



# HARMONITOR

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REPORT

<b>Lead Beneficiary</b>	Utrecht University
<b>Authors (Organisation)</b>	Martin Junginger, Silvia Seixas Lopes, Michele Mutchek, Li Shen, Maulidia Khairani (Utrecht University), Costanza Rossi (SQ Consult) Birka Wicke (Radboud University)
<b>Responsible Author</b>	Martin Junginger, h.m.junginger@uu.nl
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# 1 INTRODUCTION

The HARMONITOR project aims to enhance the effectiveness and robustness of certification schemes and labels (CSLs) for the EU Bioeconomy. By strengthening the role of CSLs as key regulation instruments, challenges faced by public policy concerning the sustainability of bio-based products could be addressed. However, in order to understand what is the most adequate way for adapting the current benefits and opportunities of CSLs to public policy and expanding their reach in the EU, it is of utmost importance to consult stakeholders involved in the use of such practices. For this reason, task 2.2 aims at conducting an open public consultation with stakeholders that have an interest in CSLs.

The consultation was led by Utrecht University (UU), Stichting Radboud University (RSU), B.T.G. Biomass technology group (BTG) PreferredbyNature (PbN), SQ Consult, Deutsches Biomasseforschungszentrum Gemeinnützige GMBH (DBFZ), and RINA Consulting SPA. The consultation gathered input from stakeholders on important matters that impact the efficiency and reliability of CSLs. The feedback obtained from the consultation will be used to initiate the HARMONITOR platform and establish a foundation for the work packages (WP) 4 (review and analysis of selected existing CSLs for biological resources, bio-based materials and products), 5 (development and application of a CSL monitoring system), and 6 (quantification of costs, benefits and economic feasibility of CSLs).

This report describes the methodological steps of the stakeholder consultation and presents preliminary results based on the inputs obtained as of May the 8<sup>th</sup> which will be used as a starting point for a stakeholder consultation workshop at EUBCE Conference taking place in Bologna in June 2023.

## 2 METHODOLOGY

The public consultation was carried out based on an online survey. This survey was developed by Michele Mutchek, Li Shen and Martin Junginger (UU), Costanza Rossi (SQ Consult) and Birka Wicke (SRU), in close collaboration with project partners from the HARMONITOR project, as well as from the sister projects STAR4BBS and SUSTCERT4BIOBASED. In particular, partners from TU Berlin, Wageningen University, International Social and Environmental Accreditation and Labelling Alliance (ISEAL) and Environmental Coalition on Standards (ECOS) provided detailed feedback and advice on earlier drafts of the survey (especially on the application of the ISEAL credibility principles).

The survey consists of 4 parts:

- In the first part, respondents<sup>1</sup> needed to provide their background (to which of the 10 defined stakeholder groups they belonged) and where they were based geographically.
- In the second part, respondents were asked to provide their general view on the possible advantages and disadvantages of CSLs, and a number of questions of how familiar they were with legislation covering the sustainability of biobased products in the EU (of which a number make use of CSLs to demonstrate compliance).
- Next, as central part of the questionnaire, respondents were asked to indicate the strength and weaknesses of CSLs for each of the ten ISEAL credibility principles. Respondents could indicate up front whether they wanted to answer these questions for CSLs in general, or with a specific CSL in mind. Respondents could rank CSLs for each principle from (very) weak to (very) strong. **Only in case the selected weak or very weak, they were also asked to provide an explanation and motivation for this choice.** This is an important aspect to keep in mind while navigating the results of the survey since providing only negative comments related to CSLs might create a skewed overview of the stakeholder's perceptions. However, this choice was made to identify the pitfalls of CSLs, with the assumption that the positive benefits of CSLs are already widely recognized by EU policy, and with underlying aim to use the result of this consultation to identify weak spots in CSL's that should be addressed in particular in a monitoring system. Moreover, in case respondents mentioned a specific CSL explicitly, this was anonymized in the results section since the objective of this consultation is to not discriminate against existing CSL, but rather to find points for improvement for CSLs' regulation.
- Last, respondents were asked if they were willing to provide their name and contact details to follow up with in-depth interviews, and whether they would like to receive the survey results.

A full overview of all survey questions can be found in Appendix A.

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<sup>1</sup> (in the text the terms respondents and stakeholders are used interchangeably)

The central framework on which this consultation was based is the ten 2021 ISEAL credibility principles<sup>2</sup>: Sustainability impacts, Collaboration, Value creation, Measurable progress, Stakeholder engagement, Transparency, Impartiality, Reliability, Truthfulness, and Continual improvement. This framework was used for methodological consistency, as it will also be an important starting point for the Joint Monitoring System (JMS) in Wp5 and several tasks in WP6. the basis for the

The credibility principles define the core values of credible and effective sustainability systems and provide the foundations for these systems to deliver greater impact. The 2021 version of the credibility principles is based on an extensive global consultation that allowed ISEAL to come up with a sharper list of credibility principles through stakeholders' feedback. The principles help organizations develop standards and similar sustainability tools to understand which attributes of their system are critical to the credibility of their approach, and why this matters for improving sustainability performance and delivering impacts. The principles also help businesses, governments, and civil society to identify systems that can be effective partners in delivering against shared sustainability objectives. As such, they were deemed highly relevant, credible, broadly accepted and suitable as the basis for this consultation. Each principle served for a specific question in the survey, and participants were able to provide feedback for either specific CSL's or general if they thought that CSLs performed (very) weakly in each principle.

The survey was disseminated through a number of different channels:

- All project partners from HARMONITOR, STAR4BBS and SUSTCERT4BIOBASED were requested several times to disseminate the invitation for the survey through their networks to relevant stakeholders. In particular, ISEAL and ECOS also encouraged their members to fill in the survey.
- The members of the joint advisory board of the three projects were also requested to disseminate the request through their networks.
- The survey was advertised through repeated posts on LinkedIn and Twitter and other social media.
- Last but not least, a search was carried out through social and traditional online media for recent initiatives that critically reviewed the role of CSLs in demonstrating the sustainability of biobased products. The authors of these critical studies and initiatives were then directly contacted by Silvia Seixas Lopes (UU) and invited to fill in the survey.

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<sup>2</sup> [https://www.isealalliance.org/sites/default/files/resource/2021-06/ISEAL-Credibility-Principles-V2-2021\\_EN\\_ISEAL\\_June-21.pdf](https://www.isealalliance.org/sites/default/files/resource/2021-06/ISEAL-Credibility-Principles-V2-2021_EN_ISEAL_June-21.pdf)

## 3 RESULTS ANALYSIS

This section describes the results of the stakeholder consultation on CSLs across various questions. The first part of the survey (Chapter 3.1) deals with general questions about the stakeholders' backgrounds. The second part investigates their perceptions of CSLs (Chapter 3.2). The third part of the survey focuses on the ISEAL principles and how the stakeholders perceive CSLs in relation to them (Chapter 3.3). Thirteen stakeholders left their contact information for a further follow-up, however since the interviews still have to take place, the fourth part of the consultation is not discussed in this report.

### 3.1 Respondents background

The first question asked the **stakeholders to identify themselves as part of a stakeholder group**. 67 respondents in total started the survey. However, it is important to point out that the number of respondents to the survey gradually declines through the interview, with 51 respondents completing the first and second part, and only 33 respondents answering the final questions with regard to content (the final part on follow up was completed by 13 respondents). A summary visualization of the results is provided in Table 1.

Stakeholder Type	Started the Survey	Finished Part 1	Finished Part 2	Finished Part 3	Follow-up Part 4
Researcher (academic or otherwise)	15	15	13	9	1
Non-governmental organization	12	12	9	8	4
Private consumer (general public)	9	9	6	1	0
Bio-based products manufacturer that pursues or may pursue obtaining certification	9	9	7	5	2
Sustainability certification scheme and/or label owner organization that develops standards	7	7	5	4	2
Certification body that certifies/audits standards	4	4	4	2	1
Certification support consultant	4	4	4	2	1
Policy maker	4	4	2	2	2
Other (please specify)	3	3	1	0	0
<b>Total</b>	<b>67</b>	<b>67</b>	<b>51</b>	<b>33</b>	<b>13</b>

Table 1: Number of respondents per survey part per different type of stakeholder

Most of the participants that started the interview were researchers or representatives of academia (22% of the initial sample), followed by non-governmental organizations (NGOs) (17%), private consumers and bio-based product manufacturers pursuing/interested in pursuing certification (both representing 13% of the sample). Other stakeholders included in the survey were sustainable certification schemes and/or labels owner organization that develops standards (11%), policy makers, certification support consultants, certification bodies that certify/audit standards, the latter three representing each 6% of the sample responses. Finally, there were also other categories mentioned by the respondents: namely, forest and nature management organization, standardization body, and industry association. There were no responses collected for the categories a) traders of goods and b) business and public sector purchasers of certified and/or non-certified products.

However, it is important to highlight that only 33 respondents completed the survey till the last question. As can be seen in Table 1, the composition of this stakeholder group is different from the overall survey sample and is divided as follows:

- Researchers and environmental organizations are still the biggest group of respondents with 28% and 24% share of the sample respectively;
- The number of private consumers drops significantly through the survey, going from 13% to 3% of respondents;
- The shares of the other stakeholder groups are constant, with the exception of bio-based product manufacturers that are slightly more represented compared to the overall sample by the end of the survey (from 13% to 15%).

These shares are also illustrated graphically in figure 1a and 1 b below.



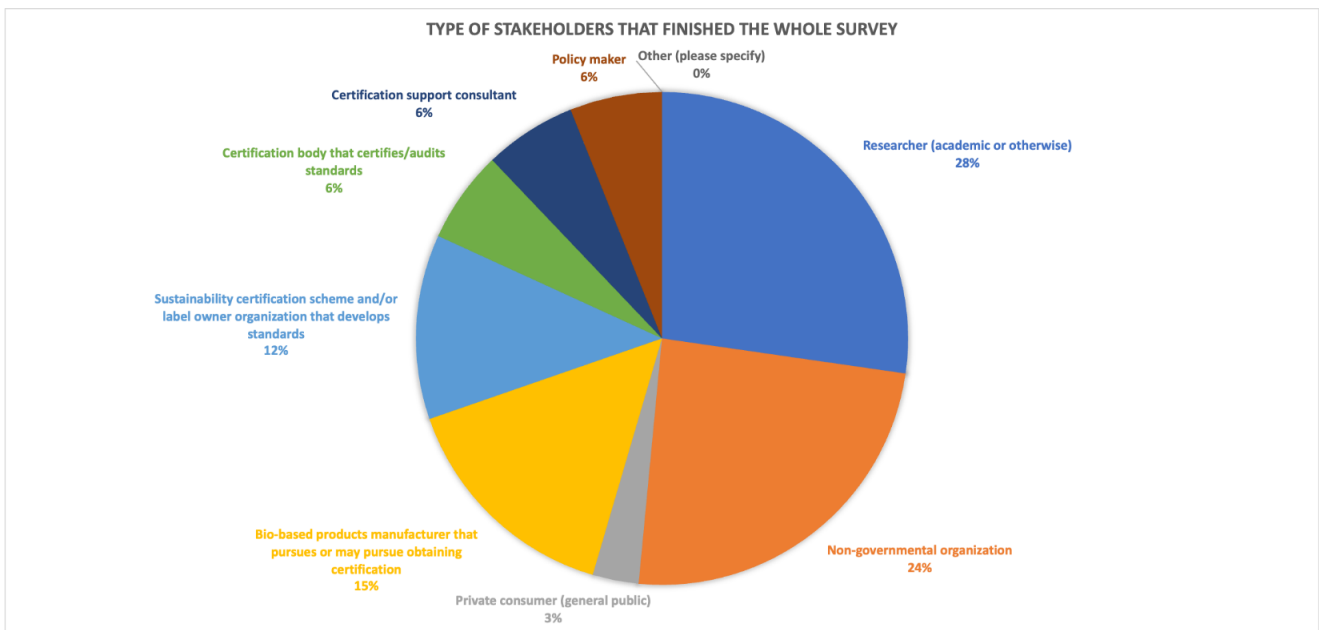
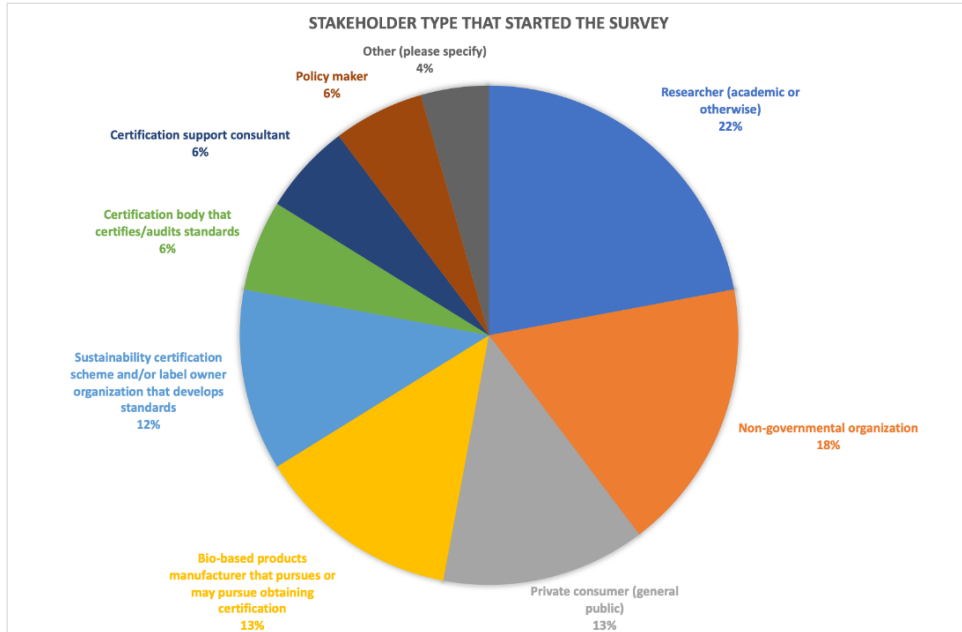


Figure 1a. Type of stakeholders that started the survey (top) and 1b. Type of stakeholder that finished the survey including part 3 (bottom).

The second question in the survey asked the stakeholders **where they are based geographically**. As can be seen in Figure 2, 90% of stakeholders that participated in the survey are based in Europe, specifically in the Netherlands (25%), Germany (11%), Belgium (7%). When it comes to which type of stakeholder is represented by each nation, the Netherlands was represented in all the categories except certification support consultant, Germany was represented through researchers, certification bodies, private consumers, and bio-based product manufactures while Belgian NGOs, private consumers and bio-based product manufactures answered the survey. Other European countries represented in the sample were France (sustainability certification scheme, NGO, academic, and bio-based manufacturer), Italy (certification support consultant, academic, policymaker and standardization body), and the UK (sustainability certification scheme, academic, biobased manufacturer), all singularly constituting 5% of the sample. Greece (researchers), Finland (private consumer and bio-based manufacturer), Switzerland (academic and sustainability certification scheme), Sweden (bio-based manufacturers), Spain (academics), and Portugal (NGOs) were represented by 2 respondents per country. Croatia (NGO), Estonia (NGO), and Ireland (academic) were only mentioned once. Outside Europe, respectively 2 respondents from India (NGO and sustainability certification scheme) and the USA (certification body and certification support consultant) completed the survey. Single respondents were representing Japan (academic), Malaysia (policy maker), Colombia (academic), Argentina (certification support consultant), and Brazil (certification body).

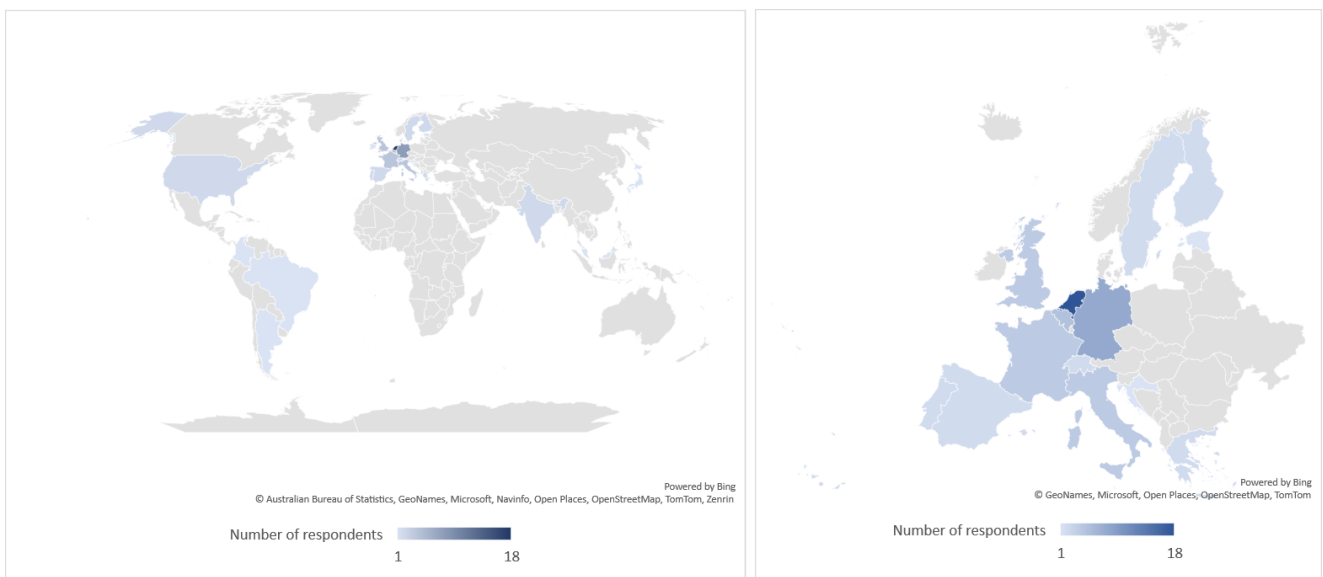


Figure 2a. Geographical location of the respondents globally; 2b. Geographical location of the respondents within EU and surroundings

### 3.2 General views on the CSLs

Figure 3 shows what different stakeholders think about the **advantages of CSLs for the future development of the European Union bioeconomy**, considering that multiple advantages can co-exist at the same time. This means that despite the graph showing only 51 respondents, stakeholders were allowed to select multiple choices, ending with a total 136 responses. Therefore, the percentages reported in this section are connected to the overall number of responses and not of respondents.

Q4 - What are the advantages of sustainability certification schemes and labels (CSLs) for the future development of the European Union bio-economy? Select one or more answers. - Selected Choice  
51 respondents - 136 responses

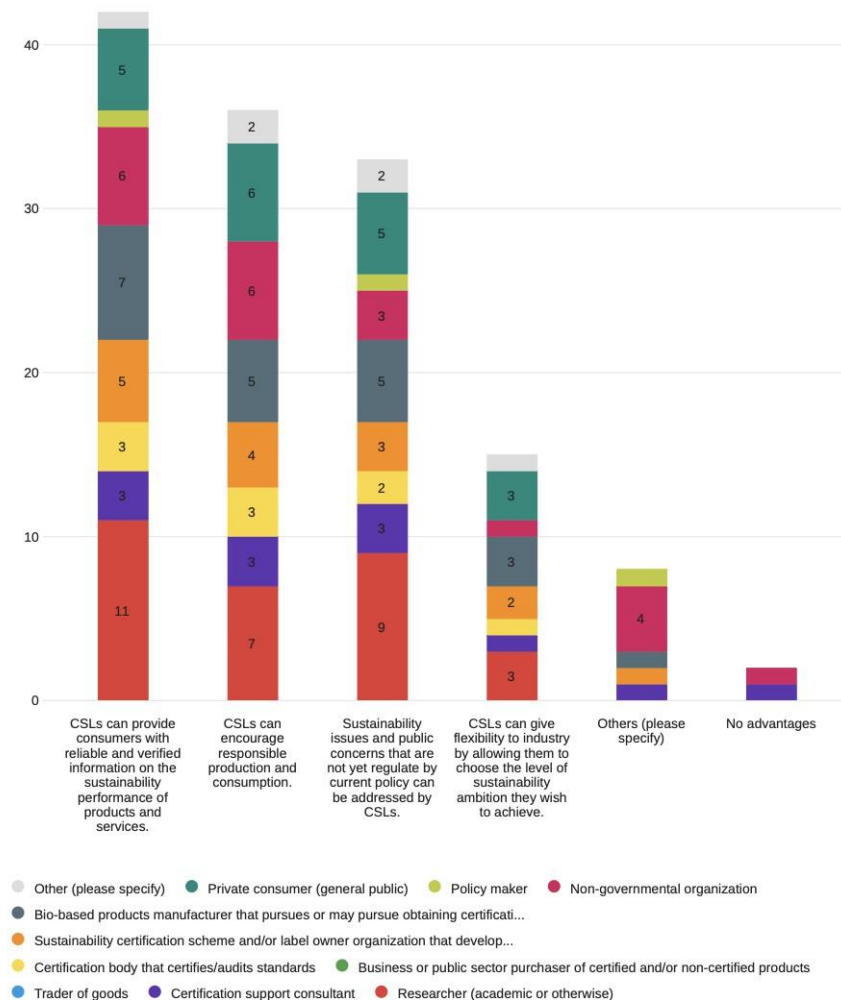


Figure 3. Overview of stakeholder views on potential advantages of CSL. Note that respondents could select several options.

31% of the total responses indicated that “CSLs can provide consumers with reliable and verified information on the sustainability performance of products and services”, while the second most supported argument (26%) was that “CSLs can encourage responsible production and consumption”. The third option “Sustainability issues and public concerns that are not yet regulated by current policy can be addressed by CSLs” was supported by 24% of the responses. The least supported argument was “CSLs can give flexibility to industry by allowing them to choose the level of sustainability ambition they wish to achieve”, with 11% of the responses choosing this entry.

Finally, other advantages of CSLs were also provided as direct input from the stakeholders (mostly NGOs), and 1 NGO and 1 certification support consultant believed that CSLs have no advantages at all. The different types of stakeholders are distributed across the three most chosen replies quite evenly. When it comes to industry flexibility, all the stakeholder types are less represented too, but this is particularly true for researchers. Interesting to notice is the fact that CSLs seem to have more benefits for consumers rather than businesses based on stakeholders’ perceptions. This could indicate some weaknesses in the actual implementation of sustainability ambitions by the industry. However, part of the supposedly positive other advantages given mostly by NGOs, actually point out negative issues that come with CSLs, such as bad track record, lack of regulation of CSLs, and bias from the industry. The statements made were the following:

*“CSL have a terrible track record. They have systematically failed to deliver while being abused by industry to resist regulation. Only when backed by very strict regulation can they play a potentially positive role.”*

*“In my opinion the implementation of them lead to the increase of worst environmental alternatives which compete with food production.”*

*“CSLs provide harmonization and guidance of labelling and claims.”*

*“CSLs can ensure a better income for workers and farmers.”*

*“1: CSL's allow authorities to reduce red-tape and bureaucracy by cascading implementation of regulation to certification markets.*

*2: CSL's drive efficiency by competing for the costs of compliance (paid by participants) instead of offsetting inspection costs by the penalties for non-compliance (paid by taxpayer).”*

*“CSLs lead to gap assessments, improvement plans and internal control systems at production level. Depending on the scheme, it could provide more transparency in the chain and price incentives for certified volumes.”*

*“It largely depends on how the regulations and certifications are derived and should be science based and not entirely based on one sided bias.”*

*“Independent and stringent CSLs can have positive sustainability impacts. However, their use is also problematic in a number of ways as they tend to be too industry friendly and unable to deliver fundamental sustainable change.”*

The following question asked the stakeholders to **select limitations of CSLs**. Similar to the question regarding perceived advantages of CSLs, stakeholders were allowed to vote for more than one answer. The results are shown in Figure 4.

Q5 - What are the limitations of sustainability certification schemes and labels (CSLs) for the future development of the European Union bioeconomy? Select one or more answers.

