



# From Policy to Practice: RFNBOs Updates

Juan Marulanda, Sustainability Manager, ISCC  
Julia Nevaes, Senior Project Manager, MCS  
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# ISCC EU RFNBOs Compliance in Practice

# What are RFNBOs

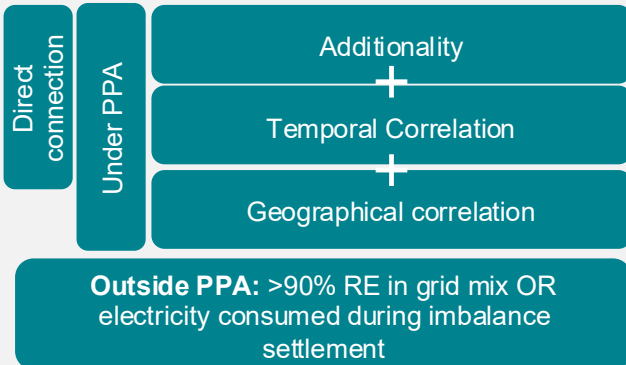
Art. 1(36) RED III - Definition of RFNBOs:

'Renewable liquid and gaseous transport fuels of non-biological origin' means liquid and gaseous fuels the energy content of which is derived from renewable sources other than biomass.

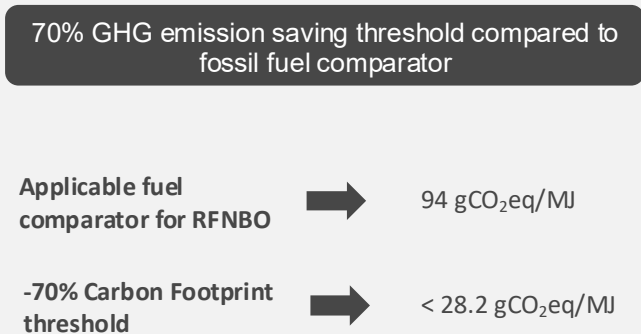
## Certification Requirements



### 1 Electricity Sourcing



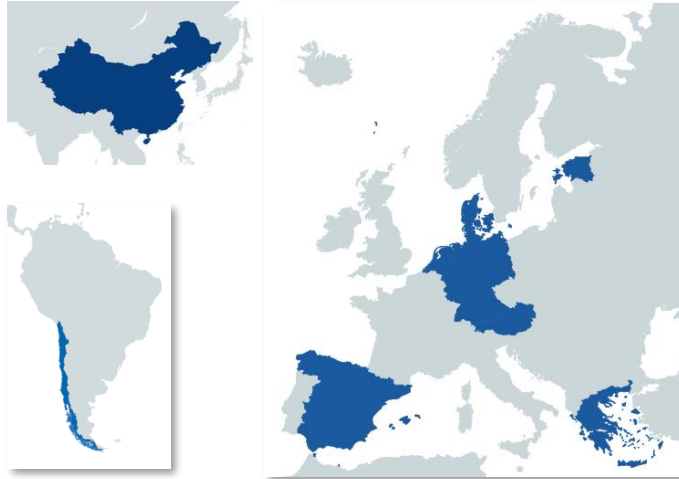
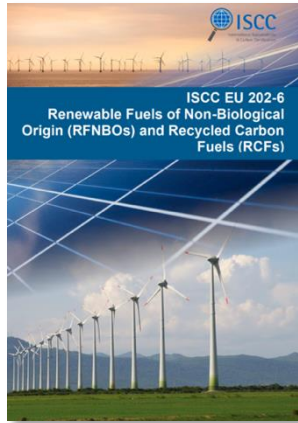
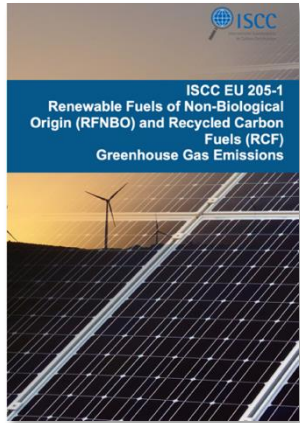
### 2 GHG Emission Savings



### 3 Traceability, Chain-of-Custody, Management System

Rules and requirements for mass balance, PoS handling and management system are in common with ISCC EU certification for biofuels, biogas and related fuels.

