit shall comply with relevant national and regional laws and regulations as long as those laws and regulations do not violate any requirements of ISCC, the RED or the FQD. The stricter rule shall always be followed. If, for example, certain countries have legislation in place that allows for a certain degree of forest clearance for agricultural production which violates ISCC principles, it would not be allowed to produce biomass under the ISCC System on these areas, as this would violate ISCC principles and the requirements of the Directives." Principle 4: (...) "In addition, compliance with relevant national and local laws is required."	2
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Does the standard require respect for local and customary laws providing for protection of biodiversity (where these requirements are more rigorous or restrictive than those of the voluntary standard)?		Standard states that "Applicable laws should be complied with. They apply to: (1) Nationally and internationally protected areas as referred to in Principle 1" (ISCC EU 202: p. 41). Emphases on regional laws for EU, expended in ISCC Plus for international coverage. However the standard does not refer to respect for customary law that provides protection for biodiversity.	0
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Restoration

Does the standard require restoration of natural habitats where their past conversion for palm oil production contravenes the requirements of the standard and/or national legislation?		"Natural watercourses can be streams, rivers, canals or other routes, through which constantly or ephemeral/intermittent water flows, regardless of whether they are still unaffected by human intervention or corrected, straightened or otherwise regulated." (ISCC EU 202: p. 18); "Existing ecological corridors and important landscape elements shall be maintained or, if necessary, restored to minimise fragmentation of the protected habitats. This shall take place in accordance with the type of terrain, wildlife and agricultural practices. Around all protected areas (covered in Principle 1), set aside land or wildlife corridors, appropriate buffer zones shall be protected, restored or set up.(ISCC EU 202: p. 17-18)	1
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	Does the standard require on-site restoration of natural habitats?	No	
	Does the standard set a cut-off date after which any critical habitat destroyed by palm oil planting must be restored?	The overall cut-off date, for all criteria, is January 2008	
	Does the standard set a deadline for undertaking restoration of critical habitat destroyed after the cut-off date?	No	
	Does the standard have requirements on restoration of water bodies to a natural function?	Yes	
	Does the standard allow for off-site restoration or biodiversity off-set as an alternative to on-site restoration?	No	
	Does the standard provide an option for payment of financial compensation as a substitute for restoration of natural habitats?	No	
	Does the standard treat payment of financial compensation as a complement to on-site restoration, to remediate for damage to biodiversity where remediation through ecosystem restoration is not technically feasible?	No	
	<u>OR</u> Does the standard allow developers to use payment of financial compensation as an alternative to on site restoration, which might reduce or dilute the strength of the standard with respect to this criterion?	No	

Does the standard require restoration of peatlands, natural water bodies or riparian vegetation damaged as a result of palm oil production in contravention of the requirements of the standard and/or national legislation?		"Appropriate riparian buffer zones to protect watercourses and wetlands are set up, maintained and restored, taking into consideration crop planting, the application of fertilizers and plant protection products and harvesting. Where natural vegetation in riparian areas has been removed there is a plan with a timetable for recovery." (ISCC EU 202: p. 18)	2
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Community engagement for biodiversity protection

Does the standard include requirements for raising the awareness of workers, smallholders and local communities on biodiversity protection?		"All environmental, social, economic and cultural impacts for surrounding areas, communities, users and land-owners are taken into account. Local historical, cultural and spiritual properties and sites are protected. A participatory social impact assessment should be conducted, where all relevant stakeholders including local communities and indigenous people are engaged. The report is publicly available in a language appropriate to surrounding communities." (ISCC EU 202: 35) There are training requirements that include also local population and small farms/plantations, where applicable: ISCC 202, 3.1.1, though no specific reference to biodiversity protection.	1
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<p>Does the standard make special provision for disadvantaged small producers, enabling them to overcome barriers to certification and participate in certified supply chains, thereby engendering their support for biodiversity protection?</p>		<p>ISCC has implemented a certification approach for Independent Smallholders: "ISH certification is a group certification under the scope of a Central Office (CO). The CO is the holder of the ISCC certificate and is responsible for certain tasks like ISH management, administration, subcontractors or fund management. (...) In order to become ISCC certified, ISH have to comply with ISCC principles one to six, covering the protection of land with high biodiversity value or high carbon stock as well as several ecological and social requirements and management practices. The environmental and biodiversity risk assessment as well as verification of land use change would require certain qualifications and would add quite some costs to the overall audit costs, making it difficult for ISH to achieve certification. Therefore, ISCC has decided to facilitate the process for the land use change analysis for any of the ISH certification projects, reducing the burden, risks and costs for ISH substantially. Verification of compliance with ISCC Principle 1 is concluded by using the GRAS tool, which is recognized by ISCC for the verification of No-Go Areas and Land Use Change (LUC). The necessary GRAS analysis is performed by remote sensing specialists and subsidized by ISCC. Furthermore, through the efficient approach to cover several cooperatives under one ISCC certificate and by this reducing the total number of samples taken for audit the costs for certification are further reduced. No registration and certification fee is covered by ISCC for ISH certification. It is expected that the ISCC ISH certification approach will cost 30 to 40 percent less compared to other approaches and at the same time will help ISH to generate additional revenues via an ISH fund. The underlying cost and revenue structure is currently monitored continuously in order to prove the concept." For further information please refer to the ISCC Website: https://www.iscc-system.org/about/smallholder-integration-with-iscc/iscc-independent-smallholder-ish-certification/</p>	2
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<p>Does the standard require palm oil project developers to engage with local communities on biodiversity protection?</p>		<p>"On the basis of that report, an action plan to address identified social impacts and a continued dialogue with surrounding communities is in place. Negative impacts must be avoided or, if this is not possible, minimized, restored and/or compensated. Documents of regular meetings with communities (with two-way communication) and local government with listed risks and/or impacts and evidence of minuted negotiations or resolution processes must be compiled."(ISCC EU 202: p.35) ; "Biomass production shall not replace stable crops or impair the local food security. In cases whereby local food prices are expected to rise as a direct effect of biomass production, the producer shall set up mitigation measures." (ISCC EU 202: p. 35)</p>	1
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	<p>Does the standard recognise/endorse local agreements/compacts that secure community level support for biodiversity protection in return for;</p>	<p>Yes</p>	
	<p>a. Technical assistance to develop alternative livelihoods that relieve pressure on RTE species and ecosystems?</p>	<p>No</p>	
	<p>b. Securing community land tenure?</p>	<p>Yes</p>	
	<p>c. Direct Payments for Ecological Services?</p>	<p>No</p>	
	<p>Does the standard require monitoring and evaluation of such agreements/compacts to facilitate their continuous improvement and scale up?</p>	<p>Yes</p>	

<p>Does the standard include a requirement to identify and manage potential conflicts between social/community needs/livelihoods and biodiversity conservation?</p>		<p>"A complaint form and/or procedure must be available on the farm/plantation, on which workers and surrounding communities can make a complaint. They shall have been made aware of its existence and complaints or suggestions can be made at any time. Complaints must be dealt with in a timely manner. Complaints and their solutions from the last 24 months must be documented and accessible."; "Mediation is available in case of a social conflict"; (ISCC EU 202: p. 37) However there is nothing on managing potential conflict between the interests of local communities and conservation objectives.</p>	0
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