50 respondents - 119 responses

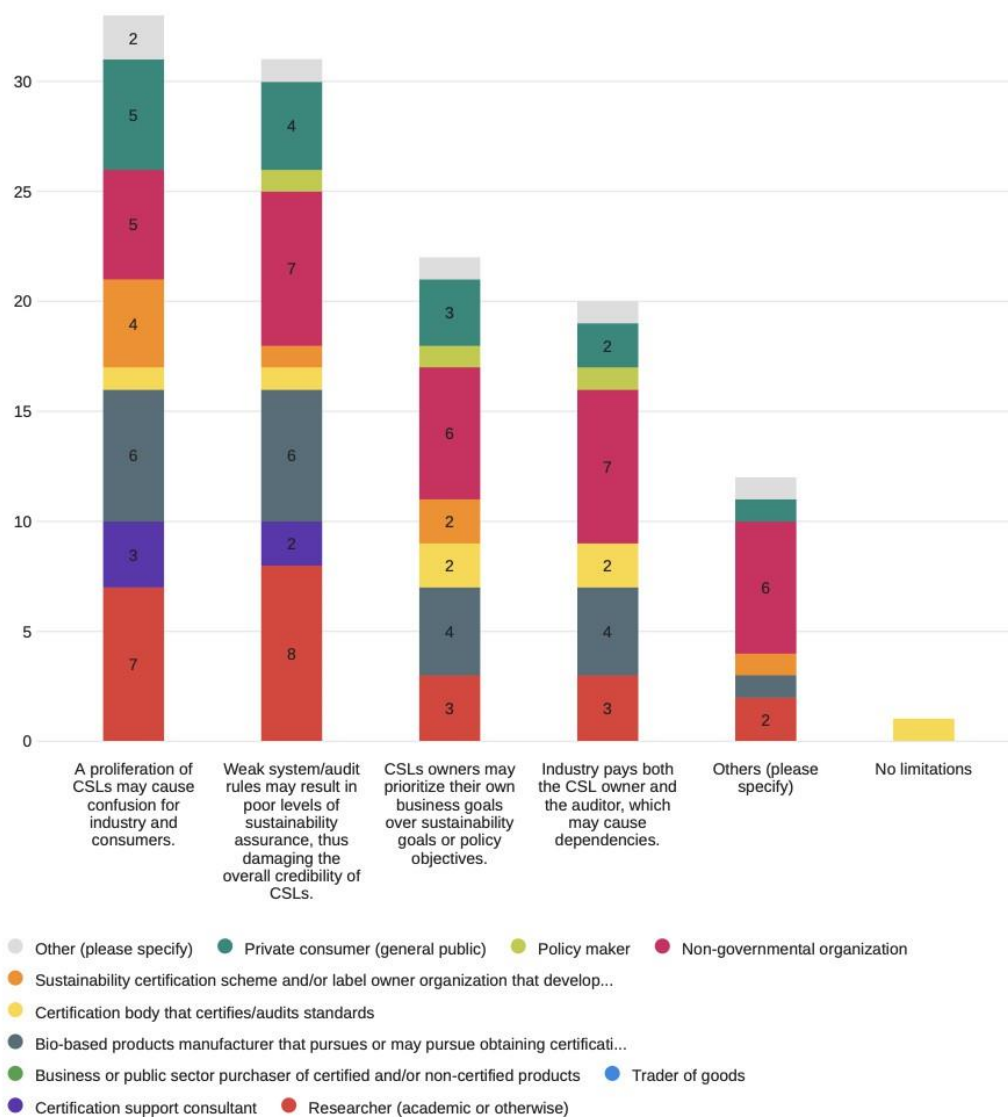


Figure 4. Division of stakeholders across their opinion on limitations of CSLs.

In total, 119 responses were recorded from 50 respondents, i.e. again respondents could select multiple options. The most voted limitation, which represents 28% of the responses, was “A proliferation of CSLs may cause confusion for industry and consumers”, followed by “Weak system/audit rules might result in poor levels of sustainability assurance, thus damaging the overall credibility of CSLs” (26%), “CSLs owners might prioritize their own business goals over sustainability goals and policy objectives” (18%) and “Industry plays both the CSL owner and the auditor, which might cause dependencies” (17%). The first limitation used to be a problem for biofuels certification too, however through time the number of CSLs for that specific sector was significantly reduced making proliferation irrelevant. Yet, interesting to see that sustainability certification schemes are mostly concerned with this aspect. Researchers were the biggest supporters for the first two statements, expressing concerns confusion and credibility of CSLs together with bio-based manufacturers, certification support consultants and private consumers. Impartiality and power dependencies were mostly voiced by NGOs. The other stakeholders were distributed across the different answers. To end with, only a representative of a certification body thought that CSLs have no limitations.

Twelve other inputs were given from stakeholders regarding limitations, mostly by NGOs (6 entries) and researchers (2 entries):

*“Weak sustainability certification is used to resist the need for effective legal standards.”*

*“CSLs may give the consumer a false sense of consuming sustainably.”*

*“CSL are a very indirect way to tackle the problem.”*

*“Puts a burden of proof to NGOs without their consent and without resources.”*

*“Due to increasing proliferation of CSLs clear claims and collaborations for acknowledgement between the CSLs are important.”*

*“Limitations are comparable with financial auditors. Certification is NOT a guarantee, but an instrument for improvement. The CSLs can be improved over time. Risk is that CSL's are not solving all issues, and are not equal to sustainable supply. Sustainability challenges can be very different in different contexts and these issues should be addressed. Businesses might say that everything is sustainable when it is certified, and might not want to invest more in addressing the key issues.”*

*“1. Complexity of systems leads to declining enthusiasm among market parties.*

*2. Some chain parties are experiencing certification fatigue.*

*3. Costs and administrative burdens for certification are relatively heavy for upstream parties, while valorisation of certificates comes into its own upstream.*

*4. Several schedules are active side by side. Mutual recognition of certificates is not common, which hinders market development.*

*5. In the case of the use of biomass residual flows from forests, there seems to be a development underway that forest management must be certified across the board. This would then be done from the context of the use of residual flows, while no certificate is required for the use of round wood (products). This will have the effect that this flow will not be offered or will be offered less, because a forest owner will not certify his entire company for residual flows only. In addition,*

*common forest certificates are probably not compatible with systems for energy application (CO2)."*

*"There is a risk that CSLs or any other strategy is perceived as a silver-bullet, instead of 1 of the solutions that can contribute to sustainable value chains."*

*"Some of the schemes are very robust, follow ISEAL credibility principles and a multi-stakeholder approach, others are purely commercial, developed by private sector companies themselves. The researchers should not lump all CSLs together, but clearly differentiate."*

*"Readiness from supplier side."*

*"\* The possibility of fragmented schemes which are implemented only in certain member states, and not EU wide. \* Potential for variability in standards: certification schemes which do not have minimum requirements based on e.g., EU legislation, which mean that companies can choose the "easiest" compliance route for their certification."*

*"Too industry friendly, unable to deliver fundamental sustainable change, get in the way of regulation, more used as a way to insulate against reputation risks than actual impact..."*

One main issue is the lack of trust in the efficacy CSLs, mainly resulting from CSLs just being one industry instrument for improvement among the many that can be used for the achievement of sustainability rather than a "silver-bullet" that automatically guarantees sustainability. This relates to the fact that CSLs seem to get around the need to develop stricter regulations for sustainability change. The statements "weak certification used to resist effective legal standards" and "CSLs may give a false sense of consuming sustainably" reinforce the need of the robust monitoring system that HARMONITOR aims to develop. From there results also emerges that specifically regulations should differentiate what reliable and credible CSLs are based on a uniformly regulated understanding of standards that would allow for clear recognition across different sectors. Currently, CSLs are fragmented and mainly used to sustainably justify industrial production.

Figure 5 shows how familiar the stakeholders that took part in the survey are with European Union (EU) directives and regulations on CSLs. Most of the stakeholders were found to be moderately familiar with the different EU directives and general CSL regulations, with 43% (18 out of 42) being moderately knowledgeable about general regulations. There is a normal distribution around the moderately familiar entry, meaning that not many stakeholders think they are either completely unfamiliar or or extremely familiar with any of the proposed policies and that stakeholders that took part in this survey are probably reasonably knowledgeable. Interesting to notice, is that 24% of stakeholders is extremely familiar with the EU Renewable Energy Directive (RED), while a relatively high number of stakeholders is not familiar at all with the EU Timber Regulation (26%) and Green Public Procurement (25%). This is also reflected by the fact that according to the results of the survey RED is most known compared the EU Timber Regulation and Green Public Procurement. There are no remarkable differences in the distribution of stakeholder groups across the different levels of knowledge per regulation, although private consumers are found most often in the “not familiar at all” or “slightly familiar category” compared to for example sustainability certification schemes and researchers who are more confident about their knowledge. Other certifications inserted directly by the stakeholders are EU organic farming, Corporate Sustainability Reporting (CSR), Corporate Sustainability Due Diligence (CSDDD), Forest Stewardship Council (FSC), EU Deforestation Regulation (EUDR) and Better Biomass.

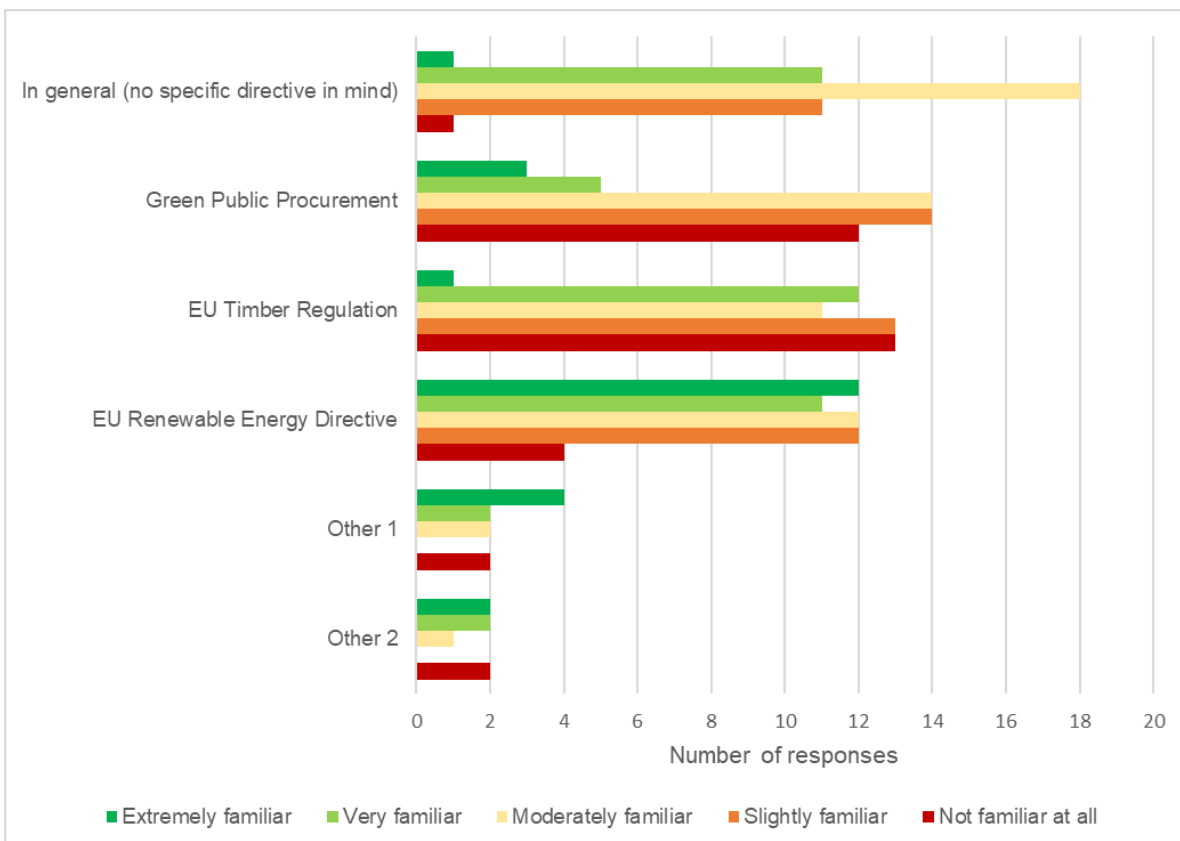


Figure 5. Knowledge perception of different EU directives and regulations on CSLs by stakeholders.



Stakeholders were asked their **opinion on the role of CSLs as a co-regulation instrument in the EU** (Figure 6). 51% of the stakeholders affirmed that *“It should be mandatory for industry to obtain sustainability certification and labelling, and the EU should regulate CSLs”*, meaning that co-regulation by the EU might be widely welcomed by more than half of the stakeholders that took part in this consultation. Yet, the second most chosen option selected by 20% of the stakeholders supported the contrasting view that *“It should be voluntary for industry to obtain sustainability certification and labeling and the EU should NOT regulate CSLs (fully voluntary)”*. However, it is important to mention that different stakeholders within the same group pick different answers and that there is not an overall trend of a specific type of stakeholder choosing always for the same option. Overall, based on inputs from stakeholders, it would be desirable for the EU to engage more in regulation, criteria setting, control systems, and/or guidance, but opinions expressed by individual respondents are diverging. In fact, despite regulation, some stakeholders still believed that labeling could be voluntary to go beyond the legislative obligations. Stakeholders’ opinions in their own words were the following:

*“The use of private standards to show compliance with EU rules make sense only if:  
-the EU standard is strict  
-the EU provide its own system of independent controls and a complaint mechanism to keep private schemes honest  
-dissuasive penalties are imposed on schemes that certify what they shouldn’t.”*

*“The EU shouldn’t conduct audits and shouldn’t set criteria but give a guidance on existing solutions on sustainability certification and labeling.”*

*“I would separate certification and labelling. Certification should be mandatory. Using labels or not can be voluntary.”*

*“I miss that it should be voluntary, and the EU should regulate them.”*

*“It should be voluntary for industry to obtain sustainability certification and labelling, but the EU should regulate CSLs.”*

*“It should be mandatory for industry to obtain sustainability certification and labelling, with a basis of regulatory criteria. Additionally, CSLs should have the freedom to address/supplement/alter requirements to cover areas which are poorly addressed by legislation.”*

*“Again, not all CSLs are equal. Robust systems that follow ISEAL credibility principles are developed and governed in a multi-stakeholder approach are great tools to help the implementation of EU regulations. Private sector weak schemes are pure greenwashing.”*

Q7 - How should sustainability certification schemes and labels (CSLs) be used as a co-regulation instrument in the European Union (EU) for bio-based chemicals and materials? Choose one.

51 Responses

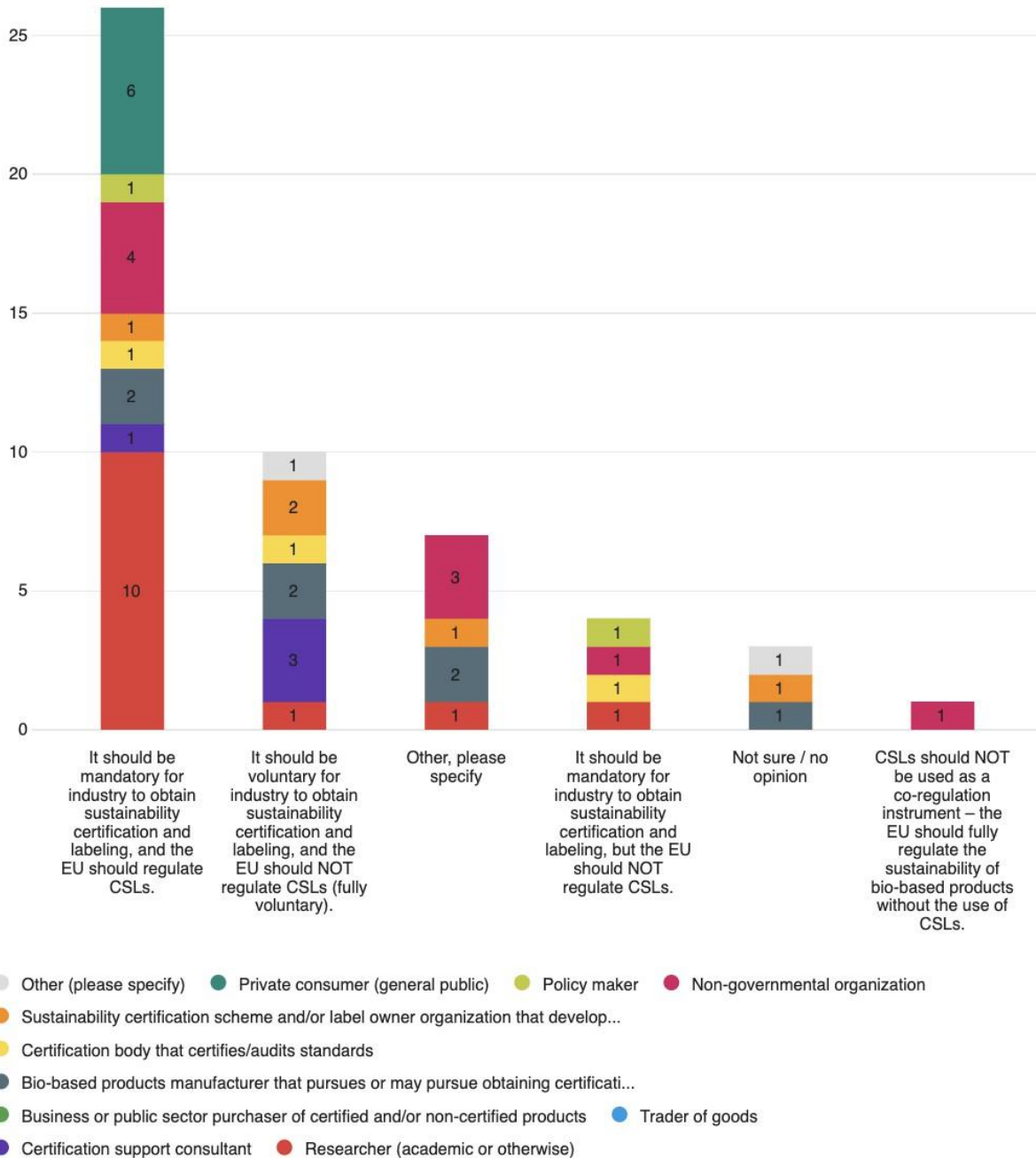


Figure 6. Stakeholders' beliefs on the role of CSLs as a co-regulation instrument in the EU.

### 3.3 Specific questions on ISEAL credibility principles

In the third part of the survey, stakeholders were asked to think about either CSLs in general or a specific CSL, and to answer questions regarding the performance of that CSL with respect to the ISEAL credibility principles. The questions asked to evaluate the CSL the stakeholder picked in relation to each one of the ISEAL principles separately, and to rank the extent to which the stakeholder believed the CSL followed that principle, from extremely weakly (score of 1) to extremely strongly (score of 5). In addition, in case the respondents indicated “weak” or “very weak”, they were asked to provide an additional motivation for this answer. The definition of each ISEAL credibility principle was provided in the questions. The questions are provided on top of each figure in this section, and the full list of question is provided in Appendix A.

There are 52 responses recorded for this part, of which 58% (30) responses answered the questionnaire about CSLs in general. The remainder (22) chose to answer the survey for a specific CSL. The most frequently mentioned CSLs are International Sustainability and Carbon Certification PLUS and EU (ISCC) (40%), followed by Roundtable of Sustainable Palm Oil (RSPO) (14%). The other CSLs mentioned by the stakeholders are Forest Stewardship Council (FSC), Roundtable on Sustainable Biomaterials (RSB), and Sustainable Biomass Programme (SBP), Green Gold Label, Bonsucro, Longtime, and OEKO-TEX. These CSLs were mentioned less than three times respectively. 83% of the bio-based manufacturers responses were focused solely on ISCC. Note that this report does not focus on the strengths or weaknesses of specific CSLs, but rather on differentiating between stakeholders that provided views on CLS in general and those that provided views on specific CSL's.

As can be seen in Figure 7a), CSLs in general score lower than specific CSLs on average. The scores are constant across all the principles for CSLs in general, except Sustainability Impacts. The latter was perceived more positive/neutral compared to the other principles. Specific CSLs were on average ranking higher all the ISEAL principles compared to general CSLs. The principles with the highest positive score were Transparency and Stakeholder Engagement, while the principles with the lowest score were Measurable Progress and Sustainability Impact (although this last one was still higher on average compared to general CSLs). To avoid bias in the sample due to outliers, a second graph (Figure 7b) shows the median of the results per principle. Again, the same trend in which specific CSLs score more positively compared to general CSLs is visible. However, in this case there is an overlap between the scores for Sustainability Impacts between general and specific CSLs. This suggests that there is not much difference in the perceived Sustainability Impacts between general and specific CSLs. Another interesting finding is that by using the median Stakeholder Engagement for specific CSLs scores very high, with a tendency towards “extremely strongly”, showing that stakeholders have a positive perception of this principle for specific CSLs.

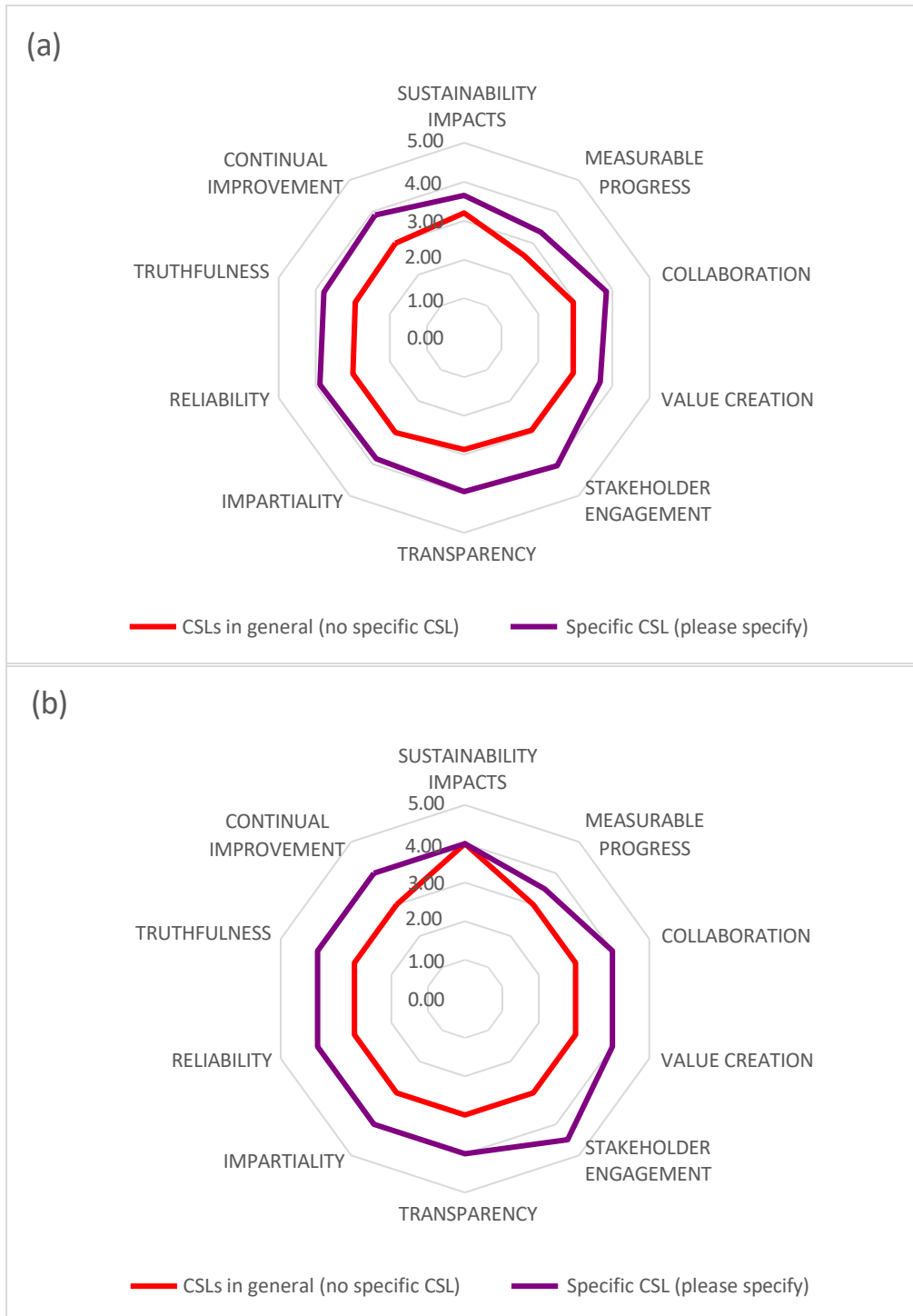


Figure 7. Perceived performance of General and Specific CSLs with regard to the ten ISEAL credibility principle on a scale of 1-5, with 1-5 indicates extremely weakly, somewhat weakly, neither weakly nor strongly, somewhat strongly, and extremely strongly, respectively. Figure (a) shows the scores based on **average** values. Figure 7 (b) shows the scores based on the **median**.