# ISCC Leads Global RFNBOs Readiness



- **Recognition** as of December 2024
- ISCC System Documents, Audit Procedures and **FAQ** available

- **31 certificates issued** globally for hydrogen, eAmmonia, eLNG, eMethanol
- **Over 150 auditors** trained globally

- **ISCC RFNBOs Training** (next: 18 March 2026)
- **ISCC Technical Stakeholder Meeting** (past 5 February with +200 attendees)

# ISCC Makes RFNBOs Compliance Work in Practice

## ISSUE



Alignment still maturing across the industry



Complex and evolving requirements



Certification in real-world practice

## SOLUTION



Multistakeholder dialogue



Training and practical guidance



Fit-for-purpose scheme

- Technical Stakeholder Meeting
- Regional Stakeholder Meetings
- Global Sustainability Conference
- Working Groups

- Trainings
- Detailed FAQ
- Projects with Meo Carbon Solutions possible

- Fully operational scheme
- Pre-Certification development
- Audit Procedures for installations consuming RFNBOs (intermediates)

## IMPACT

- Knowledge sharing and exchange
- Highlight practical experiences
- Facilitate dialogue

- Capacity building for economic operators
- Auditor capacity deployment
- Comparable benchmarks

- Market access
- Preparation for compliance and unlocking financial tools
- Pathways to meet targets



# Pre-Certification with ISCC

# Pre-Certification Unlocks Bankability

Proves Feasibility Early, De-Risks Projects, and Opens Access to Finance Mechanisms



## Why Pre-Certification Matters for Bankability?

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Builds financial institutions' and off-takers' confidence by demonstrating that a project is aligned with regulatory requirements from an early stage.



## What is Pre-Certification?

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A third-party document<sup>1</sup> check that shows how ready a project is for a future certification audit.



## How Pre-Certification Works?

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An auditor reviews a project's documents to demonstrate understanding of the requirements and a plan to be fully compliant at a later point in time.

# ISCC EU RFNBOs Pre-Certification

Official launch: 27 Mar 2026



Scan the QR to join the webinar launch

## What it is

- A document-based pre-audit for Economic Operators (EOs), conducted at least at pre-FEED/FEED stages to assess readiness for a future ISCC EU RFNBOs certification audit. It helps ensure alignment with RED III and EU DR (2023/1184–1185) requirements.
- Led by a Certification Body (CB) and conducted by qualified auditors from an ISCC-authorized CB cooperating under the ISCC EU RFNBOs scope.
- Follows the structure and scope of ISCC EU RFNBOs Audit Procedures (APs), covering the management system, traceability, GHG emissions, and renewable electricity sourcing.
- Results in two CB-issued outputs:
  - i. a **Pre-Audit Report** and
  - ii. a **Pre-Certification Report** summarising readiness, and opportunities for improving compliance, **approved by ISCC**.
- A desk-based, document-only review (CB has discretion on how it is carried out).

## What is not


- A certificate or certification decision. **It does not confer certification.**
- A guarantee of certification, the full ISCC EU RFNBOs certification audit (with operational evidence) is still required.
- A verification of operational data from a running plant.
- A form of “limited” or “reasonable” assurance, it provides only an informative indication based on the documents reviewed.
- A basis for making **sustainability claims**.

# Pre-Certification Guidance



## Non-Normative Guidance

- Describes the nature and intention of Pre-Certification in the certification ecosystem.
- Clarifies which requirements can still be missing and what substitute documents can be used for Pre-Certification.
- Explains how to use the ISCC EU RFNBOs Audit Procedures for Pre-Certification.