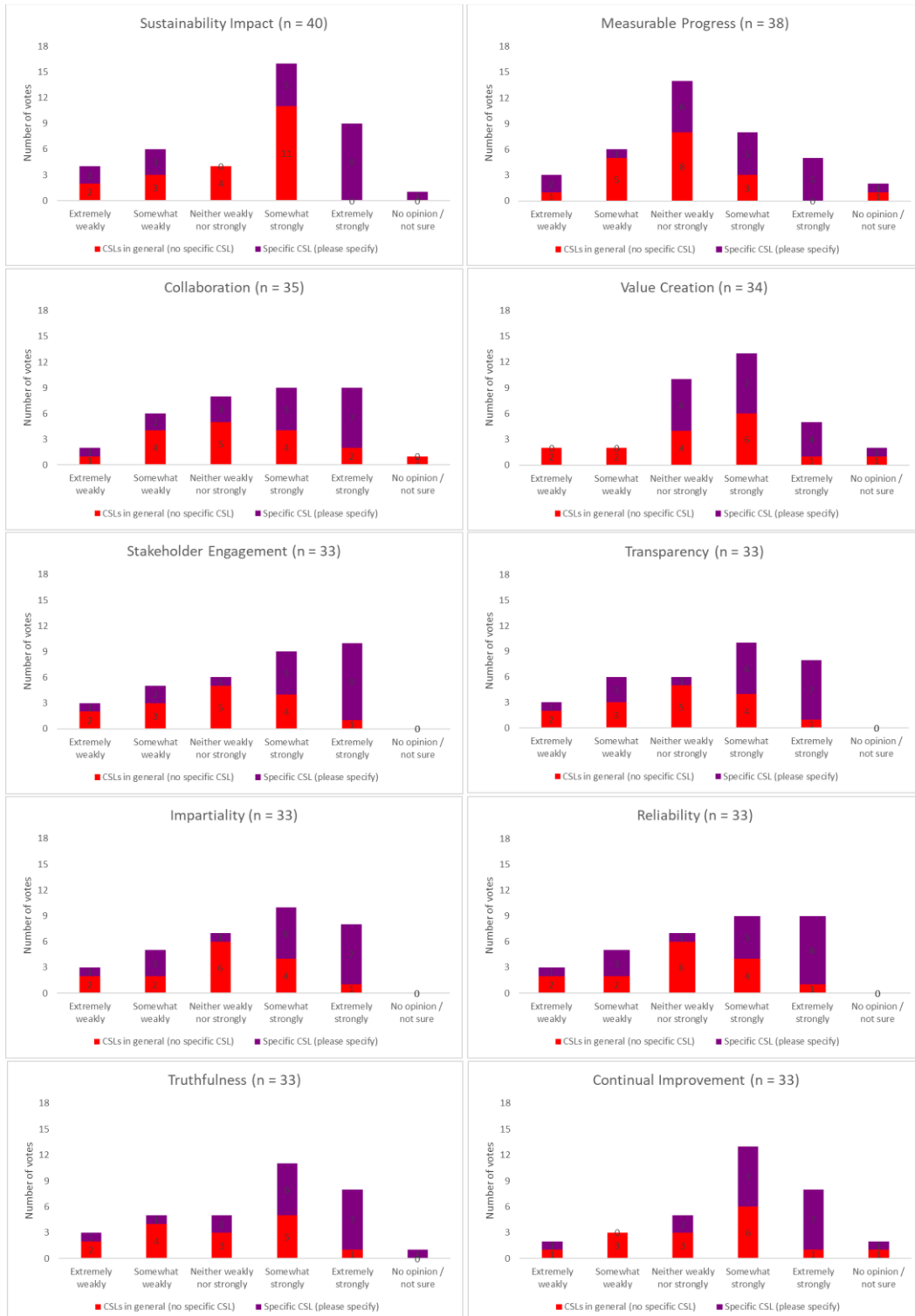


Figure 8. Stakeholders' thoughts on the ten ISEAL credibility principles of CSLs across specific and general CSLs.

Figure 8 shows an overview of the results of the questions on the ISEAL principles across CSLs in general and specific CSLs. The overall picture looks positive on several principles, with most of the principles being scored with “somewhat strongly” or “extremely strongly”. The only exception to this behaviour holds for the principle of Measurable Progress, for which most respondents were neutral and picked the “neither weakly or strongly” entry creating a normal distribution pattern. The principles with the highest number of “extremely strongly” entries were Stakeholder Engagement, Sustainability Impact, Collaboration and Reliability, although most respondents had a specific CSLs in mind when picking this option. “Somewhat strongly” was chosen by most respondents for the principles of Sustainability Impact, Value Creation and Continual Improvement. At the same time, the principle with the most “extremely weakly” entries compared to the other principles was Sustainability Impact. However, this might be due to the fact that the number of respondents for this question is higher compared to other questions. Finally, Collaboration, Sustainability Impact, Measurable Progress and Transparency received all a relatively high number of “somewhat weakly” scores.

In the next sections, each specific principle is analysed, carefully also considering the type of stakeholders that agreed or disagreed with the principle being reflected in the CSLs they had in mind. A breakdown result per stakeholder group can be found in Appendix B. The percentages calculated in the results are either based on the whole sample of respondents for the specific question at hand or calculated in the respondents that either selected a specific or CSLs in general sample. Moreover, it is important to acknowledge that the criticism presented in the next section should not be given too much weight when looking at the bigger picture that shows that the majority of stakeholders were quite positive about the principles. However, since the survey was mostly focused on understanding the pitfalls and points for improvement of CSLs, it is still valuable to discuss the criticism to understand opportunities for policy integration of these weaknesses. The concerns of stakeholders are presented one by one for each principle to make sure everyone’s voice is given floor.

### 3.3.1 Sustainability Impacts

The first principle investigated was **Sustainability Impacts**, in terms of positive social, environmental, and economic wider or systemic impact purpose (Figure 9). The definition of Sustainability Impacts used in the survey was: “A credible sustainability system has a clear purpose to drive positive social, environmental, and economic impacts and to eliminate or remediate negative impacts. It defines and clearly communicates its scope, its specific sustainability objectives, and its strategies for achieving these objectives (its theory of change). The system focuses on the significant sustainability impacts in its scope. It seeks to address the root causes of sustainability issues and deliver wider or systemic impacts. It reflects current scientific evidence and international norms when relevant. It is adapted to local or sector-specific conditions where this helps improve impact”. The question asked respondents to keep the definition of Sustainability Impacts in mind and agree with the extent they believed this principle was reflected in the CSLs they were considering. 40% of stakeholders agreed that CSLs “somewhat strongly” follow this principle, followed by “extremely strongly” in the view of 23% of the stakeholders. Note that only stakeholders with a specific CSLs in mind answered with the entry “extremely strongly” (see Figure 9). In contrast,, critical concerns were voiced by 25% of the stakeholder with equal preoccupation

regarding specific and general CSLs. Despite the high number of positive answers to the principle, when looking at the overall picture, this principle also received a higher amount of criticism compared to others. However, this might also be due to the fact that the number of respondents is higher in this question than in the others. The issues were raised by NGOs, researchers, bio-based product manufacturers, and consultants showing an agreement among several different types of stakeholders. In general, these statements seem to point out the underlying issue that CSLs are not made to have an impact, but rather to accommodate company needs. Their voluntary nature makes them prone to exceptions and irregularities, especially considering the often their focus is not on overall sustainability but only on one specific aspect of it, such as for example CO2 reduction.

The following concerns regarding specific CSLs were raised:

*“Forest destruction continues even in places that have near-universal forest certification and even the worst forms of forest degradation are routinely practiced by certified companies.”*

*“GHG only voluntary; the mass balance principles.”*

*“I feel they are too industry oriented and less consumer.”*

*“Too allowing, too many exceptions.”*

*“It is not so much focussed on impacts as far as I am aware.”*

Issues mentioned concerning general CSLs were:

*“The level of ambition of CSLs remains relatively low overall.”*

*“All CSL lack of a holistic and systemic view of biomass production and use. They don't understand biomass markets and its relation with land use, food, feed energy and bioproduct production. In most cases they produce the contrary effect promoting alternatives worse for the environment and for food and feed production. In my opinion CSL are example of total failure and they are accelerating the move in the wrong direction.”*

*“Clear purpose to drive positive social, environmental, and economic impacts- all three aspects not well covered.”*

*“All existing miss cumulative impacts, but unfair burden to NGOs and are more or less controlled by industry.”*

Q10 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the SUSTAINABILITY IMPACTS credibility principle?

40 Responses

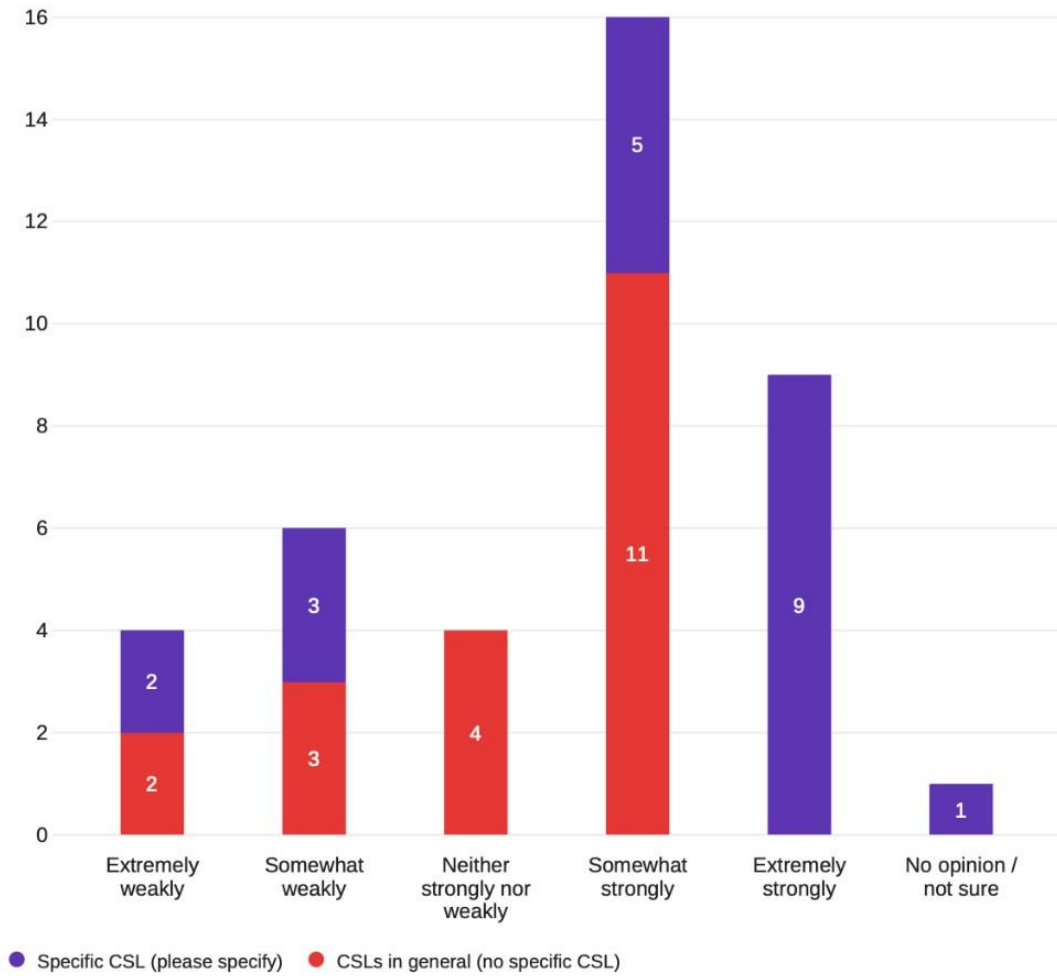


Figure 9. Stakeholders' thoughts on Sustainability Impacts of CSLs across specific and general CSLs.



### 3.3.2 Measurable Progress

The second principle investigated was **Measurable Progress**, intended as tools that can be used over time to demonstrate progress towards objectives, i.e. impact (Figure 10). The definition of Measurable Progress in the survey was: “A credible sustainability system has tools that are relevant to achieving its sustainability objectives, and these tools allow progress towards objectives to be measured over time. It collects and analyses the data it needs to measure, understand, and demonstrate the progress its users are making towards these objectives”. As previously, the question asked respondents to keep the definition of Sustainability Impacts in mind and agree with the extent they believed this principle was reflected in the CSLs they were considering. A normal distribution around the entry “Neither strongly nor weakly” (37% of answers) was visible among the stakeholders, with researchers and certification bodies having the biggest share of it (See Appendix B). Criticism was higher towards general CSLs, while a higher progress measurability was perceived by 50% of the stakeholders that chose a specific CSL (Figure 9). The composition of the critical group was varied and included NGOs, a certification support consultant, a certification body, a policy maker, a researcher, a bio-based manufacturer, and a private consumer. An issue pointed out is the lack of progress reporting based on strict metric systems, which eventually leads to lack of awareness among consumers on the overall impacts of certified products along the value chain.

Critiques on specific CSLs were:

*“There has been virtually no progress in the quality of exploited forest in key certified areas (e.g., Sweden, Finland, Polish state forestry estate etc).”*

*“(\_\_\_\_) does not have a metric system or baselines. There is no systematic tool for continual improvement against a baseline, it is compliant or not compliant.”*

Critiques on general CSLs included:

*“It is something that is hardly communicated to the final consumer, so even if it happens, the end user is not usually aware of those who perform better.”*

*“There are very few studies that analyse the impact of CSL over the production of different byproducts in the world. An also the implementation of them causing enormous damage to the industry and farmers in different parts of the world is weakly considered. The arouse of new crops is poorly monitor together with new transformation technologies that cause greater environmental damage as for example II generation biofuels from cellulosic materials. Although I have participated in two EU projects.”*

*“Some aspects are well measured, others not.”*

*“The effectiveness of CSLs in general is often not measured or even hard to measure at all. For example, the criteria are vaguely formulated.”*

Q16 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the MEASURABLE PROGRESS credibility principle?

38 Responses

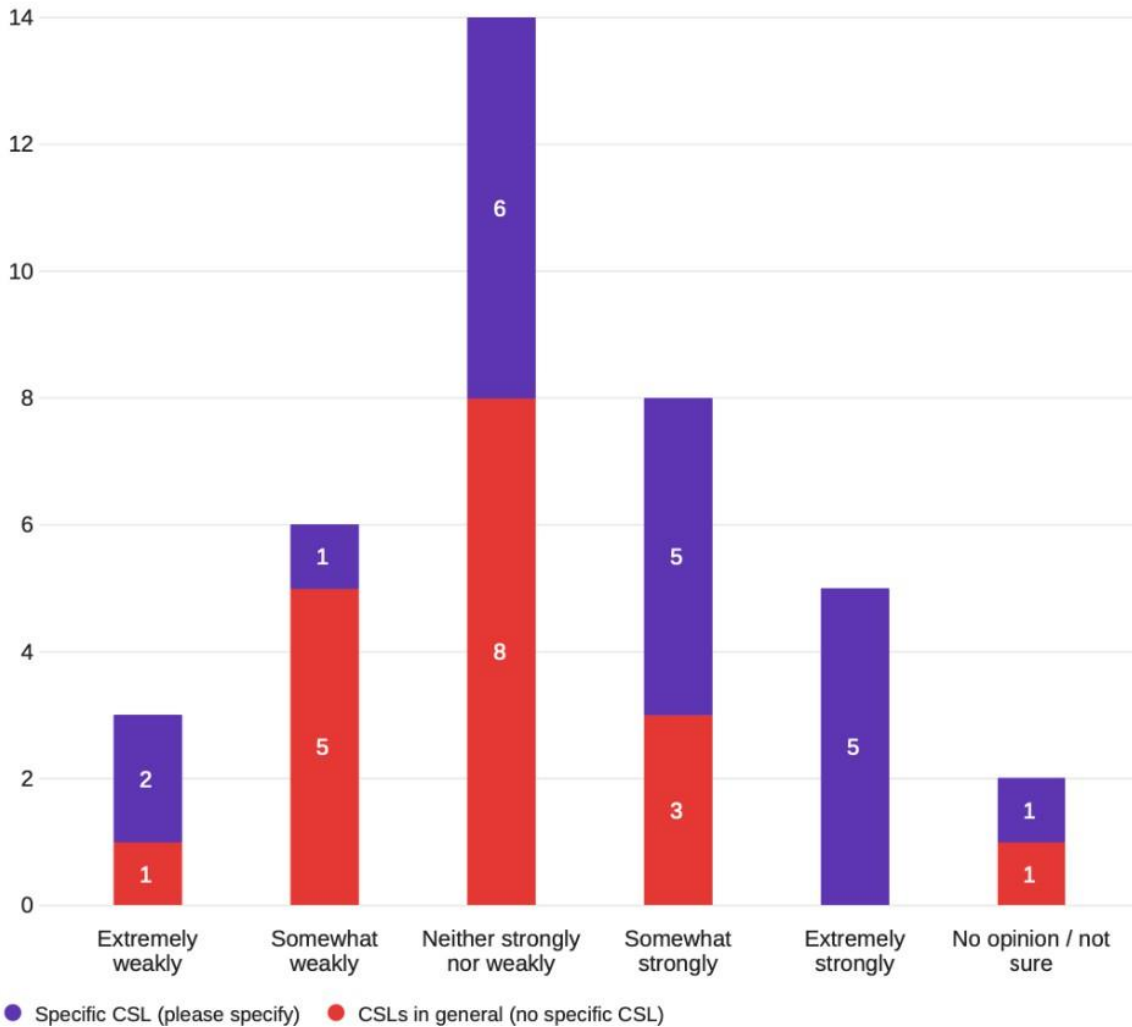


Figure 10: Stakeholders' thoughts on Measurable Progress of CSLs across specific and general CSLs.

### 3.3.3 Collaboration

**Collaboration** is another ISEAL principle which defines the degree of collaboration between different organizations such as governments, businesses, and civil society organizations based on partnership and alignment of objectives (Figure 11). Specifically, the definition used was: “A credible sustainability system identifies governments, businesses, and civil society organizations, including other sustainability systems, that are working towards shared sustainability objectives. It actively seeks alignment and respectfully pursues collaboration with others. It establishes partnerships and shares learnings to improve its efficiency and its direct or systemic impacts”. In this case, the opinion of stakeholders was skewed towards “somewhat strongly” and “extremely strongly” believing CSLs follow the collaboration principle (52% of the sample for this question in total). These statements were supported by a variety of different stakeholders, covering 72% of stakeholders’ categories (8 over 11). Despite this, 3 NGOs, 2 researchers and a bio-based products manufacturer still think these aspects were “somewhat weakly” addressed, while a certification body and consultant opted for “extremely weakly” option. 67% of stakeholders that choose a specific CSL believed that the specific CSL perform strongly for the collaboration principle. General CSLs were most prone to criticism, with 30% of stakeholders that choose general CSLs pointing out weaknesses in collaboration.

According to stakeholders, certifications are not mutually recognized among the different players involved in CSLs. The focus of CSLs is mostly on the industry, which does not involve meaningful alignment of objectives with other stakeholders such as NGOs, partners along the value chain (e.g., through Life-Cycle Assessment) or academic researchers in the process, thus resulting in a low stakeholder collaboration. Issues mentioned in terms of weakness of collaboration for specific CSLs were:

*“( ) is very weak in this aspect because don't recognise other certifications as low risk, like ( ).”*

*“Works with industry.”*

*“It is a business led initiative with weak stakeholder involvement.”*

Criticism for general CSLs was expressed as:

*“NGOs remain largely excluded from the CSLs development process.”*

*“Lack of harmonisation of criteria and LCA methodologies.  
Difficulty to cross accept certificates applicable to different steps in the value chain.”*

*“There are important results in several EU projects I have been working on along the last 10 years and I don't see those findings being considered in the development of new CSL what I see is governments are insisting on the wrong pathways maybe influenced by strong lobbies interested in promoting certain alternatives. I recommend findings of GlobalBiopact, Babethanol and Babetreal5 EU projects.”*

*“I am not aware of particularly strong collaboration between schemes.”*

Q12 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the COLLABORATION credibility principle?

35 Responses

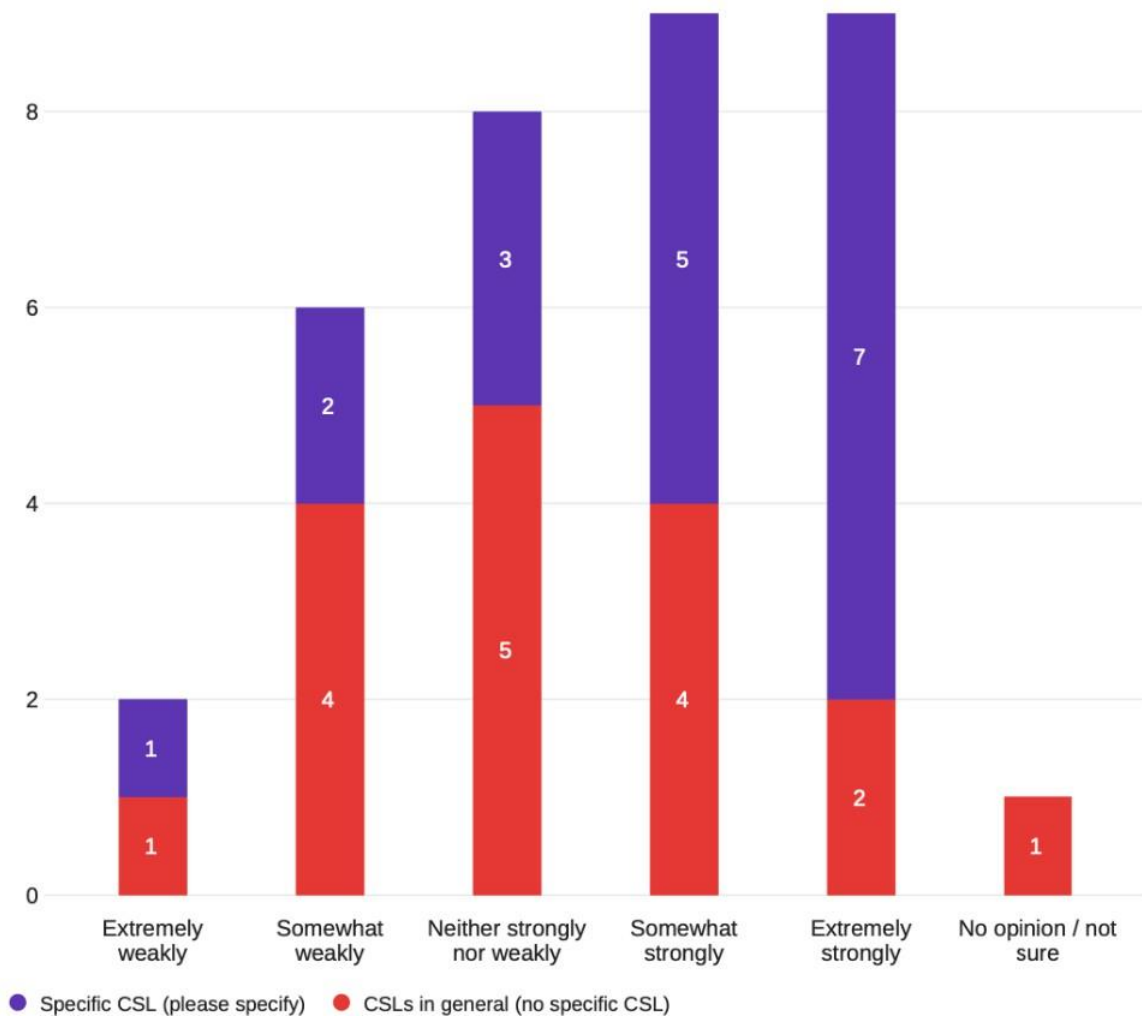


Figure 11: Stakeholders' thoughts on Collaboration across specific and general CSLs.

### 3.3.4 Value Creation

Next, stakeholders were asked their opinion on **Value Creation**, meant as rewards achieved through CSLs business model viability (Figure 12). Precisely, Value Creation was defined as: “A credible sustainability system strives to create value that fairly rewards the effort and resources that it takes for users to participate in the system. It has a viable business model, and it operates efficiently, minimizing costs for users and reaching more users by reducing other barriers to access. It supports users to implement its tools, and it empowers users by demonstrating a clear business case for participating in its system”. 36% of stakeholders believed that the CSLs they had in mind “somewhat strongly” contributed to this principle, with a similar distribution between specific and general CSLs. 29% of respondents selected a neutral opinion, including five researchers, three bio-based product manufacturers and two NGOs over a sample of 34 respondents. While there were no concerns on specific CSLs, two researchers, an NGO, and a certification support consultant (11% of the total stakeholders) were concerned about CSLs in general. This indicated a much lower criticism compared to other ISEAL principles. The inputs of these stakeholders were related to higher costs, lack of economic value and high access barriers, as can be seen in the following sentences:

*“What I see is higher costs, higher environmental impacts, increasing losses to industry, reduction in investment and growth.”*

*“It is not said that they create economic value.”*

*“Minimising costs for users and reaching more users by reducing other barriers to access. - I do not think this is generally true.”*

Q14 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the VALUE CREATION credibility principle?

34 Responses

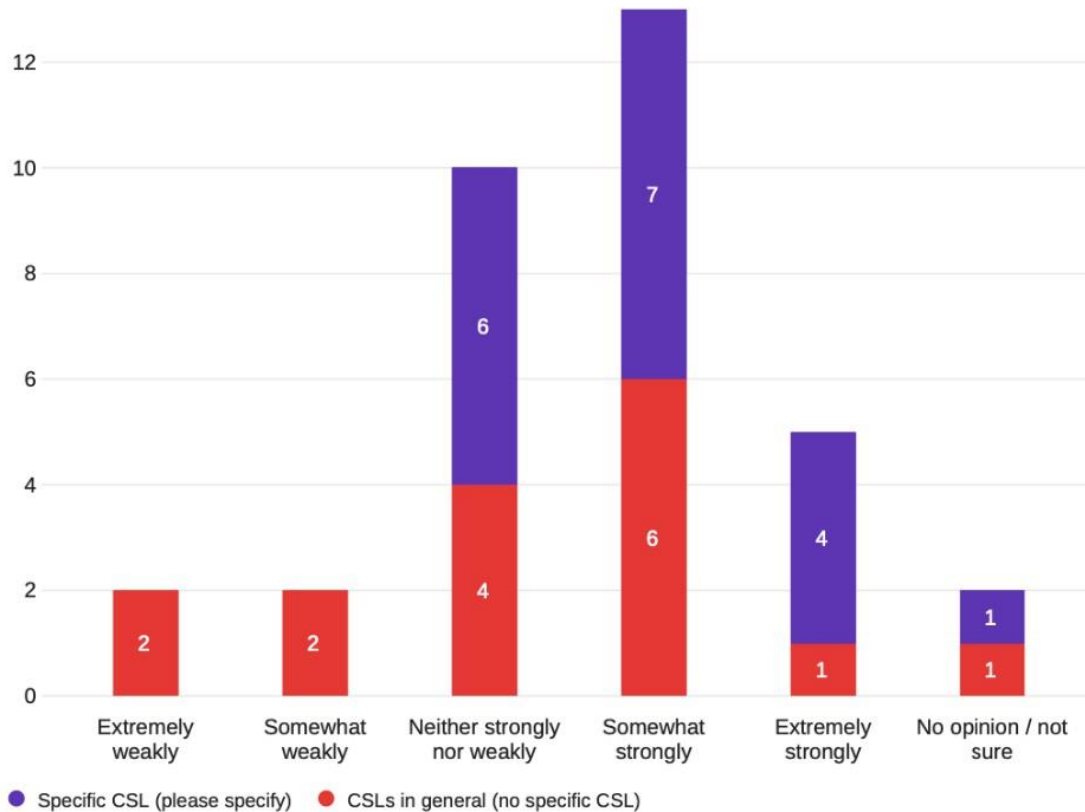


Figure 12: Stakeholders' thoughts on Value Creation across specific and general CSLs.

### 3.3.4 Stakeholder Engagement

The principle of **Stakeholder Engagement** reflected the need to have a diverse group of stakeholders participating in the decision-making. The definition used in the survey was: "A credible sustainability system is inclusive and non-discriminatory. It empowers stakeholders to participate in decisions and hold the system to account. It involves a balanced and diverse group of stakeholders in decisions that will affect them. It strives to understand the context and perspectives of stakeholders who have been under-engaged or under-represented, and it creates opportunities to ensure their participation in decision-making. It provides clear and transparent feedback on stakeholder input and concerns. It has fair, impartial and accessible mechanisms for resolving complaints and conflicts". As can be seen in Figure 13, most stakeholders had a positive impression of this principle, with 57% believing this is either "somewhat strongly" or "extremely strongly" addressed in CSLs. These stakeholders included sustainability certification schemes, certification bodies, bio-based product manufacturers, researchers, certification support

consultants, NGOs, and private consumers (7 over 11 stakeholder groups). Interesting is the fact that 50% of stakeholders that voted for “extremely strongly” had a specific CSL in mind (Figure 13). Negative voices (24% of the sample) were mostly addressed to general CSLs and included mostly NGOs, but also a manufacturer, a consultant, and a researcher. This suggests that NGOs are more critical on this aspect compared to other stakeholder groups. The concerns in relation to specific CSLs were:

*“In countries with strong forestry sector, both certification schemes have been completely captured by the industry who has effectively steam-rolled NGOs into accepting weak standards and even weaker implementation. Rights of native people are still routinely disregarded (including in Europe in the case of Sami lands).”*

*“Too much power from big industries.”*

*“It involves stakeholder in consultations as far as I am aware but does not involve them meaningfully enough.”*

While their concerns for general CSLs were:

*“Again, NGOs remain largely excluded from CSL development and when they are included there is an imbalance of representation compared to industrial interests.”*

*“It is complicated to guarantee a full participation by those less heard, with lower resources to use on these processes. It would be important to improve the support for this participation, including financial support to guarantee equative participation.”*

*“I dont see CSL is seriously addressing the direct and indirect impacts caused by the implementation in all the markets that are affected in special when the implementation of CSL falls on demonizing certain feedstock instead of analyzing the transformation chain as a whole.”*

*“Two-way interaction with certification, particularly with respect to decision making is not well established.”*

*“I believe stakeholder engagement could be set to a higher standard in general. Stakeholders are invited, but often lack funds or commitment to participate.”*

All in all, the issue of industry power keeps re-emerging: other stakeholders such as NGOs or local communities are not given enough floor to meaningfully participate and represent themselves in CSLs governance. Stakeholders suggest that higher support and higher resource investment in stakeholder engagement to allow for a holistic addressment of the implications of CSLs.

Q18 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the STAKEHOLDER ENGAGEMENT credibility principle?

33 Responses

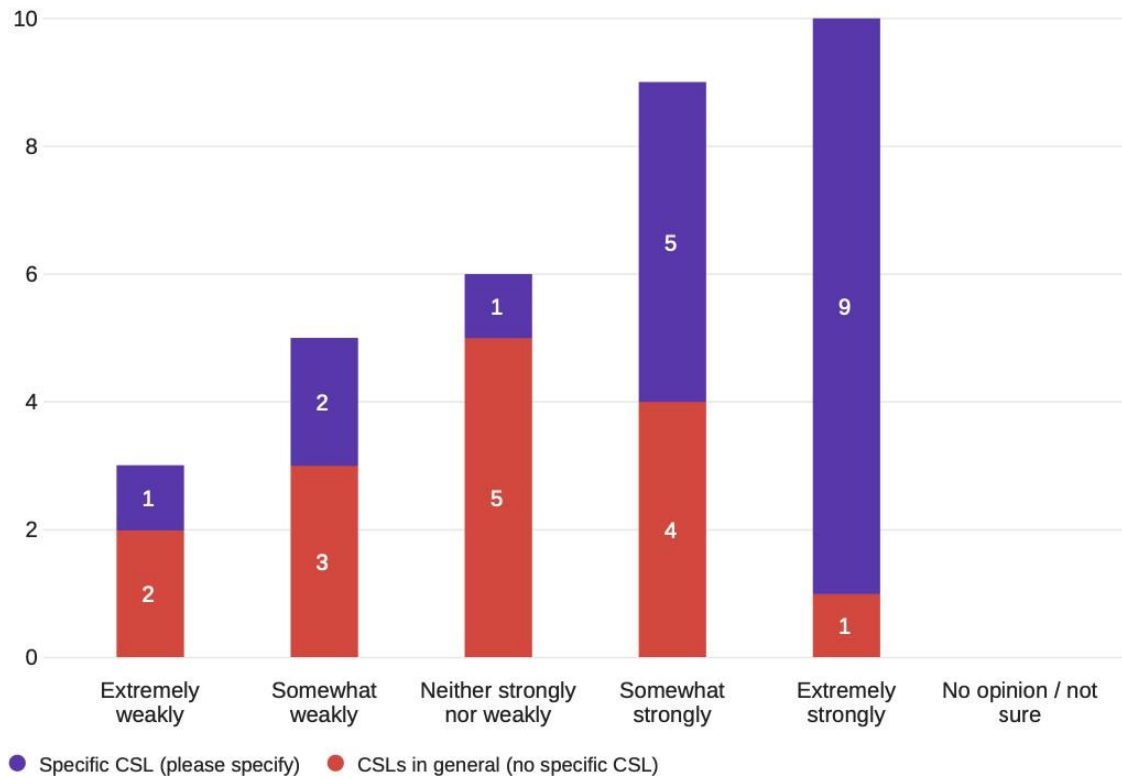


Figure 13: Stakeholders' thoughts on Stakeholder Engagement across specific and general CSLs.

### 3.3.5 Transparency

**Transparency** was described as: "A credible sustainability system makes important information publicly available and easily accessible, while protecting confidential and private information. It enables stakeholders to understand and evaluate the system's processes, decision-making, results, and impacts. Stakeholders have the information they need to actively participate in decisions or raise concerns". In terms of information availability and accessibility 60% of stakeholders in the sample scored positively (Figure 14). Again, most positive views were connected to specific CSLs, while CSLs in general had a higher percentage of "somewhat weakly" entries (Figure 14). The sample of critical voices both for extremely and somewhat weak included a varied group of researchers, NGOs, a certification support consultant, a certification body, and a



policy maker, up to 21% of the total sample. The only concern on specific CSLs was that “(\_\_\_\_\_) is a growing scheme with little scale yet to publish anonymized data outside regulated reporting lines. It is rolling out its new IT-platform within 2023; prior to that its ability to share (anonymized) data structurally is limited.”, while the concerns for general CSLs were more numerous: ”, while the concerns for general CSLs were more numerous: ”, while the concerns for general CSLs were more numerous:

*“Transparency is there but much more can be done to allow easy access to the criteria and specific datasets and assess / compare alternative options available.”*

*“Frauds and penalties should be more transparently handled.”*

*“Very few poor and biased information is available.”*

*“I am not confident that real transparency is part of the playbook.”*

*“I think the industry is hesitant to be really transparant. Not per se that they want to cover up bad practice, but they fear information being used against them. Many stakeholders are not operating in good faith, especially in the bioenergy debate.”*

Overall, these statements suggest that there is a lack of information disclosure among CSL, also since the information required for effective is sensitive to critique, especially if self-reported.

Q20 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the TRANSPARENCY credibility principle?

33 Responses

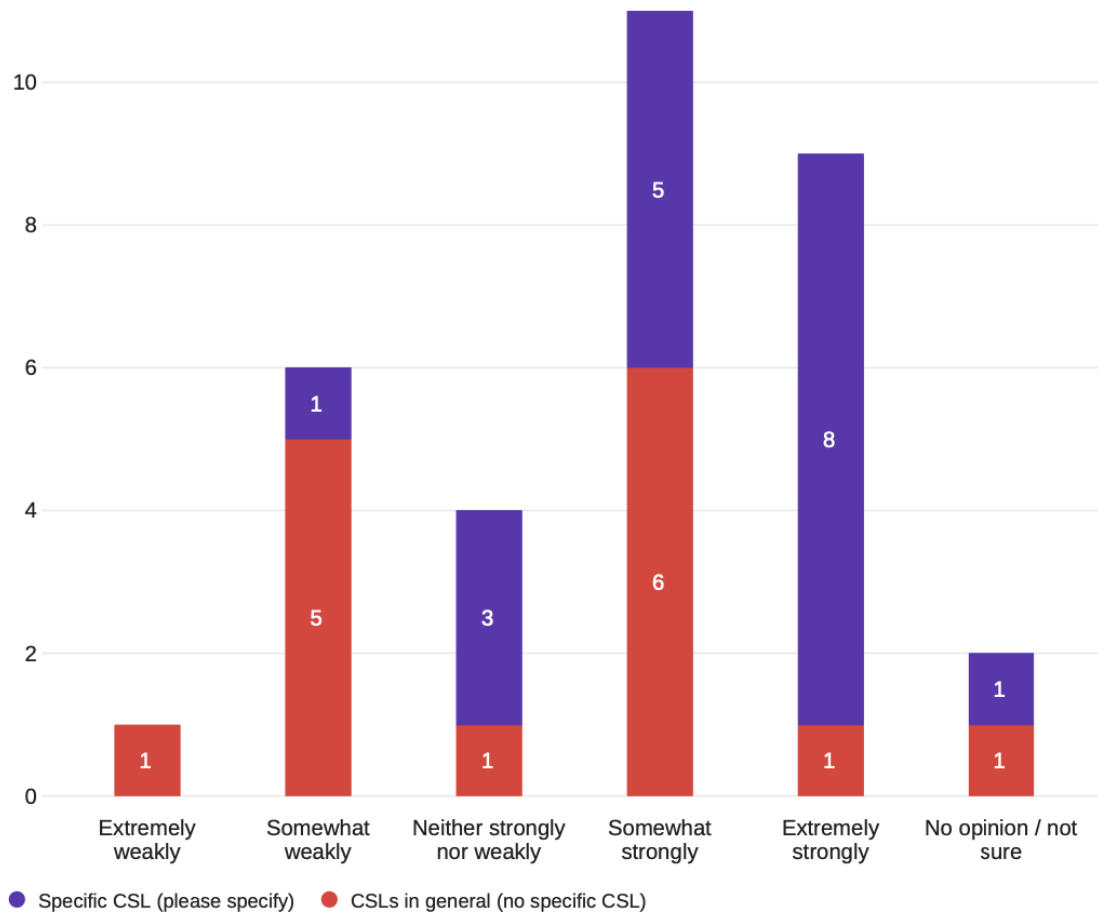


Figure 14. Stakeholders' thoughts on how CSLs follow the Transparency principle across specific and general CSLs.

### 3.3.6 Impartiality

**Impartiality** covers aspects of integrity while managing conflict, in the survey presented as: "A credible sustainability system identifies and avoids or mitigates conflicts of interest throughout its governance and operations, particularly when it comes to assessing its users' performance. Transparency and stakeholder engagement help ensure the system's integrity can be trusted" While 30% of stakeholders supported the "somewhat strongly" entry, the difference between the second most voted entries, respectively "neither strongly or weakly" (21%) or "extremely strongly" (24%) is negligible (Figure 15). The negative entries also add up to 24% of the sample. The sample

of each entry is varied, although NGOs are most present on the negative side of the spectrum, while sustainability certification schemes and certification bodies appear on the positive side of it. Researchers and bio-based manufacturers have contrasting views among them. Once more, stakeholders are more satisfied with specific CSLs rather than general ones (Figure 15). The following statements are used against specific CSLs' lack of impartiality:

*“These certification systems are inherently corrupt at multiple levels. Standards are set by the industry itself, which can bully NGOs into accepting them through their superior manpower and funding and the threat of not using the standard. Auditors are directly hired by the audited companies and hence have no independence and can only make cosmetic comments if they are to stay in business. Complaints are handled by the certification body which depends on the industry for funding so are systematically dismissed, underplayed or handled with extreme slowness.”*

*“As they develop their own standard they are affected by lobbying and tend to bend their own principles to gain new markets. I truly believe in an international standard and/or legislation to guide.”*

*“It is not independent enough.”*

*“The round table that develops the standard is driven by the main businesses. There is no real participation from worker representatives, like unions.”*

The following sentences are instead presented for general CSLs:

*“I don't see impartiality in the development and implementation of CSL, there are preconceptions on certain feedstocks without considering all the effects of biorefinery transformations. I don't see the alarming results coming out from different research paid by the EU being seriously considered and taken into account for new CSL.”*

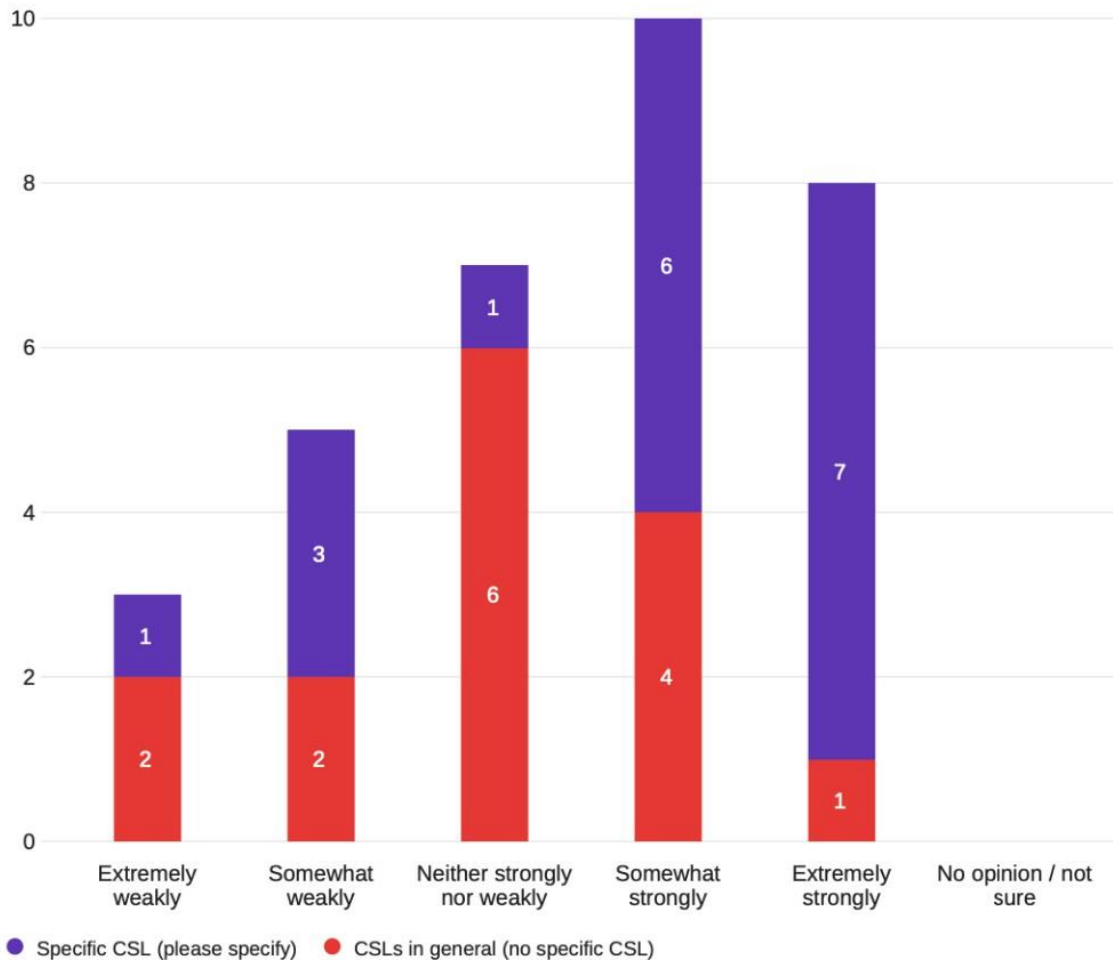
*“Influence of big industrial stakeholders is large in some schemes. Also, it would be beneficial to separate dependency between auditor and auditee, for more credible and impartial audits.”*

*“There is a vested interest in the success of a certified product, so I am not sure this can be regarded as all that credible.”*

Despite the relatively low amount of criticism, the comments provided by the respondents are quite concerning. What emerges from the results reported here is the recurrent problem of high influence of industry on the whole certification process, which respondents consider to contribute to corruption. The lack of credible separation between certification bodies and industry in a legislative framework creates reliance on the funding of the industry for the certification survival. This means that the underlying interests in the relationship between auditor and auditee influence the certification process too much.

**Q22 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the IMPARTIALITY credibility principle?**

33 Responses



*Figure 15: Stakeholders' thoughts on how CSLs follow the Impartiality principle across specific and general CSLs.*

### 3.3.8 Reliability

**Reliability** is defined as consistency between assessment tools that support the claims of CSLs. The prompt used in the survey for this principle was: “A credible sustainability system designs its tools so that these can be consistently implemented and assessed. It ensures assessments of users’ sustainability performance are competent and accurate, and that these assessments support any claims it allows users to make”. Overall, a positive perception towards this principle across a variety of stakeholders (54%) was detected, as can be seen in Figure 16. NGOs leaned towards the negative side of the spectrum, while certification bodies and schemes were mostly present on the positive side, and researchers and bio-based manufacturers had multiple scattered perceptions within the same group (see Appendix B). While 27% of the stakeholders have a neutral opinion, 24% have a negative perception of this principle’s applicability in CSLs. Additionally, specific CSLs also have a higher positive impact, compared with general CSLs which score the highest in the neutral and positive stance (Figure 16). This pattern is recurring in the whole survey. Issues mentioned in relation to specific CSLs are:

*“There is virtually no accountability and the only thing that is reliable is the industry's ability to abuse the system. It is sufficient to say that in my experience when dealing with illegal logging, it is easier to get final judgment from a court of justice than to get a certificate suspended, let alone cancelled.”*

*“Unlike (\_\_\_\_\_) there are very many exceptions to satisfy some big players.”*

*“There is high risk that dominant stakeholders can push and influence how (\_\_\_\_\_) rules are implemented and interpreted.”*

*“It is not reliable in the sense that unsustainably produced biomass is certified despite critics raised awareness to (\_\_\_\_\_) of these flaws.”*

Issues discussed for general CSLs are:

*“Reliability is very poor, many of the factor's formulas etc are not based on science. Many CSL rely on forecast models results that were created to study scenarios and not predict the future.”*

*“I think that many CSLs fail to accurately assess their members due to a lack of resources or well functioning methodology.”*

*“More harmonization needed across schemes, in determining sustainability or calculating CO2 reduction in the value chain.”*

In summary, there seems to be a lack of soundness in the statements affirming that certified products scientifically contribute to sustainability. The methodology used to assess schemes is not uniform and coherent across certifications. Moreover, it is difficult to trace the reliability of information along the value chain, as well as to disprove untruthful claims due to the high power of dominant stakeholders.

Q24 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the RELIABILITY credibility principle?

33 Responses

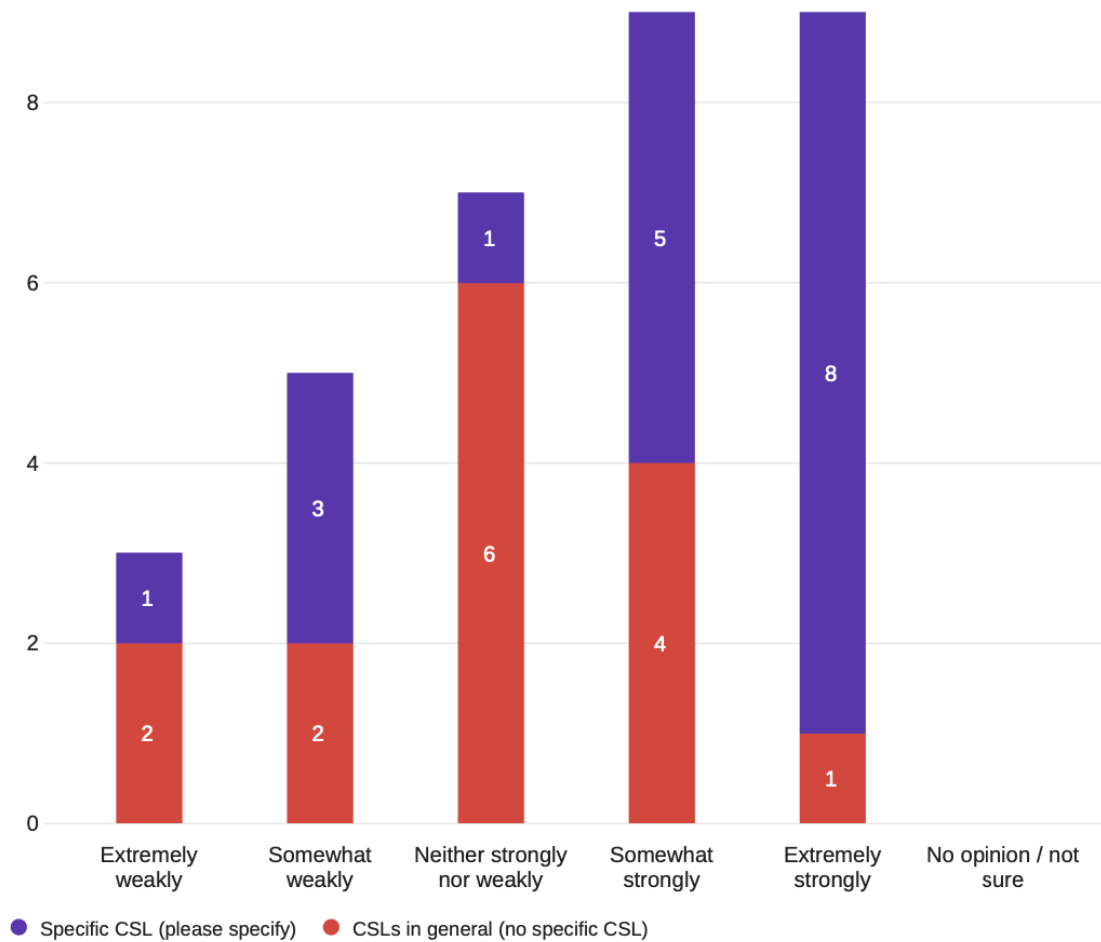


Figure 16. Stakeholders' thoughts on how CSLs follow the Reliability principle across specific and general CSLs.