  
International Sustainability & Carbon Certification

Audit Procedure for Renewable Fuels of Non-Biological Origin (July 2024)

No.	Chapter	Remarks	Risk level	Audit intensity
0.	Basic data	Basic data of the operational unit to be audited	Not applicable	
1.	Management system	Risk assessment according to ISCC EU 102 and 204	Not applicable	
2.	Traceability	Within Chapters No. 2, 3 and 4 the risk of a flawed documentation has to be evaluated. The risk level determines the audit intensity	High	The documents of three successive months should be checked completely
3.	Mass Balance		Medium	The documents of one month should be checked completely and random samples should be taken from three successive months
4.	Greenhouse Gas Emissions	Calculation of actual values	Not applicable	
5.	Sourcing renewable electricity	Check of requirements for counting sourced electricity as fully renewable	Not applicable	
6.	List of Best Practices, Non-conformities and Measures	Defined list of all points marked "no" in the column "Conformity"	Not applicable	



Official launch: 27 Mar 2026



## PRE-CERTIFICATION OF RENEWABLE FUELS OF NON-BIOLOGICAL ORIGIN (RFNBOs)

# Pre-Certification Pilots



Scan the QR and write  
"ISCC Pre-Certification" in the  
subject



## Prepare with MCS



### ISCC

- **Defines** the guidance outlining the scope and reasonable evidence required from Economic Operators seeking Pre-Certification
- **Approves reports** and **maintains** confidential records of all conducted Pre-Certifications



### Certification Body

- **Conducts** Pre-Certification in line with ISCC guidance
- **Issues** the Pre-Audit and Pre Certification Reports
- **Serves** as the first point of contact for Economic Operators



### optional consulting

- **Prepare and guide** Economic Operators to undergo Pre-Certification
- **Follow-up to help** close identified gaps, and position the project for a successful ISCC EU RFNBO official certification audit



# RFNBO Projects with MCS: Learnings

# Connecting the elements to build your sustainable business



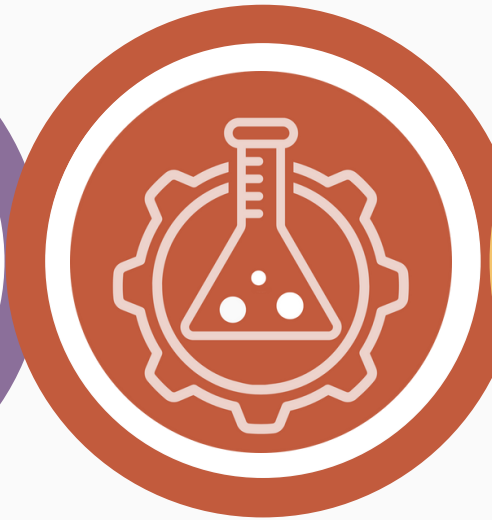
**Carbon  
Footprint  
Improvement**



**Climate Strategy  
& Carbon  
Market**



**New Market  
Certification**



**Sustainable  
Development  
Solutions**



**Supply Chain  
Due Diligence**

# Our RFNBOs services portfolio adapt to different customer needs



## ISCC EU RFNBO workshop and certification support:

Learn the “ABCs” of RFNBOs in a workshop to build practical knowledge on the regulation and how to apply it to your specific supply chain



## Pre-audit feasibility assessment:

Avoid surprises during your audit – our feasibility assessment report checks that your set-up meets all RFNBO certification requirements and identifies potential gaps at early project stages



## GHG emissions calculator:

Ensure your GHG calculator delivers precise, compliant emissions data with our comprehensive support to develop or review it



## Ad-hoc consulting support:

Get support exactly where you need it- with flexible, on-demand help for unforeseen RFNBO questions. Our ad-hoc contracts give you direct access to our expertise.

## Success story: Pilot audit of RFNBO-H<sub>2</sub> used as an intermediate



MCS trained the partner company with a workshop and Q&A sessions on RFNBO requirements.



Together with ISCC, MCS developed the audit procedures for the intermediate scope. These were shared with the Certification Body (CB) and company in preparation for the pilot audit.



Pilot audit took place where audit procedures were first applied in practice. After so, they are adapted according to learnings and feedback from participants.



Results of the pilot audit are communicated to ISCC for the further development of the system





# Thank you!

ISCC System GmbH

Hohenzollernring 72, 50672 Cologne, Germany

[www.iscc-system.org](http://www.iscc-system.org)