### 3.3.9 Truthfulness

The principle of **Truthfulness** concerns greenwashing and the ability of CSLs to substantiate their claims with data and evidence. In the survey, Truthfulness was defined as: “A credible sustainability system substantiates its claims. Any claims the system or its users make are clear, relevant, and can be checked. They enable customers and other stakeholders to make informed choices. The scope and design of the system is accurately reflected in any claims, ensuring these are not misleading. Claims about sustainability impacts are backed up with data and evidence that is publicly available.” Again certification schemes and bodies were quite optimistic about this principle being covered in CSLs (54%, see Appendix B). 67% of the researchers agreed with this position, although other researchers had a neutral or even negative vision on this aspect. With them are NGOs, a consultant, a bio-based producer, and a private consumer, summing up to 24% of the respondents. Once more, general CSLs are more criticized than specific CSLs that seem to be perceived as strongly addressing the trustfulness principle (Figure 16). Taken together, these concerns were about CSLs hiding the negative impacts that certified practices have on the environment through propaganda and greenwashing. This is due to the lack of independency of the certifying organizations, which need more industries to join their schemes but do not have enough leverage to control their practices. For specific CSLs the below statements were entered in the survey:

*“In every policy debate I have participated in about forest protection, biomass, protected areas, etc, forest certification has invariably been used as an argument against biodiversity conservation and climate action. The key to such toxic lobby is that the fact that the forest is certified as “sustainably managed” is used to negate actual problems such as ongoing biodiversity loss or degradation of the carbon sink. The forest lobby uses forest certification for blatant lies and shameless propaganda, but I have never seen the certification bodies calling them out.”*

*“Same as previous, as an “independent” organization policies and standards may be changed by majority decisions.”*

For specific CSLs the concerns were:

*“The results of propaganda etc of CSL confuse the customers and hide from those indirect impacts caused on the whole production and transformation industry of biomass.”*

*“Too much greenwashing still prevails so that claims are not always justified by truly sustainable actions/steps taken.”*

*“It is not clear where transparency ends and truthfulness begins, they are two sides of the same coin. My view is the same as for truthfulness.”*

*“There are many CSL that have been identified as “greenwashing” activities which reduces the truthfulness of certified goods.”*

*“I think that there is a lot of leeway with what is true. How do CSLs monitor or check up on their members is a key part of truthfulness. There are examples of CSLs being easy to join but those who have joined actually don't change their behaviours that much.”*

Q26 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the TRUTHFULNESS credibility principle?

33 Responses

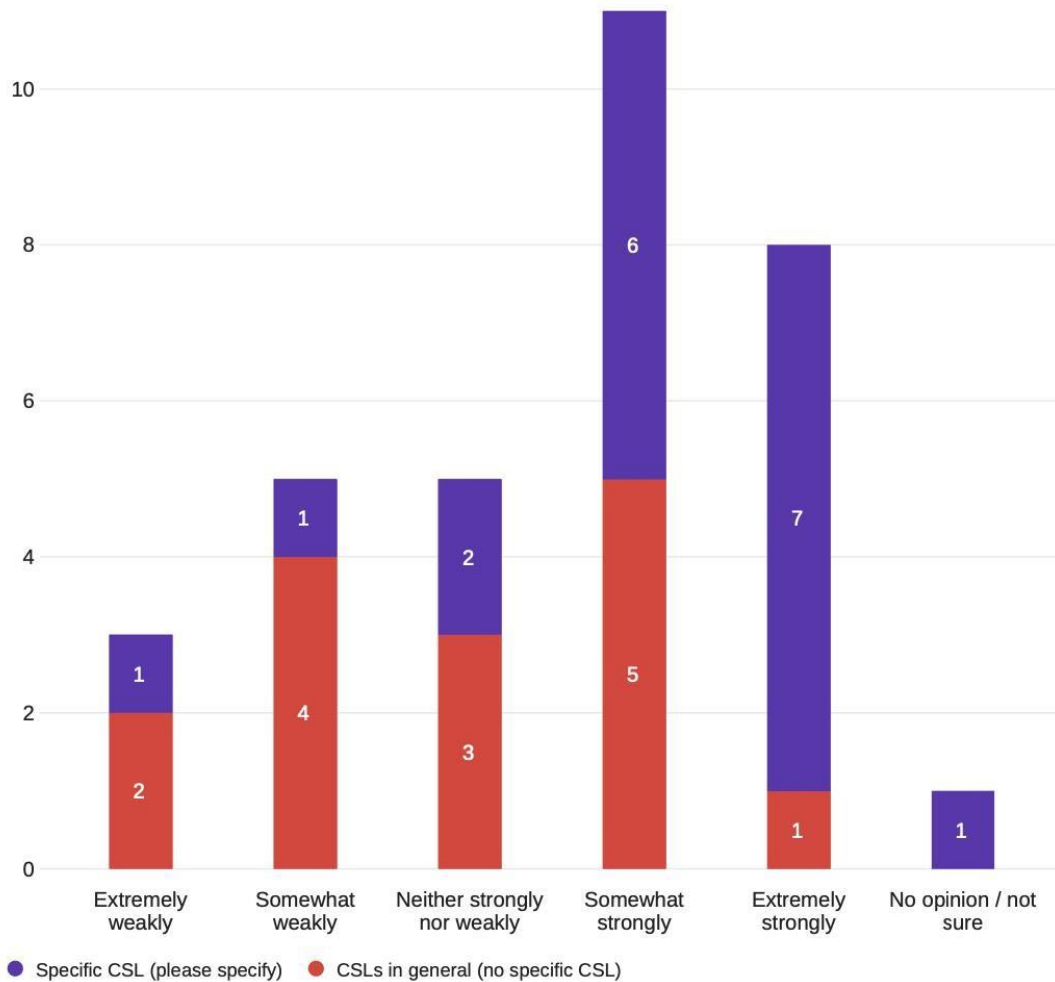


Figure 17: Stakeholders' thoughts on how CSLs follow the Truthfulness principle across specific and general CSLs.



### 3.3.10 Continual Improvement

The final principle investigated was **Continual Improvement**, in terms of continuous feedback systems that adapt lessons-learned to the CSLs. The survey described this principle in such words: “A credible sustainability system regularly reviews its objectives, its strategies, and the performance of its tools and system. It evaluates the impacts and outcomes of its activities. It applies the lessons learned to improve. It responds to new evidence, stakeholder input, and external changes, adapting its strategies to improve its impacts and remain fit for purpose”. 39% of the stakeholders “somewhat strongly” agreed that CSLs reflect this principle (Figure 18). This number included all stakeholders except certification support consultant, which however was represented in the second most chosen option “extremely strongly” (24% of entries). 15% of stakeholders had a neutral opinion on Continual Improvement, while another 15% of the stakeholders had a critical opinion on this aspect: 3 NGOs, a researcher, and a certification support consultant, with their concerns being mostly on general CSLs (Figure 18), namely:

*“Evaluation should be more thorough and regular, too often the evaluation of progress is based on voluntary declarations rather than on verified and implemented steps.”*

*“Some CSLs have clear continuous improvement processes, but others don't. Lack of harmonisation in definitions and sustainability criteria across CSLs is sometimes a barrier for their continuous improvement.”*

*“By all the causes I already mentioned I don't see progress or improvements since they insist in not considering the systemic characteristic of biomass production and transformation they persist on the wrong pathway.”*

In contrast, one stakeholder said *“Debates on improving the functioning of both schemes have been dragging for decades. But improvements always prove awfully inadequate. After 3 decades the schemes cannot even prevent plain illegal logging, while they have facilitated the further spread of clear cutting, old growth logging and replacement of native forest with plantations to a number of countries.”* while thinking of a specific CSL.

The skeptic stakeholders would like to have a clearer criterion as a base for mandatory reporting of continuous progress. In their opinion, due to lack of this system in place, so far, the improvements of CSLs have not led to desired outcomes.

Q28 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the CONTINUAL IMPROVEMENT credibility principle?

33 Responses

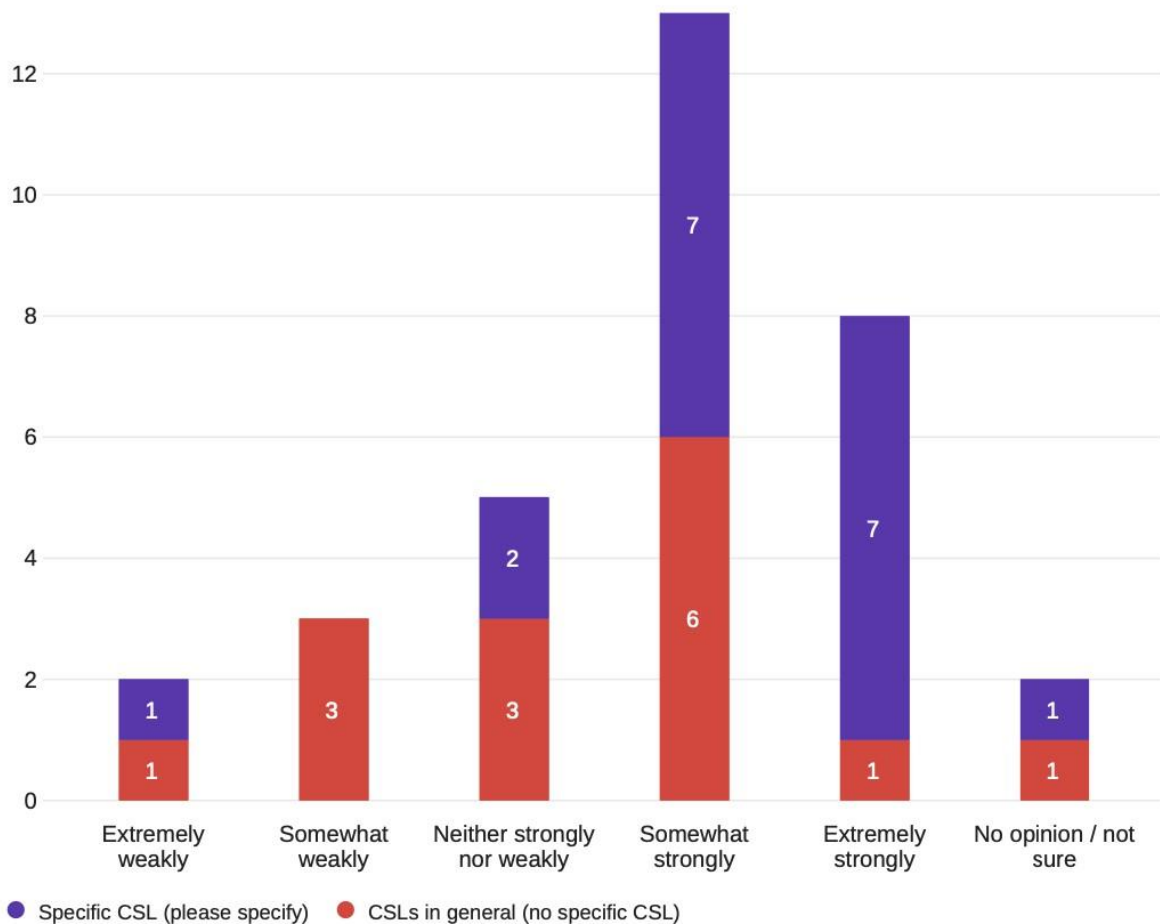


Figure 18: Stakeholders' thoughts on how CSLs follow the Continual Improvement principle across specific and general CSLs.

### 3.4 In depth interviews

Thirteen stakeholders left their contact details for a follow-up interview on their perceptions of CSLs, mostly NGOs. The interviews will be conducted after the EUBCE workshop in Bologna. The interview guide will be shaped by the results of the survey as well as the consultation workshop that will take place at the conference. The results will also be used to inform the design of the joint monitoring system.

### **3.4.1 Update on the in-depth interview (29/11/2023)**

After completing the online survey, we reached out to stakeholders who had provided their contact information and invited them to participate in an interview. The purpose of the interview was to delve deeper into the concerns raised by stakeholders in the survey, specifically focusing on five topics: sustainability impacts, measurable progress, value creation principles, limitations of CSLs and the role of CSLs for the EU Bioeconomy. The insights gained from the discussions on measurable progress and value creation principles are particularly relevant to developing the monitoring system for CSLs in WP 5 and the cost-benefit analysis in WP 6.

Out of the thirteen stakeholders contacted, five were able to participate in the interview sessions, which took place in August 2023. Additionally, we also sought the perspective of one stakeholder from our network who held relevant experiences and insights to fill gaps in our analysis and further provide a more comprehensive view of the topic. Further details and insights from the interviews can be found in the Appendix D.



This project has received funding from the European Union's Horizon Europe research and innovation programme under grant agreement N° 101060133

## 4 CONCLUSIONS AND NEXT STEPS

### 4.1 Conclusions

In summary, based on the results, it can be concluded that the majority of the respondents had a (moderately) positive view to the functioning of CSL's. About one quarter of the respondents (varying somewhat per question) perceived the functioning of CSL to be (very) weak. In particular, two respondents ranked the CSLs consistently to be very weak on (almost) all aspects. On the other hand, a majority of respondents ranked the functioning of the CSL as (very) strong, and this support was usually shared by a wide variety of stakeholder groups. However, despite the general positive picture, the comments given by stakeholders on some principles entail quite concerning points that should be considered for the development of a better CSLs framework (which was also the main aim of this consultation). Moreover, responses from two stakeholder groups (traders and purchasers of certified products) are entirely missing so far, and overall, the total number of responses should still be increased. Therefore, the outcome of this survey and its interpretation need to be treated with caution.

With regard to the use of CSL as a co-regulation instrument, the majority of stakeholders affirmed that "It should be mandatory for industry to obtain sustainability certification and labelling, and the EU should regulate CSLs", meaning that co-regulation by the EU might be widely welcomed by more than half of the stakeholders that took part in this consultation. This is a clear message, also supporting the further development of a joint monitoring system for CSLs and using CSLs as coregulation instruments. At the same time, the concerns about proliferation of CSLs and weak system/audit rules are clearly also concerns shared by a large number of varied stakeholders which should be addressed.

While the majority of respondents ranked certification schemes as (very) strong for all ISEAL credibility principles, there is certainly also room for further improvement. From the individual comments received by the critical respondents, a number of overarching criticisms emerged for CSL of biobased systems:

- The sustainability coverage of many CSLs is limited, and in some cases, they may be insufficient to at least incidentally prevent degradation of, e.g. biodiversity.
- The level of ambition of some CSLs was criticized to remain relatively low and therefore not drive positive social, environmental, and economic impacts. This links also to the (lack of) continuous improvement, which is criticized as being too slow or inadequate.
- Impacts are also rarely measured / quantified – often because strict metrics to measure performance are missing in the first place.

- The internal control of compliance through auditors is hampered by the fact that auditors are financially dependent on the entity they certify - which creates a conflict of interest.
- The external control of violations of certified producers is (unofficially) put on NGO's who have not asked for this responsibility nor often have the resources to do so effectively.
- As for stakeholder engagement, the strong role of industry and lack of participation of NGOs and indigenous people in many CSLs was highlighted. Often Stakeholders are also invited, but often lack funds or commitment to participate. This (and the previous) bullet also indicate hidden, indirect cost of CSL's.
- The strong role of industry in some CSL's could also impact impartiality, as well as the above-mentioned conflicts of interest between auditors, certification bodies and certification system owners on the one hand and organizations certified on the other. With regard to transparency, the main criticism is that only limited amounts of data are reported, which are also not easy to access.
- Reliability of CLS also varies, as the methodology used to assess schemes is not uniform and coherent across certifications. Moreover, it is difficult to trace the reliability of information along the value chain, as well as to disprove untruthful claims due to the high power of dominant stakeholders.
- Insufficient truthfulness of CSL is also criticized as it may be used for greenwashing of products, although this may not always be the fault of the CSL itself.
- While collaboration and value creation were also criticized, this criticism was somewhat less pronounced and motivated than for other ISEAL principles.

These observed criticisms are a summary of the more detailed feedback received during the consultation. It is based on a limited number of responses, and should therefore be not seen as universally true, but concerns voiced by individuals. These viewpoints will be assessed in detail during in-depth interviews to explore in how they are also shared by a wider set of stakeholders.

## 4.2 Next steps

The results of this stakeholder consultation will be presented at the European Biomass conference and Exhibition (EUBCE) in June 2023 in Bologna, Italy. They will feature both in an oral presentation during a regular session of the conference, and during a dedicated workshop organized together with the STAR4BBS and SUSTCERT4BIOBASED projects. During this workshop, also a roundtable will be held with representatives from amongst others certification systems (ISCC, RSB) and EU policy makers. The participants of the roundtable will be asked to comment on the preliminary results of the consultation and on using CSL's as a co-regulation instrument. Also, the possibility to participate in the online survey until the end of June will be highlighted once more. In addition, an additional campaign will be started to invite especially stakeholder groups with low response rates. Also, a wider geographical coverage of stakeholders is aimed for.

In addition, based on the responses received, also a number of in-depth interviews with critical stakeholders will be conducted to gain further insights in the underlying causes of criticism and to explore possible mitigation measures.

All input received on current weaknesses and possible mitigation options will be used to design the (joint) monitoring system in Task 5.1. The aim is also to publish the final survey results, together with input received during the EUBCE 2023 roundtable and the in-depth interviews in a peer-reviewed open access scientific journal. These results will also all be used to inform the design of the joint monitoring system over the second half of 2023.

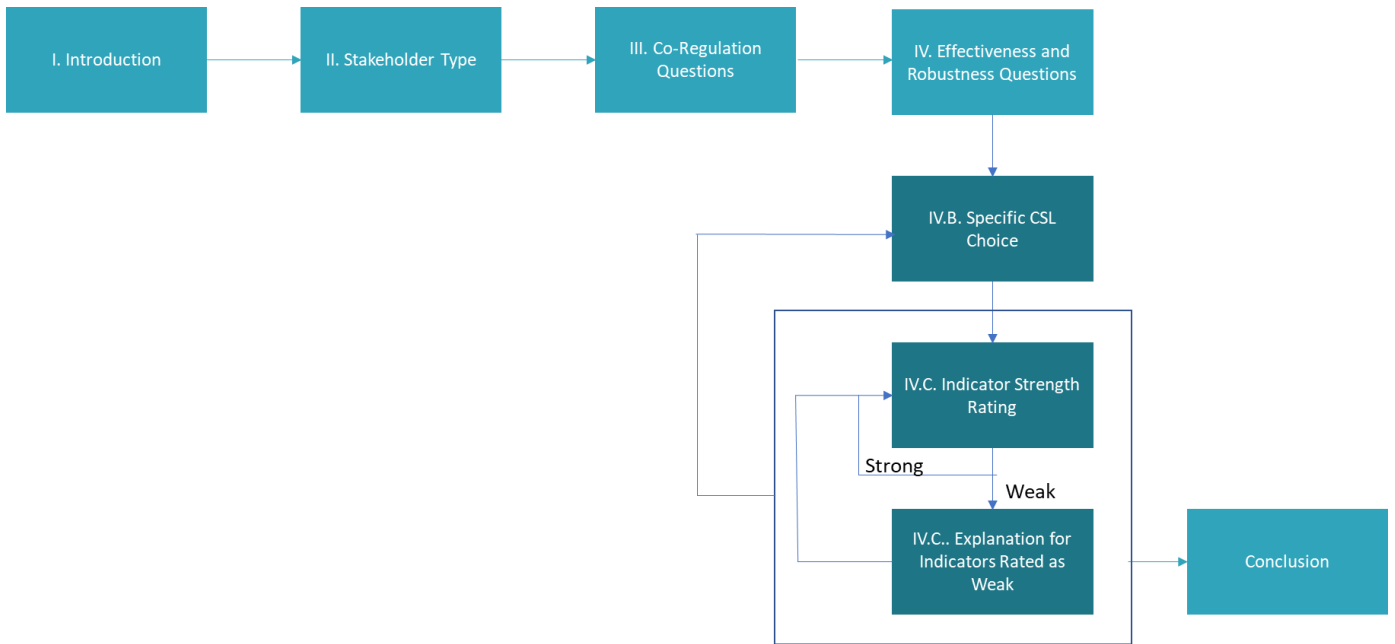
## 5 REFERENCES

ISEAL (2021) ISEAL credibility principles. Version 2. June 2021. Available at :  
[https://www.isealalliance.org/sites/default/files/resource/2021-06/ISEAL-Credibility-Principles-V2-2021\\_EN\\_ISEAL\\_June-21.pdf](https://www.isealalliance.org/sites/default/files/resource/2021-06/ISEAL-Credibility-Principles-V2-2021_EN_ISEAL_June-21.pdf)

## 6 APPENDICES

### Appendix A. Survey questionnaire

# HARMONITOR Survey Draft



## 1 Introduction

The [HARMONITOR project](#), in collaboration with [STAR4BBS](#) and [SUSTCERT4BIOBASED](#), under Horizon Europe funding, is conducting research on the perception of stakeholders concerning the effectiveness and robustness of sustainability certification schemes and labels (CSLs) for bio-based products. These CSLs can be used as a co-regulation instrument in the European Union bioeconomy.

The HARMONITOR project focuses on bio-based materials including, for example, innovative bio-based chemicals, forestry products for construction materials, and textiles. Food and energy products are excluded explicitly, although versatile upstream biomass feedstocks that can lead to both materials and energy/food are included, e.g., palm oil, wood, cotton, and wastes as feedstocks.

This survey and the results are anonymous and the only demographic data collected is the stakeholder category you belong to.

This survey should take between x and y minutes.



## 2 Stakeholder Type – Which stakeholder category most accurately describes you? Choose one.

- Sustainability certification scheme and/or label owner organization that develops standards
- Certification body that certifies/audits standards
- Bio-based product manufacturer that pursues or may pursue obtaining certification and labeling for their products
- Business or public sector purchaser of certified and/or non-certified products
- Trader of goods
- Certification support consultant
- Researcher (academic or otherwise)
- Human-rights non-governmental organization
- Environmental non-governmental organization
- Policy maker
- Private consumer (general public)
- Other, please specify

## 3 Bio-Based Product Sustainability Certification Schemes and Labels as Potential Co-Regulation Tools

### 3.1 Introduction

3.1.1 Sustainability certification schemes and labels (CSLs) are used in the European Union (EU) as a co-regulation instrument, particularly in the bioeconomy.

*3.1.1.1 Sustainability – In the context of CSLs, sustainability tends to focus on environmental, social, and/or economic improvement indicators*

*3.1.1.2 Certification scheme and label – In the context of this survey, it could include product or feedstock certifications or labels from organizations like the Forest Stewardship Council, Bonsucro, the Better Cotton Initiative, the EU Ecolabel, and many more*

*3.1.1.3 Co-regulation -In the context of this survey, co-regulation means that legislation allows and/or promotes the use of certification schemes and labels for demonstration of compliance of mandatory or recommended sustainability requirements*

*3.1.1.4 Bioeconomy - the part of the economy that produces energy, goods, and services from renewable biological resources that are cultivated or wild, including forests, crops, animals, and micro-organisms*

*3.1.1.5 Bio-based chemicals and materials – a subset of the output of the bioeconomy that excludes energy, services, food, and feed*

3.2 In the following questions, we want to know (1) your perspective on the perceived benefits and limitations of CSLs as co-regulation instruments. (2) how familiar you are with sustainability CSLs as a co-regulation instrument in the EU, (3) your opinions on how CSLs should be used as co-regulation instruments

3.3 In your opinion, what are the advantages of sustainability certification schemes and labels (CSLs) for the future development of the European Union (EU) bioeconomy? Select one or more answers.

3.3.1 CSLs can provide consumers with reliable and verified information on the sustainability performance of products and services

3.3.2 CSLs can encourage responsible production and consumption

3.3.3 Sustainability issues and public concerns that are not yet regulated by current policy can be addressed by CSLs

3.3.4 CSLs can give flexibility to industry by allowing them to choose the level of sustainability ambition they wish to achieve

3.3.5 Others (please specify)

3.3.6 No advantages

3.4 In your opinion, what are the limitations of sustainability certification schemes and labels (CSLs) for the future development of the European (EU) bioeconomy? Select one or more answers.

3.4.1 Weak system/audit rules may result in poor levels of sustainability assurance, thus damaging the overall credibility of the sustainability certification

3.4.2 CSLs owners are the final decision makers and may prioritize their own business goals over sustainability goals or policy objectives

3.4.3 Industry pays both the CSL and the auditor, which may cause dependencies

3.4.4 A proliferation of CSLs may cause confusion for industry and consumers

3.4.5 Others (please specify)

3.4.6 No limitations

3.5 For the following directives in the European Union (EU), how familiar are you with the use of certification schemes and labels (CSLs) as co-regulation instruments within each directive? (for each, “Not familiar at all” to “Extremely familiar”)

3.5.1 In general (no specific directive in mind)

3.5.2 EU Renewable Energy Directive - The Renewable Energy Directive (RED and REDII) has set sustainability requirements (GHG reduction, use of land, protection of biodiversity) for biofuels, bioliquids and biomass for energy. It has also set a mechanism for the use of product certification schemes for demonstrating compliance with those sustainability requirements.

3.5.3 EU Timber Regulation - The EU Timber Regulation (EUTR) establishes obligations to counter illegal logging on companies that place or buy timber and timber products on the EU market. Sustainability certification is the most common method used by industry to inform risk mitigation actions.

3.5.4 Green Public Procurement – The purchase of supplies and services by the government for internal use that prioritizes reducing the impact of those products and services on human health and the environment

3.5.5 Other (please specify)

3.6 In your opinion, how should sustainability certification schemes and labels (CSLs) be used as a co-regulation instrument in the European Union (EU) for bio-based chemicals and materials? Choose one.

3.6.1 Mandatory for industry to obtain sustainability certification and labeling but the EU should NOT regulate CSLs

3.6.2 Mandatory for industry to obtain sustainability certification and labeling and the EU should regulate CSLs

3.6.3 Voluntary for industry to obtain sustainability certification and labeling and the EU should NOT regulate CSLs (fully voluntary)

3.6.4 CSLs should NOT be used as a co-regulation instrument – The EU should fully regulate the sustainability of bio-based products without the use of CSLs

3.6.5 Other (please specify)

3.6.6 Not sure/no opinion

## 4 Effectiveness and Robustness of Bio-Based Product Sustainability Certification Schemes and Labels

### 4.1 Introduction

4.1.1 The ISEAL Credibility Principles provide guidance for certification schemes and labels (CSLs) on what credible and effective sustainability systems look like. There are ten credibility principles:

*4.1.1.1 Sustainability Impacts*

*4.1.1.2 Collaboration*

*4.1.1.3 Value Creation*

*4.1.1.4 Measurable Progress*

*4.1.1.5 Stakeholder Engagement*

*4.1.1.6 Transparency*

*4.1.1.7 Impartiality*

*4.1.1.8 Reliability*

*4.1.1.9 Truthfulness*

*4.1.1.10 Continual Improvement*

4.1.2 For the next questions, the full description of each principle will be given. Think about the CSLs you are familiar with that are relevant to bio-based chemical and materials. This could include certifications for biomass feedstocks. With a particular CSL in mind, please rate how strongly you think that CSL follows that credibility principle.

4.2 Which certification scheme and/or label (CSL) do you have in mind? (drop-down list or respondent entry)

4.2.1 CSLs in general (no specific CSL)

4.2.2 Specific CSL (please specify)

4.3 With X in mind, how strongly do you think that X follows the Sustainability Impacts credibility principle? (1-5 + no opinion)

4.3.1 If rated weak (1-2), why? (open text)

- 4.3.2 If rated above 2, skip to next principle
- 4.4 With X in mind, how strongly do you think that X follows the Collaboration credibility principle? (1-5 + no opinion)
  - 4.4.1 If rated weak (1-2), why? (open text)
  - 4.4.2 If rated above 2, skip to next principle
- 4.5 With X in mind, how strongly do you think that X follows the Value Creation credibility principle? (1-5 + no opinion)
  - 4.5.1 If rated weak (1-2), why? (open text)
  - 4.5.2 If rated above 2, skip to next principle
- 4.6 With X in mind, how strongly do you think that X follows the Measurable Progress credibility principle? (1-5 + no opinion)
  - 4.6.1 If rated weak (1-2), why? (open text)
  - 4.6.2 If rated above 2, skip to next principle
- 4.7 With X in mind, how strongly do you think that X follows the Stakeholder Engagement credibility principle? (1-5 + no opinion)
  - 4.7.1 If rated weak (1-2), why? (open text)
  - 4.7.2 If rated above 2, skip to next principle
- 4.8 With X in mind, how strongly do you think that X follows the Transparency credibility principle? (1-5 + no opinion)
  - 4.8.1 If rated weak (1-2), why? (open text)
  - 4.8.2 If rated above 2, skip to next principle
- 4.9 With X in mind, how strongly do you think that X follows the Impartiality credibility principle? (1-5 + no opinion)
  - 4.9.1 If rated weak (1-2), why? (open text)
  - 4.9.2 If rated above 2, skip to next principle
- 4.10 With X in mind, how strongly do you think that X follows the Reliability credibility principle? (1-5 + no opinion)
  - 4.10.1 If rated weak (1-2), why? (open text)
  - 4.10.2 If rated above 2, skip to next principle

4.11 With X in mind, how strongly do you think that X follows the Truthfulness credibility principle? (1-5 + no opinion)

4.11.1 If rated weak (1-2), why? (open text)

4.11.2 If rated above 2, skip to next principle

4.12 With X in mind, how strongly do you think that X follows the Continual Improvement credibility principle? (1-5 + no opinion)

4.12.1 If rated weak (1-2), why? (open text)

4.12.2 If rated above 2, skip to next principle

4.13 Would you like to answer for another CSL?

4.13.1 If yes, repeat IV.B. through IV.L.

4.13.2 If no, skip to V

## 5 Conclusion

5.1 Please contact Martin Junginger ([h.m.junginger@uu.nl](mailto:h.m.junginger@uu.nl)) for any questions or comments about the survey or HARMONITOR project

5.2 Would you like to share your survey responses with us and be contacted for a follow-up interview? If you are okay with us seeing your survey responses and would like to share more of your thoughts, please leave your name and email address below. You will no longer be anonymous, but the information you provide is protected by the EU General Data Protection Regulation.

Appendix B. Stakeholders' thoughts on how CSLs follow each ISEAL credibility principle

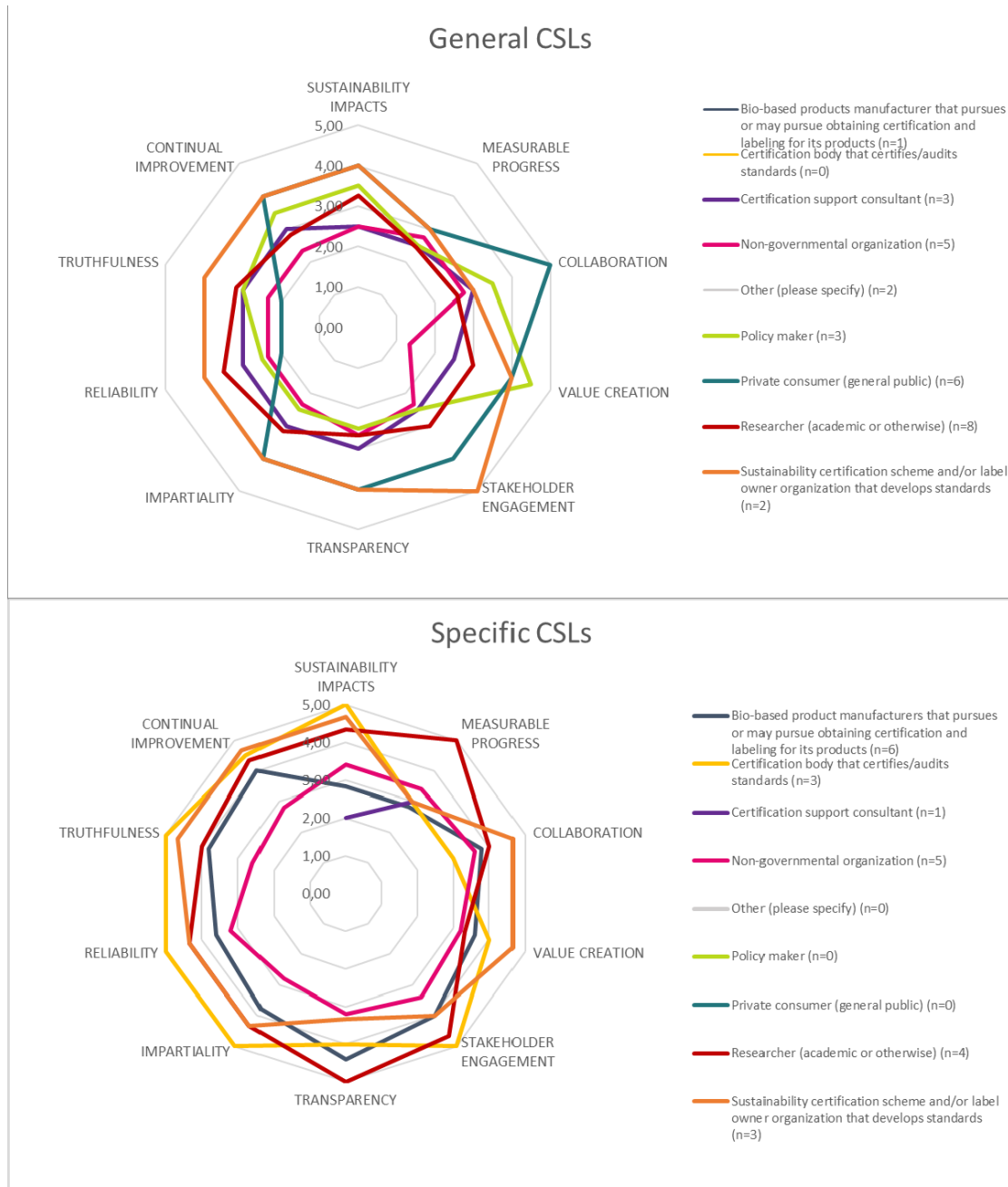


Figure B-1: Perceived performance of general CSLs (top) and specific CSLs (bottom) with regard to the ISEAL credibility principle according to various stakeholder groups on a scale 1-5 (1 = extremely weakly; 2 = somewhat weakly; 3 = neither weakly nor strongly; 4 = somewhat strongly; 5 = extremely strongly). Some stakeholder groups are underrepresented, therefore the depicted results are shown for information purpose only.

*Table B-1: Average score of each ISEAL principle for CSLs in general (top) and specific CSLs (bottom) by various stakeholder groups on a scale of 1-5 (1 = extremely weakly; 2 = somewhat weakly; 3 = neither weakly nor strongly; 4 = somewhat strongly; 5 = extremely strongly). Some stakeholder groups are underrepresented, therefore the depicted results are shown for information purpose only.*

Category	Number of stakeholder	SUSTAINABILITY IMPACTS	MEASURABLE PROGRESS	COLLABORATION	VALUE CREATION	STAKEHOLDER ENGAGEMENT	TRANSPARENCY	IMPARTIALITY	RELIABILITY	TRUTHFULNESS	CONTINUAL IMPROVEMENT
Bio-based products manufacturer that pursues or may pursue obtaining certification and labeling for its products	1										
Certification body that certifies/audits standards											
Certification support consultant	3	2,50	2,50	3,00	2,50	2,50	3,00	3,00	3,00	3,00	3,00
Non-governmental organization	5	2,50	2,75	2,75	1,33	2,33	2,67	2,33	2,33	2,33	2,33
Other (please specify)	2	4,00									
Policy maker	3	3,50	2,50	3,50	4,50	2,50	2,50	2,50	2,50	3,00	3,50
Private consumer (general public)	6	4,00	3,00	5,00	4,00	4,00	4,00	4,00	2,00	2,00	4,00
Researcher (academic or otherwise)	8	3,25	2,43	2,57	3,00	3,00	2,67	3,17	3,50	3,17	2,83
Sustainability certification scheme and/or label owner organization that develops standards	2	4,00	3,00	3,00	4,00	5,00	4,00	4,00	4,00	4,00	4,00
<b>Total stakeholder   Average score</b>	<b>30</b>	<b>3,20</b>	<b>2,61</b>	<b>2,94</b>	<b>2,94</b>	<b>2,93</b>	<b>2,87</b>	<b>3,00</b>	<b>3,00</b>	<b>2,93</b>	<b>3,00</b>

Category	Number of stakeholder	SUSTAINABILITY IMPACTS	MEASURABLE PROGRESS	COLLABORATION	VALUE CREATION	STAKEHOLDER ENGAGEMENT	TRANSPARENCY	IMPARTIALITY	RELIABILITY	TRUTHFULNESS	CONTINUAL IMPROVEMENT
Bio-based products manufacturer that pursues or may pursue obtaining certification and labeling for its products	6	2,83	2,83	3,80	3,60	4,00	4,40	3,80	3,60	3,80	4,00
Certification body that certifies/audits standards	3	5,00	3,00	3,00	4,00	5,00	4,00	5,00	5,00	5,00	4,50
Certification support consultant	1	2,00	3,00								
Non-governmental organization	5	3,40	3,40	3,60	3,20	3,40	3,20	2,80	3,20	2,60	2,80
Other (please specify)											
Policy maker											
Private consumer (general public)											
Researcher (academic or otherwise)	4	4,33	5,00	4,00	3,33	4,67	5,00	4,33	4,33	4,00	4,33
Sustainability certification scheme and/or label owner organization that develops standards	3	4,67	3,00	4,67	4,67	4,00	3,33	4,33	4,33	4,67	4,67
<b>Total stakeholder   Average score</b>	<b>22</b>	<b>3,65</b>	<b>3,35</b>	<b>3,83</b>	<b>3,67</b>	<b>4,06</b>	<b>3,94</b>	<b>3,83</b>	<b>3,89</b>	<b>3,78</b>	<b>3,89</b>





Q10 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the SUSTAINABILITY IMPACTS credibility principle?

40 Responses

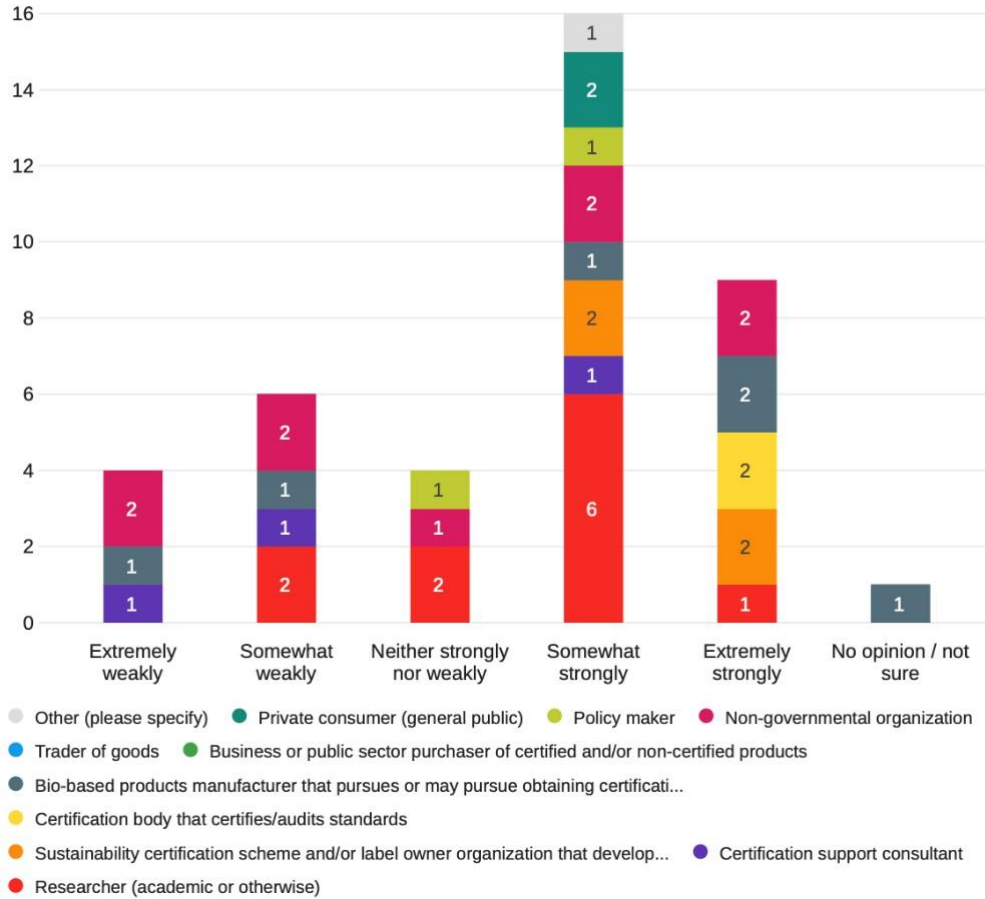
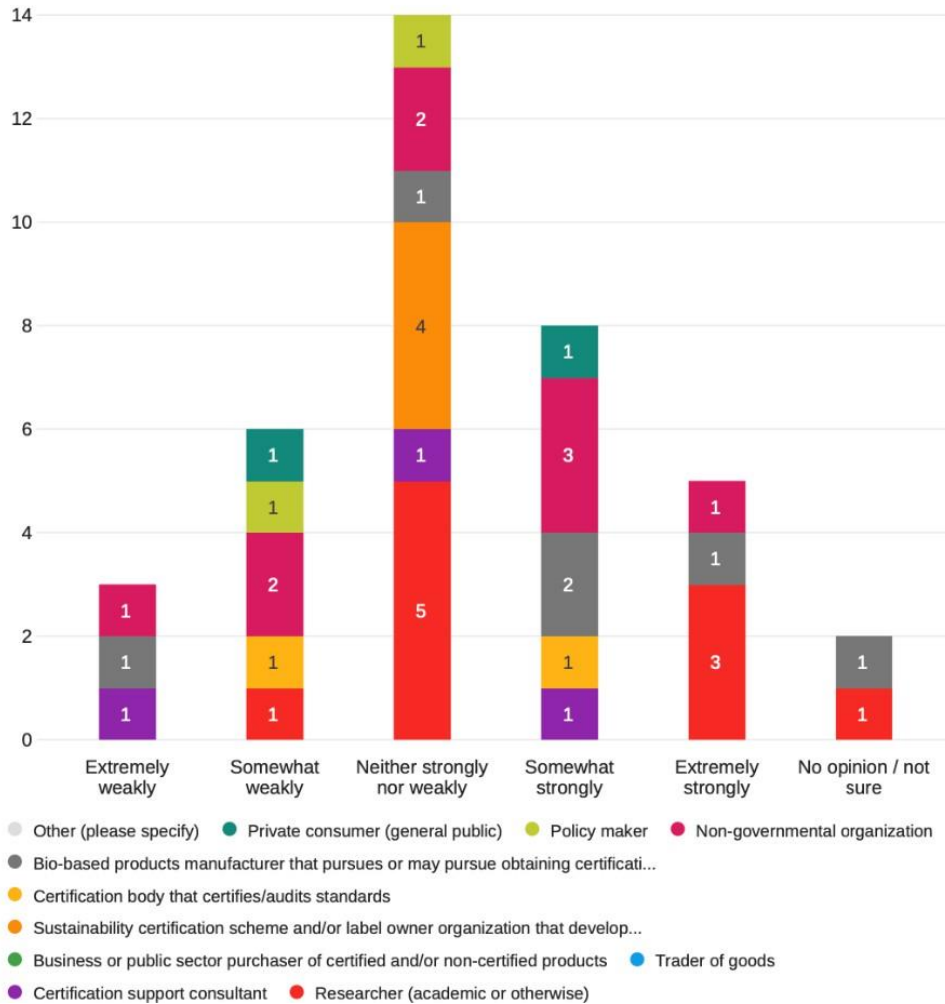


Figure B-2: Stakeholders' thoughts on Sustainability Impacts of CSLs.

Q16 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the MEASURABLE PROGRESS credibility principle?

38 Responses



Q16 - 2. MEASURABLE PROGRESS A credible sustainability system has tools that are relevant to achieving its sustainability objectives, and these tools allow progress towards objectives to be measured over time. It collects and analyses the data it needs to measure, understand, and demonstrate the progress its users are making towards these objectives. With [QID19-ChoiceGroup-SelectedChoicesTextEntry] in mind, how strongly do you think [QID19-ChoiceGroup-SelectedChoicesTextEntry] follows the MEASURABLE PROGRESS credibility principle?

38 Responses

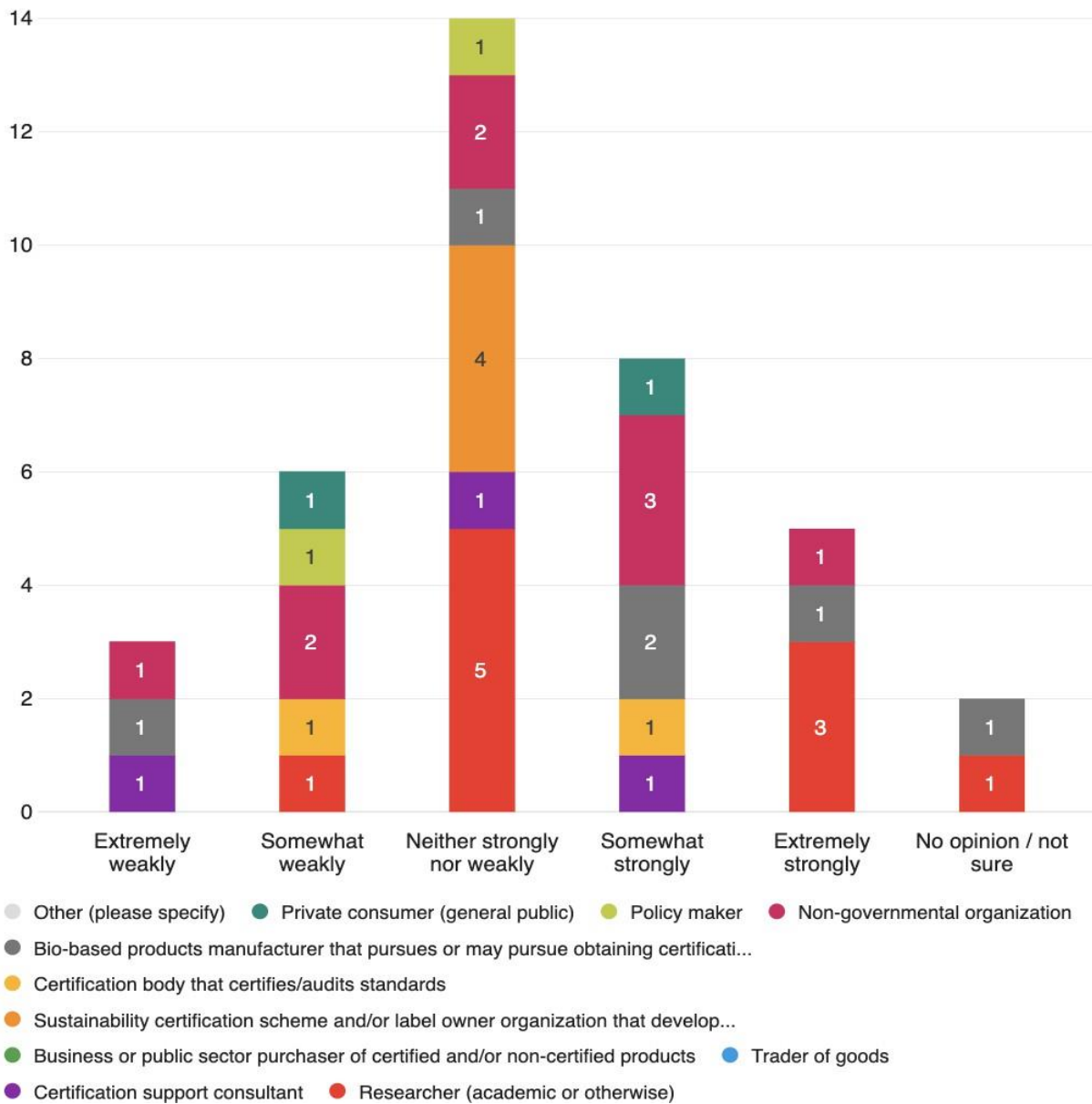
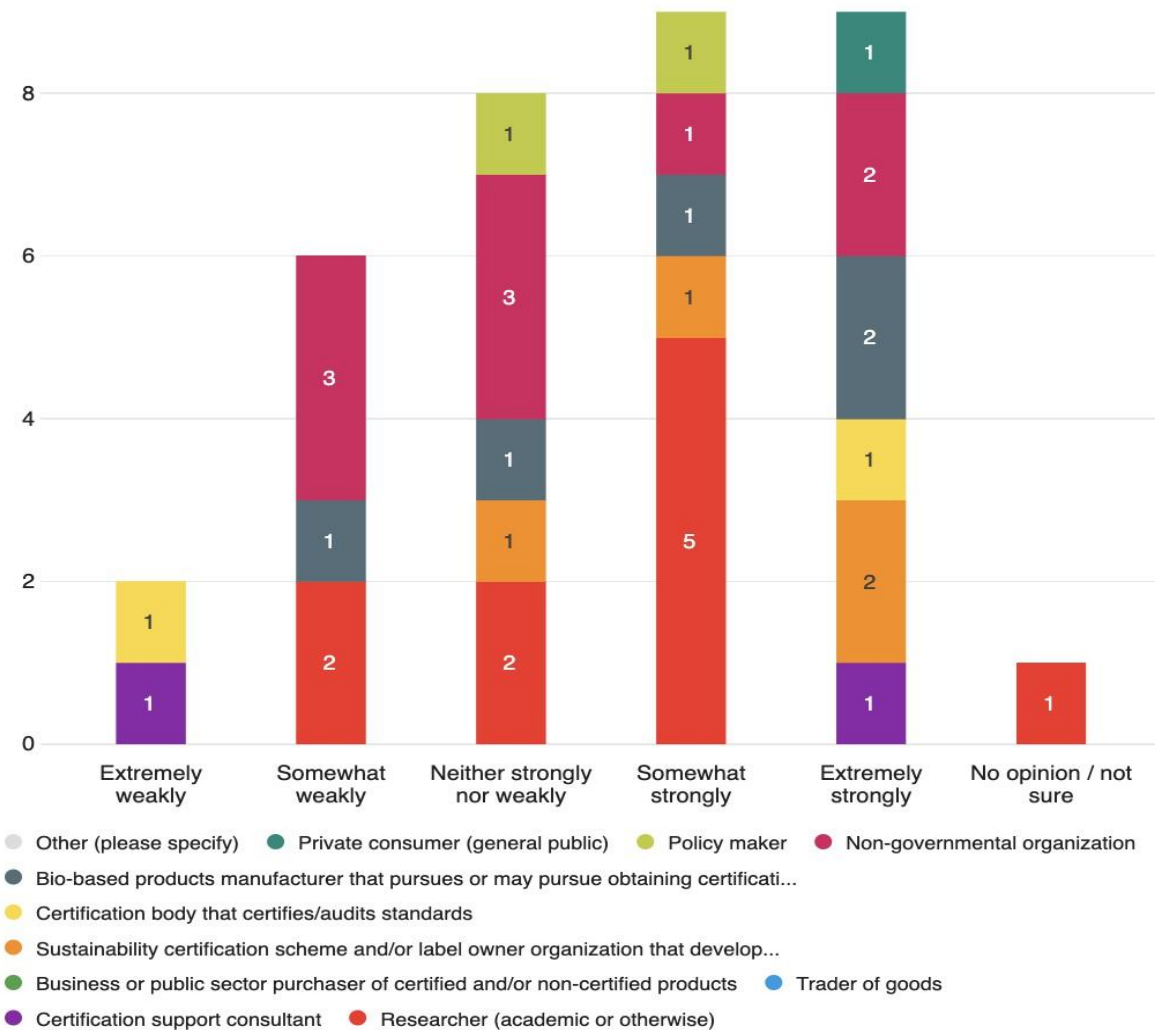


Figure B-3: Stakeholders' thoughts on Measurable Progress of CSLs.

Q12 - 3. COLLABORATION A credible sustainability system identifies governments, businesses, and civil society organisations, including other sustainability systems, that are working towards shared sustainability objectives. It actively seeks alignment and respectfully pursues collaboration with others. It establishes partnerships and shares learnings to improve its efficiency and its direct or systemic impacts. With [QID19-ChoiceGroup-SelectedChoicesTextEntry] in mind, how strongly do you think [QID19-ChoiceGroup-SelectedChoicesTextEntry] follows the COLLABORATION credibility principle?

35 Responses



Q12 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the COLLABORATION credibility principle?

35 Responses

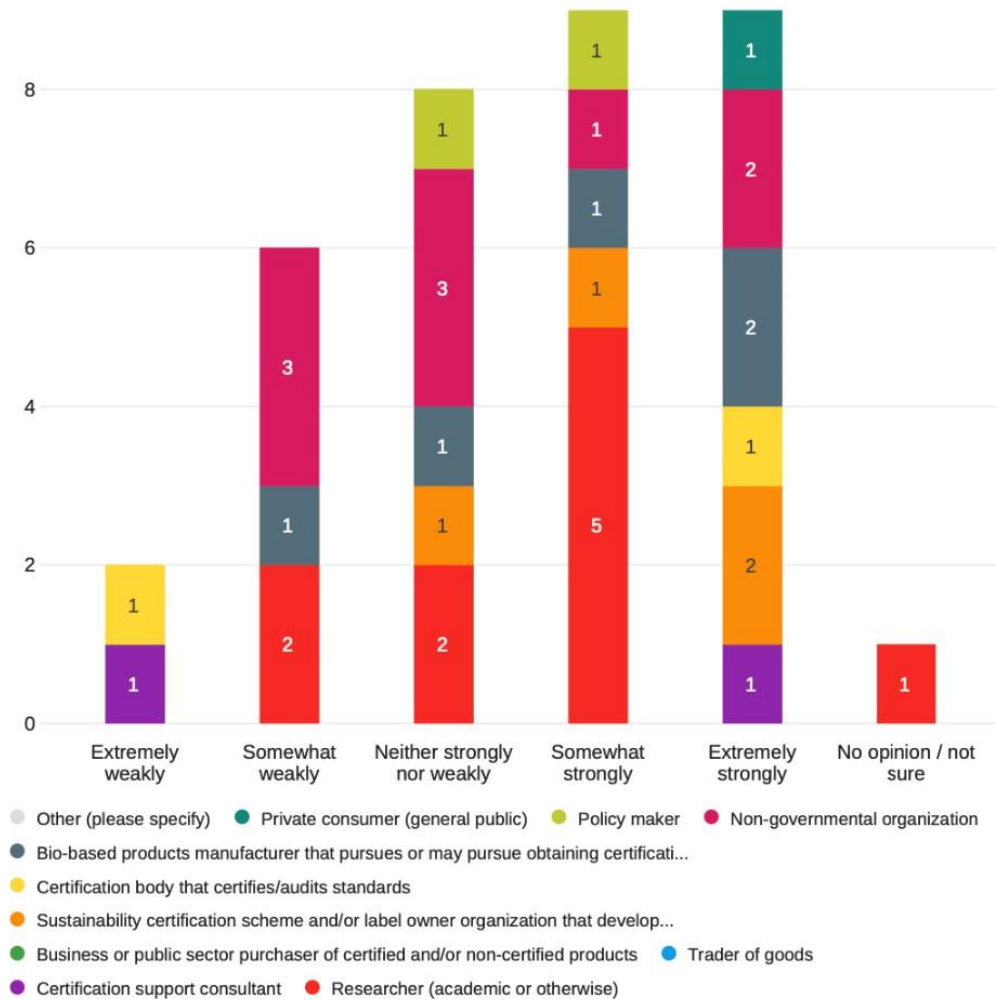
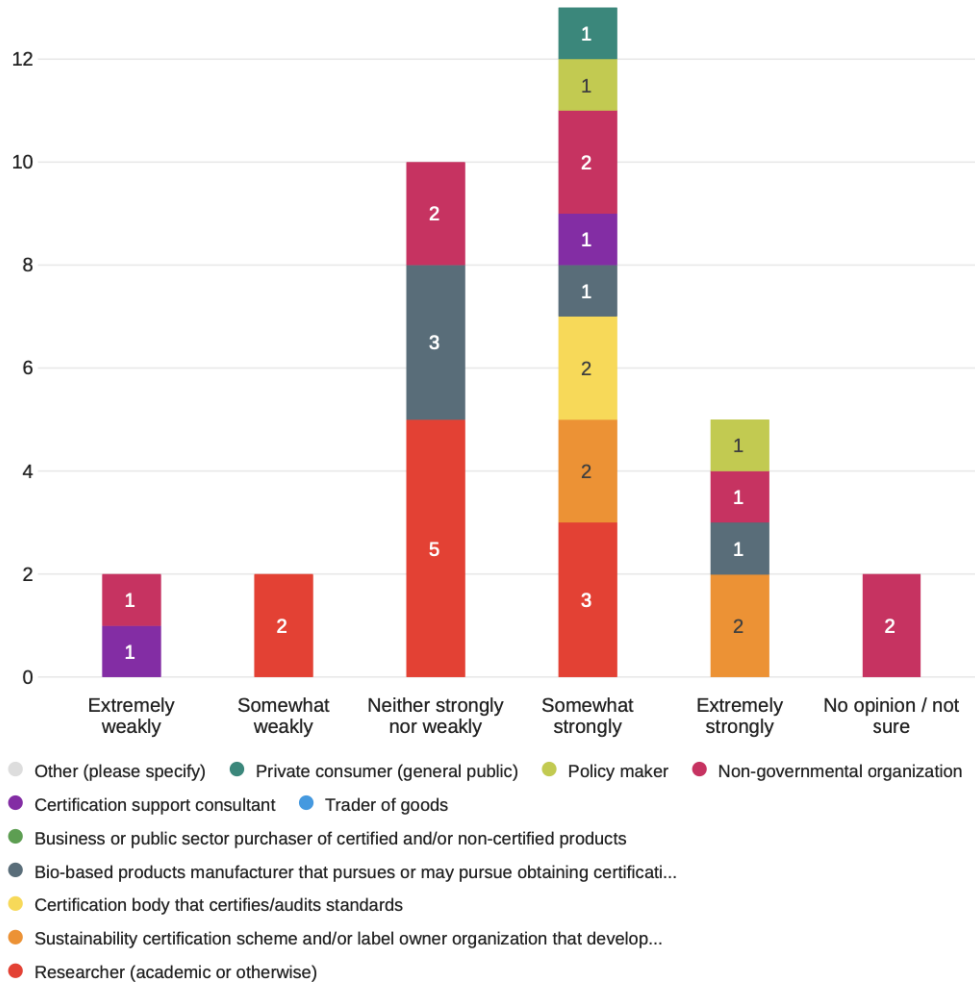


Figure B-4: Stakeholders' thoughts on how CSLs follow the Collaboration principle.

Q14 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the VALUE CREATION credibility principle?

34 Responses



Q14 - 4. VALUE CREATION A credible sustainability system strives to create value that fairly rewards the effort and resources that it takes for users to participate in the system. It has a viable business model, and it operates efficiently, minimising costs for users and reaching more users by reducing other barriers to access. It supports users to implement its tools, and it empowers users by demonstrating a clear business case for participating in its system. With [QID19-ChoiceGroup-SelectedChoicesTextEntry] in mind, how strongly do you think [QID19-ChoiceGroup-SelectedChoicesTextEntry] follows the VALUE CREATION credibility principle?  
34 Responses

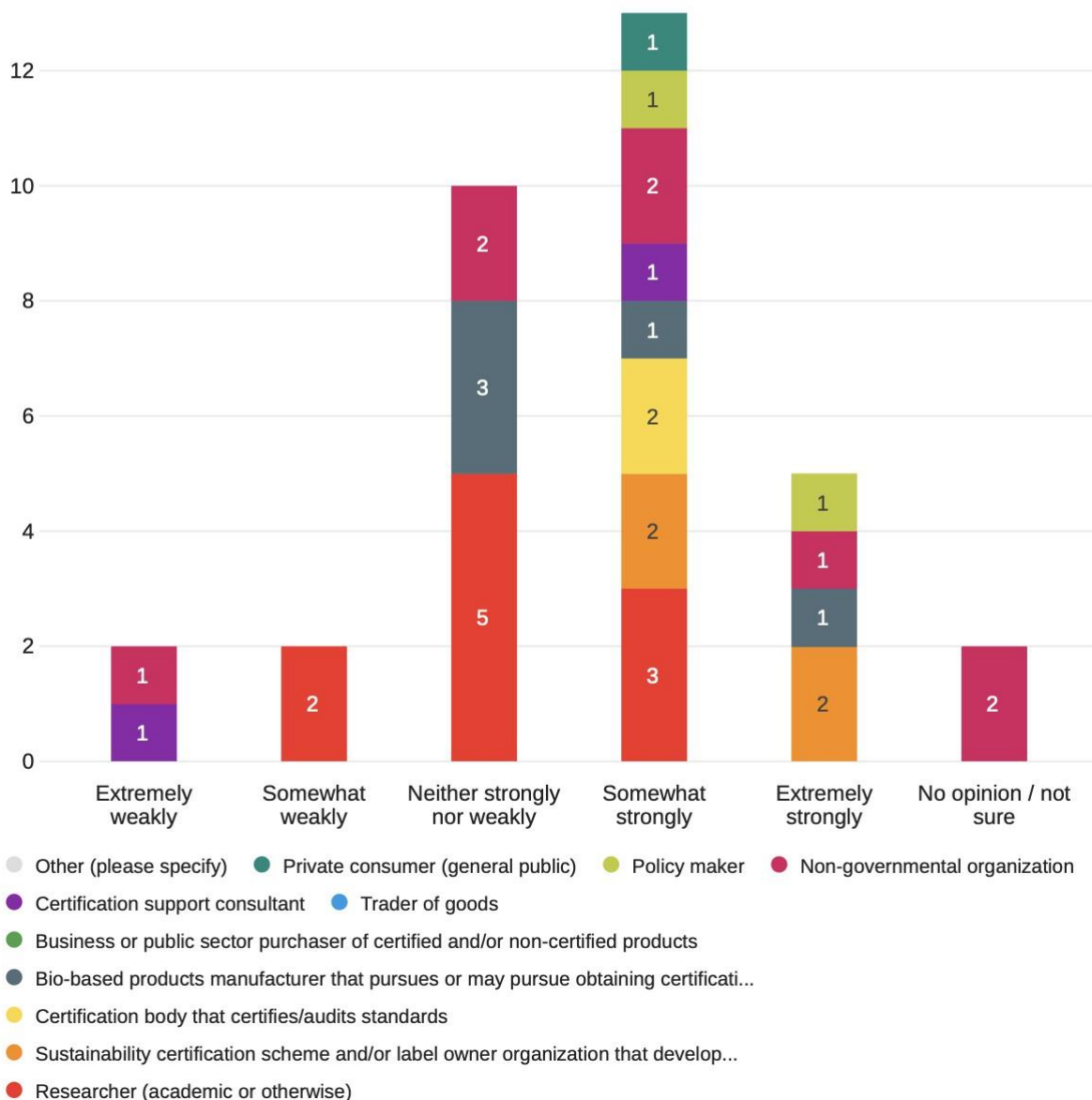
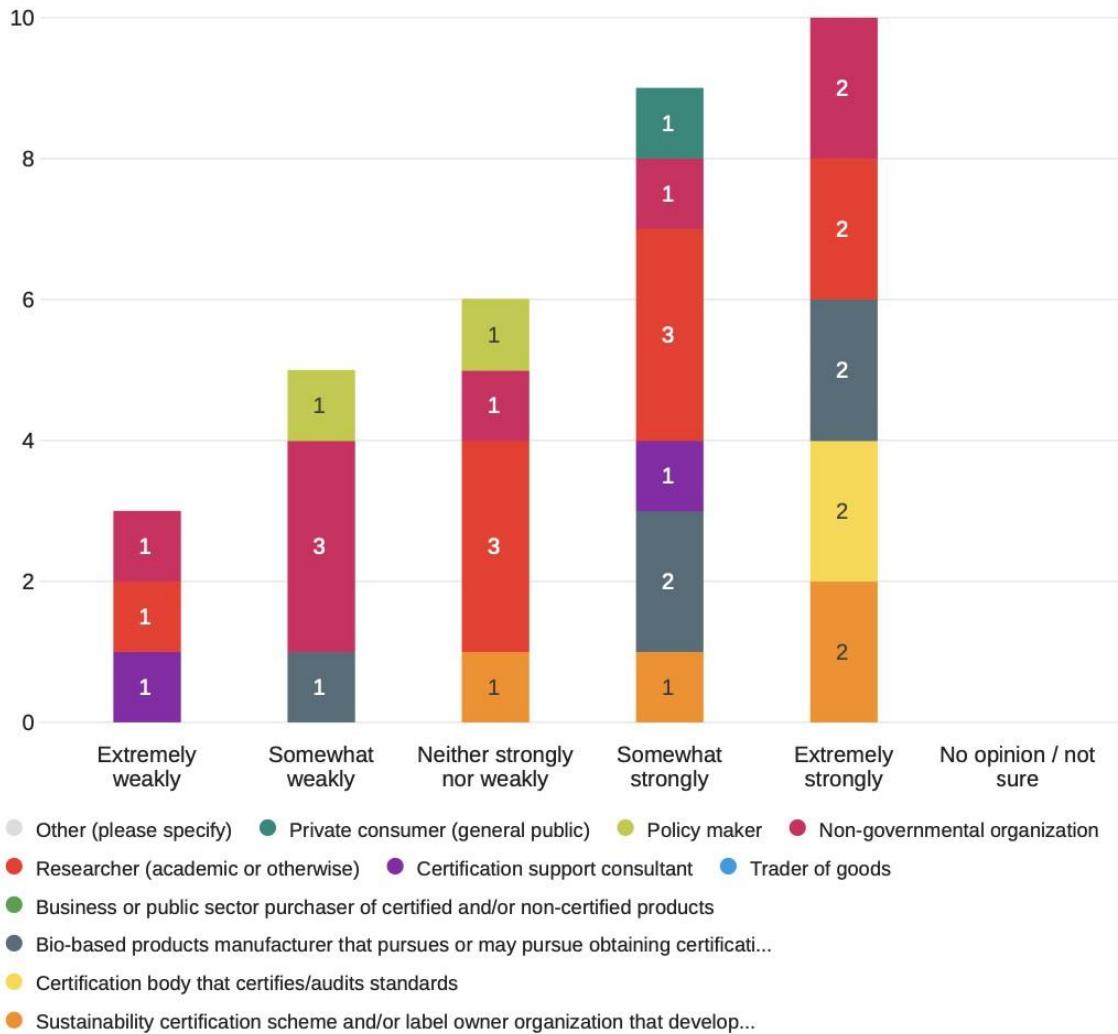


Figure B-5: Stakeholders' thoughts on how CSLs follow the Value Creation principle.

Q18 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the STAKEHOLDER ENGAGEMENT credibility principle?

33 Responses





Q18 - 5. STAKEHOLDER ENGAGEMENT A credible sustainability system is inclusive and non-discriminatory. It empowers stakeholders to participate in decisions and hold the system to account. It involves a balanced and diverse group of stakeholders in decisions that will affect them. It strives to understand the context and perspectives of stakeholders who have been under-engaged or under-represented, and it creates opportunities to ensure their participation in decision-making. It provides clear and transparent feedback on stakeholder input and concerns. It has fair, impartial and accessible mechanisms for resolving complaints and conflicts. With [QID19-ChoiceGroup-SelectedChoicesTextEntry] in mind, how strongly do you think [QID19-ChoiceGroup-SelectedChoicesTextEntry] follows the STAKEHOLDER ENGAGEMENT credibility principle?

33 Responses

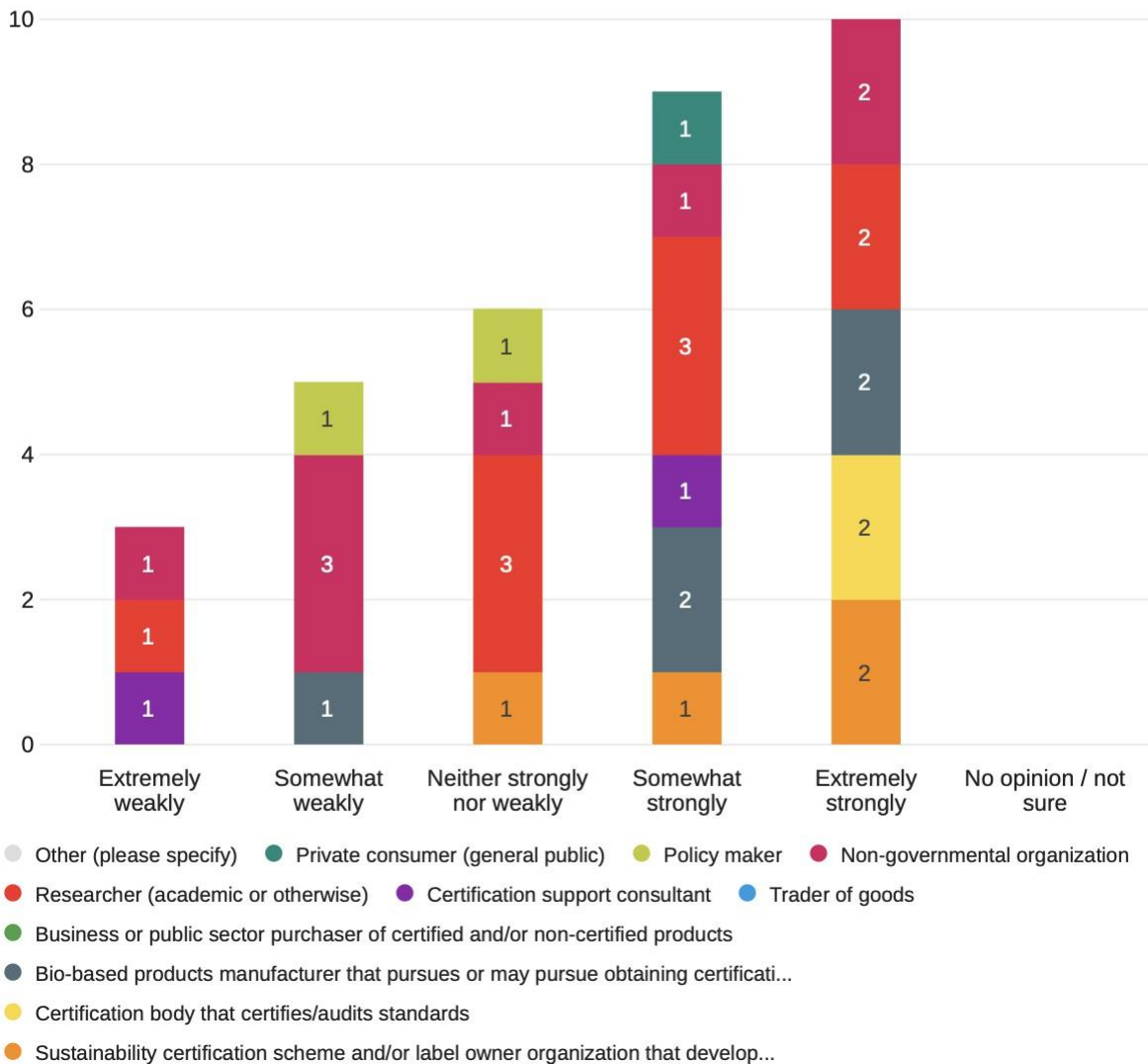
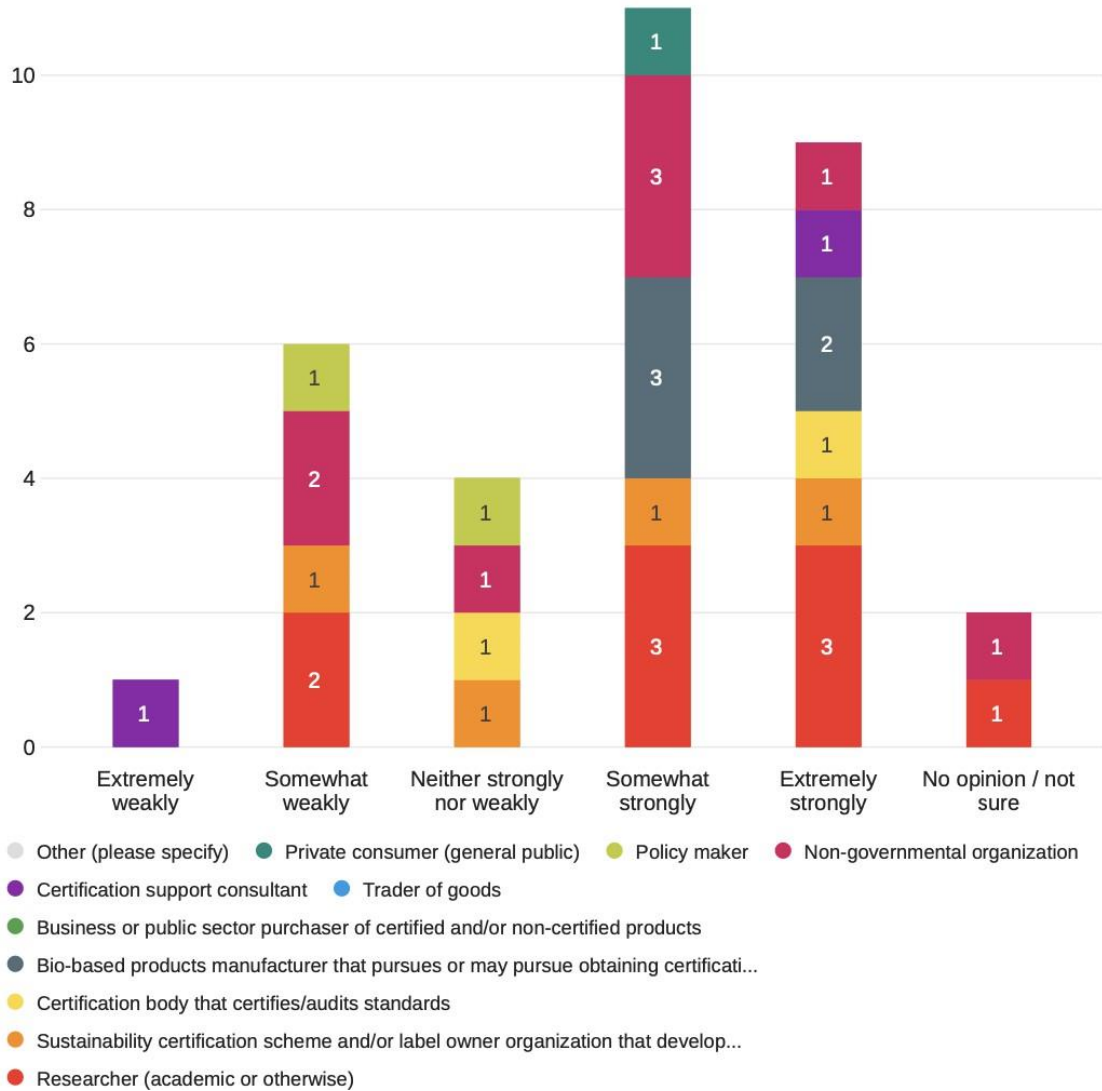


Figure B-6: Stakeholders' thoughts on how CSLs follow the Stakeholder Engagement principle.

Q20 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the TRANSPARENCY credibility principle?

33 Responses



6

Figure B-7: Stakeholders' thoughts on how CSLs follow the Transparency principle.



Q22 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the IMPARTIALITY credibility principle?

33 Responses

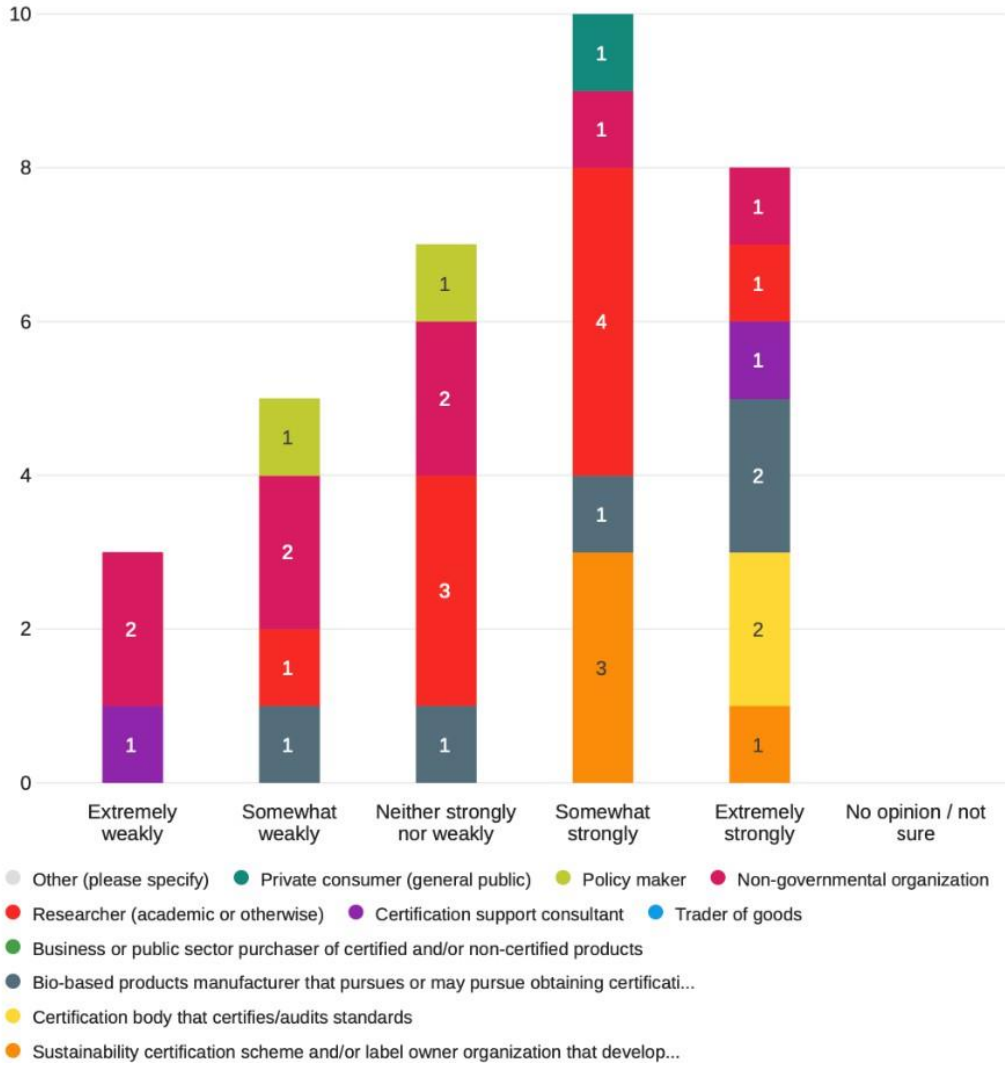


Figure B-8: Stakeholders' thoughts on how CSLs follow the Impartiality principle.



Q24 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the RELIABILITY credibility principle?

33 Responses

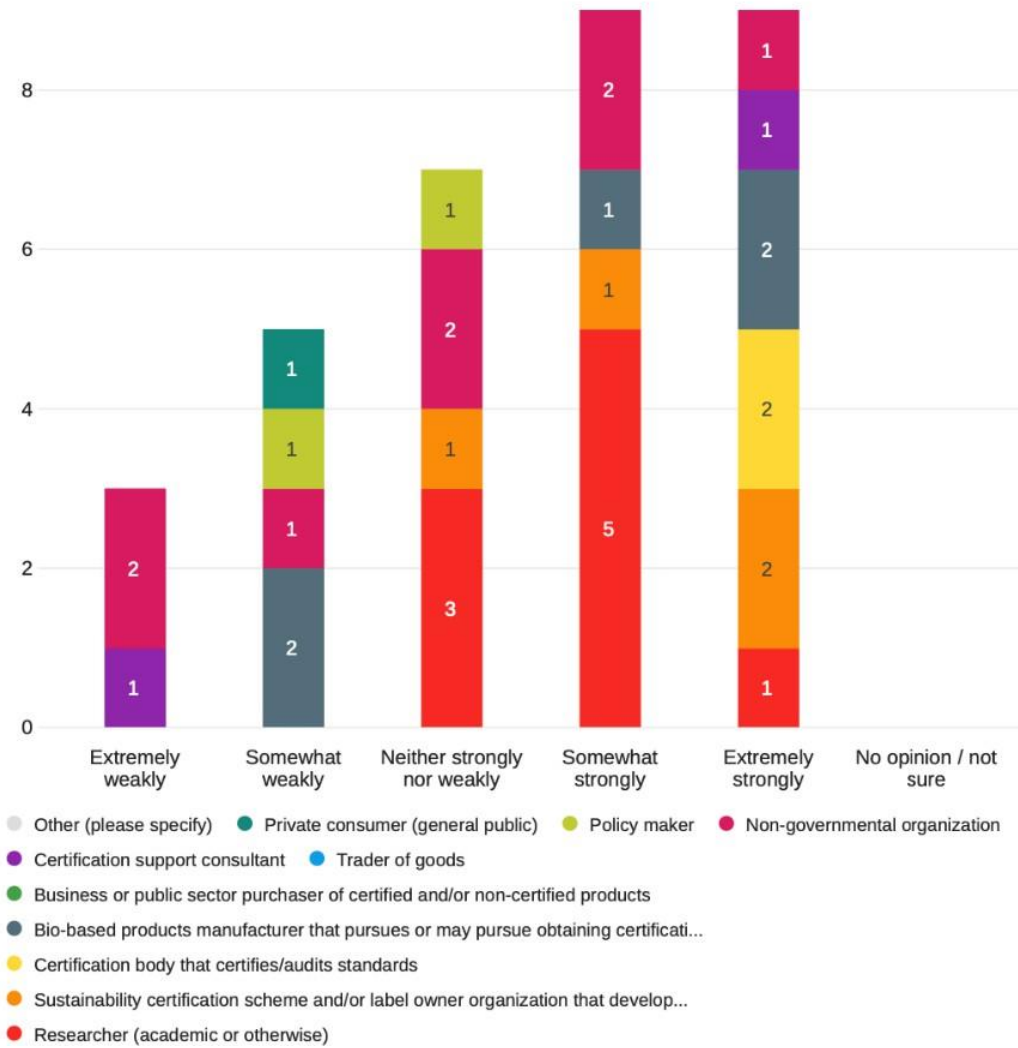


Figure B-9: Stakeholders' thoughts on how CSLs follow the Reliability principle.

Q26 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the TRUTHFULNESS credibility principle?

33 Responses

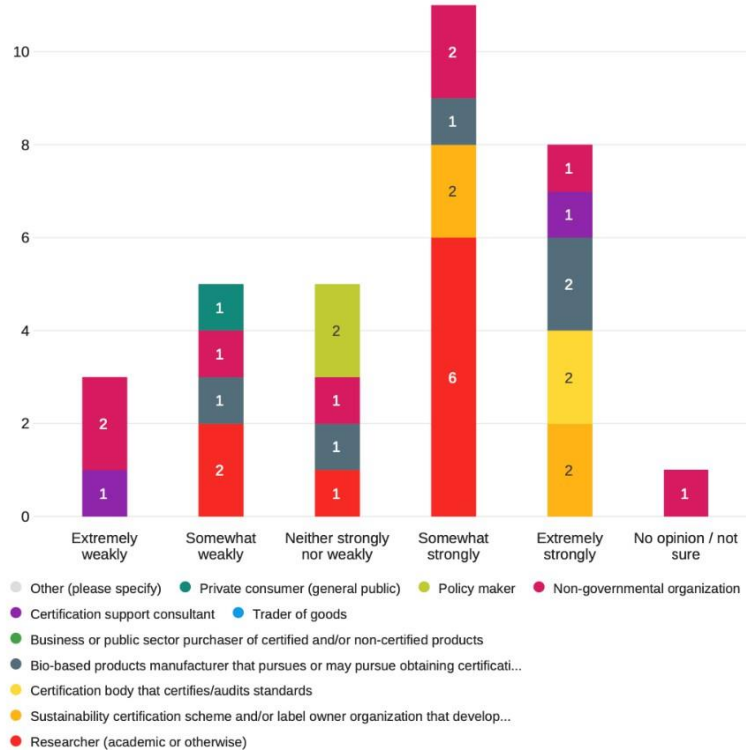


Figure B-10: Stakeholders' thoughts on how CSLs follow the Truthfulness principle.

Q28 - With the specific or general CSLs you have selected in mind, how strongly do you think the specific or general CSLs you have selected follows the CONTINUAL IMPROVEMENT credibility principle?

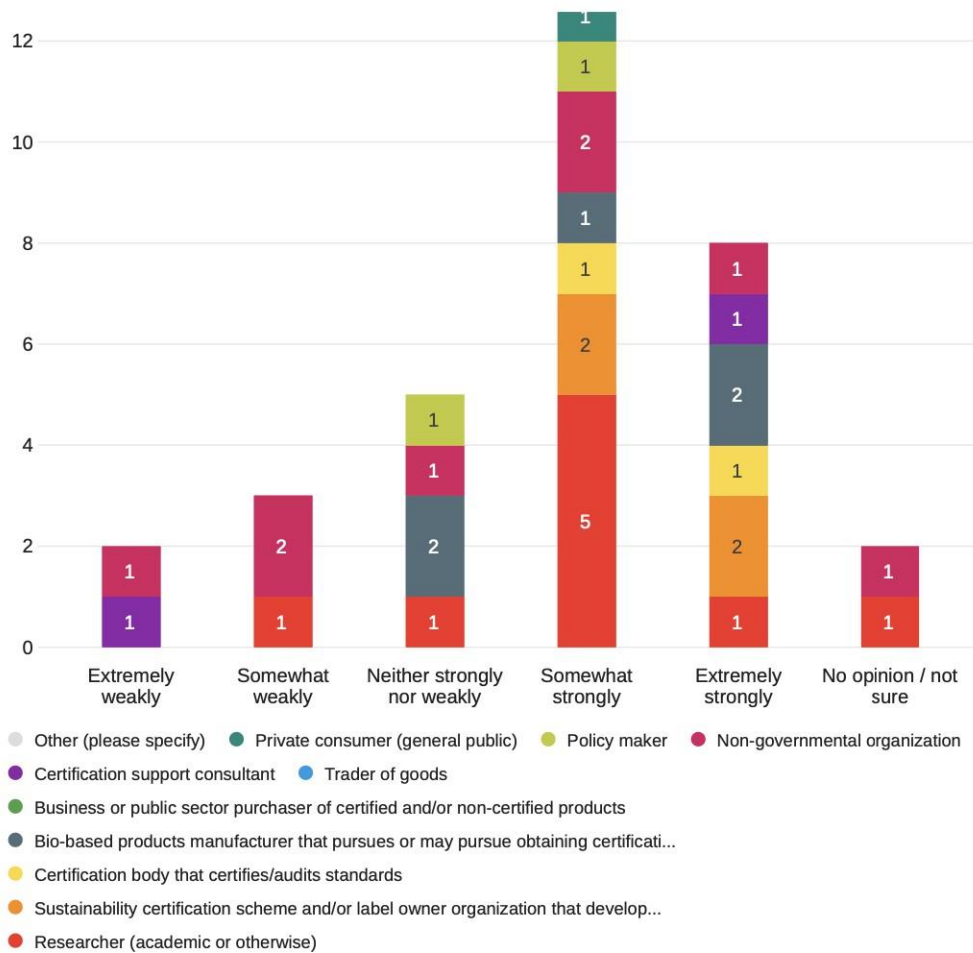


Figure B-11: Stakeholders' thoughts on how CSLs follow the Continual Improvement principle.

Appendix C. Variance analysis

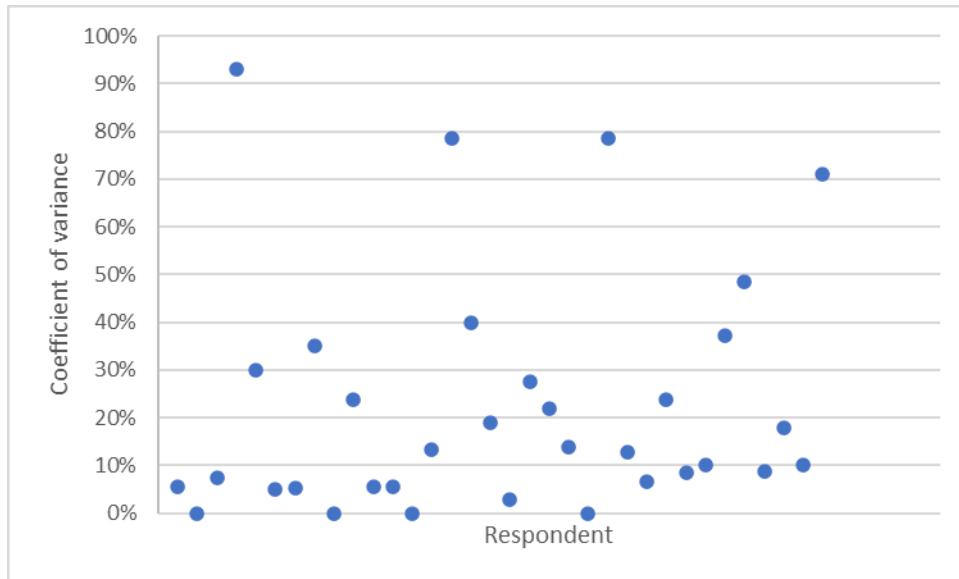


Figure C-1: The variability of answers submitted by the stakeholders for the third part of the questionnaire, indicated as coefficient of variation. Higher values indicate stakeholder answers' are more spread out; lower values indicate less variability.

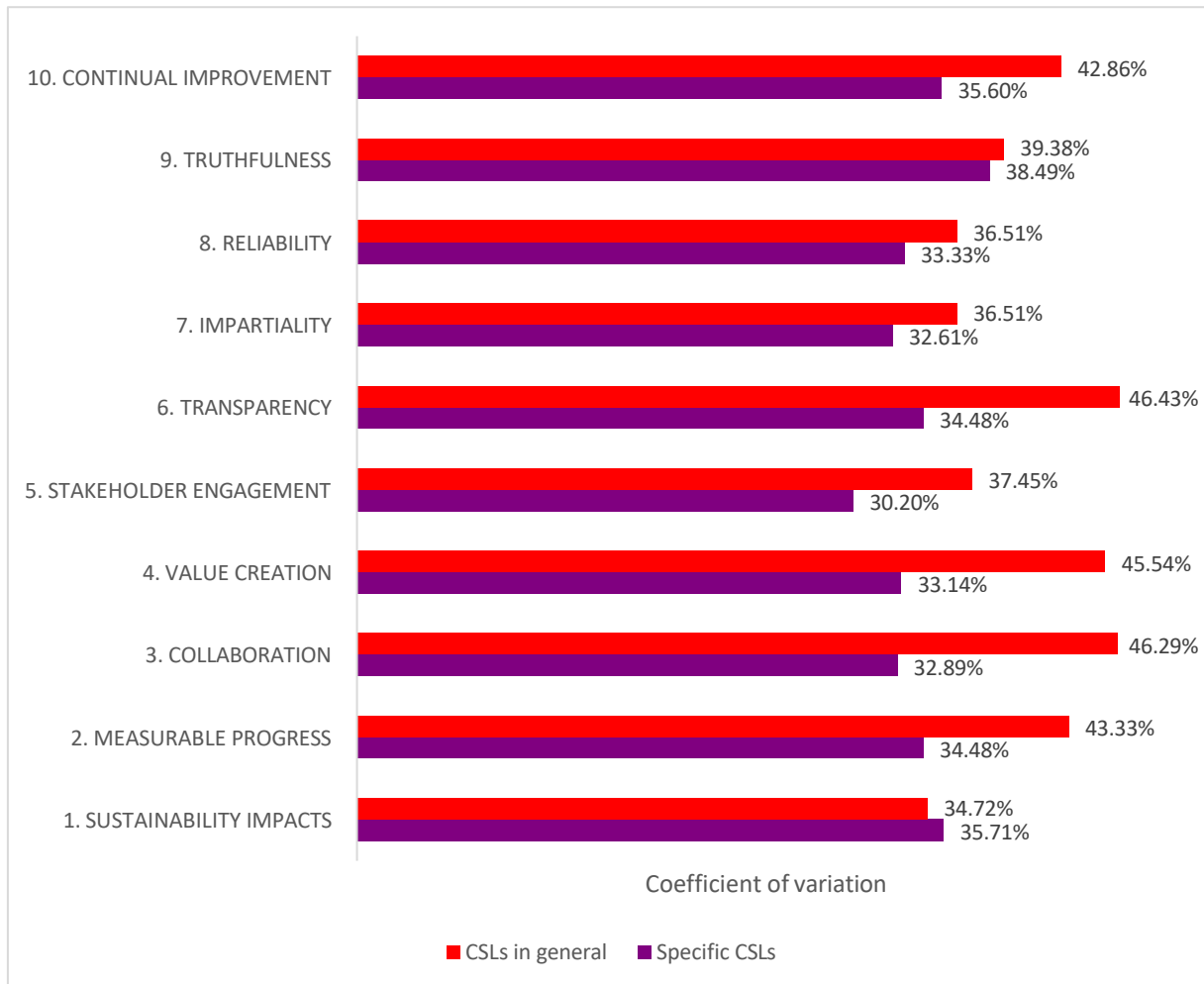


Figure C-2: Variability of answers for each ISEAL credibility principle, indicated as coefficient of variation. Higher values indicate answers within a category are more varied.

Appendix D. Updated results following in-depth interviews.

The results are shown in the form of a Power Point presentation.





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## **Task 2.1 Public Consultation Update**

General Assembly | Utrecht | 8 November  
2023

Maulidia Khairani, Li Shen,  
Martin Junginger | UU

[www.harmonitor.eu](http://www.harmonitor.eu)



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# Agenda

- Update on activities
- Update on follow-up interviews



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# Activity update



- **Status: done**  
115 stakeholders started,  
58 stakeholders completed the survey
- **Aim:** To collect stakeholders' opinion on the advantages, limitations, the role of CSLs in the EU Bioeconomy, and the performance of CSLs

Follow-up interviews

- **Status: done**  
6 stakeholders
- **Aim:** To explore and gain further understanding of the concerns raised by stakeholders in the online survey

Publish article

**Status: draft in progress**

We are here



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# Topics included in the online survey

**Aim:** To collect stakeholders' opinion on the advantages, limitations, the role of CSLs in the EU Bioeconomy, and the credibility performance of CSLs

## CSLs as a co-regulation

Stakeholders background

Stakeholder familiarity with the EU Directives

Advantages of CSLs

Limitations of CSLs

Role of CSLs in the EU Bioeconomy

## CSLs performance

Sustainability Impacts

Transparency

Collaboration

Impartiality

Value creation

Reliability

Measurable progress

Continual improvement

Stakeholder engagement

Truthfulness



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# Topics explored in the follow-up interviews

**Aim:** to explore and gain further understanding of the concerns raised by stakeholders in the online survey.

CSLs as a co-regulation
Stakeholders background
Stakeholder familiarity with the EU Directives
Advantages of CSLs
Limitations of CSLs
Role of CSLs in the EU Bioeconomy

CSLs credibility performance	
Sustainability Impacts	Transparency
Collaboration	Impartiality
Value creation	Reliability → <b>WP6</b>
Measurable progress	Continual improvement → <b>WP5</b>
Stakeholder engagement	Truthfulness



# Interview method and questions

- **Method:** Semi-structured interviews,
- Duration & place: Approximately 1 hour via MS Teams
- Questions asked:
  - Whether the interviewees agreed with the result of online survey regarding the selected topics
  - Stakeholders' views and experiences on the sustainability impacts, the progress measurement of CSLs, as well as rewards and barriers in the implementation of CSLs

Topic	Examples of questions asked during the interview
Sustainability impact	Based on your experience, can you tell me how <i>[the CSLs they have in mind]</i> impact the environmental, social, and economic aspects? Do you notice significant progress?
Measurable progress	Do you think <i>[CSLs they have in mind]</i> have a sufficient monitoring system in place to measure progress over time?
Value creation	Based on your experience, do you think the companies that get certified receive fair rewards for their efforts to participate in the system? Why / why not? Can you give me examples?
Limitations of CSLs	Our preliminary survey result shows proliferation of CSLs, weak system, too much focus on the industry and not on impact as limitations of CSLs. Do you agree with that?
Role of CSLs in the EU Bioeconomy	Given your experiences and thoughts, do you think the EU should regulate them and make them mandatory for the industry?



# Interviewees background

## Interviewees background

- CSL owner (1)
- Certification support consultant (2)
- NGO (1)
- Bio-based purchaser (1)
- Trader (1)

## Geographical location

- Netherlands (3)
- Belgium (1)
- Switzerland (1)
- Argentina (1)

## CSLs mentioned

- ISCC
- SBP
- Rainforest Alliance
- RSPO
- OEKO-TEX



# Overview of the interview result

## Stakeholder views

- In general, the stakeholders agreed and recognised the concerns that were shared in the online survey.

## Harmonisation of CSLs to address common challenges

- The interviews highlight the need for harmonisation to address common challenges faced by stakeholders, such as certification fatigue and inconsistent terminology used across schemes and regulations.
  - The latter concern especially affects purchasers as it limits them from sourcing a product from certain regions.
- Harmonisation of CSLs offers co-benefits for stakeholders, such as:
  - Streamlined definitions used across CSLs and regulations,
  - Enabling cross-acceptance between schemes, therefore, reduces certification fatigue amongst entities that seek to get certified. However, the cross-acceptance needs to be treated carefully to avoid greenwashing.



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# Insights into sustainability impacts, measurable progress, and value creation

## Sustainability impacts

- Mixed responses (pre-condition, sustainability aspects)
- Impacts are considered “not good enough”

*The impact of CSLs (Certified Sustainable Labels) varies depending on the pre-condition, which is influenced by the region and size of entities. The interviewees pointed out that entities that are already advanced in their practices and are later included in the certification tend to show minimal to no impact. Moreover, CSLs usually focus on specific subjects, which means that they do not tackle sustainability issues of the entire production system. Nonetheless, CSLs have contributed positively to some aspects, such as the health and safety of producers. This has led to one interviewee expressing concern about calling CSLs “sustainability” CSLs, to avoid them being perceived as a solution to all sustainability problems.*

## Measurable progress

- Projects use their own monitoring and evaluation framework with their own KPIs
- Impacts are difficult to measure
- A robust Monitoring & Evaluation requires intensive resource

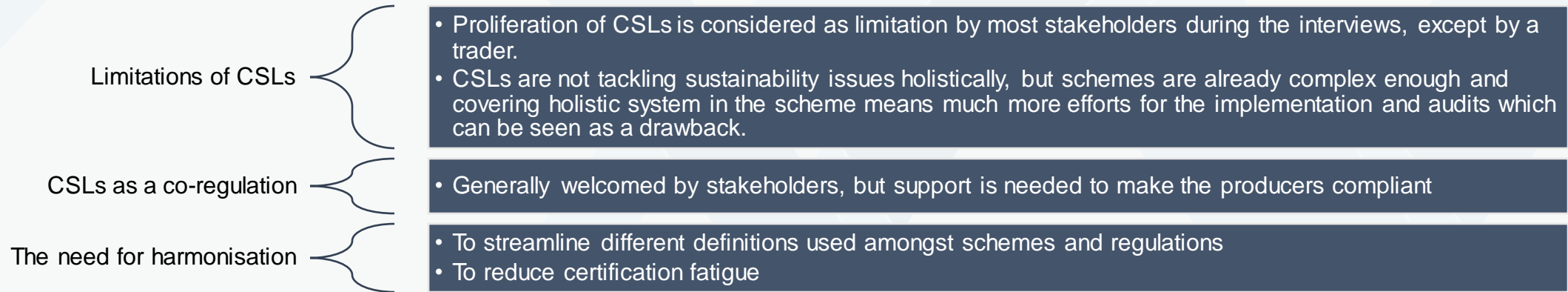
*Stakeholders typically evaluate the output and outcomes of the CSLs using their own monitoring and evaluation framework and KPIs, in order to report on their program. Stakeholders were not aware of the CSLs’ monitoring and evaluation framework to measure the impacts of their certifications on the certified entities. They also pointed out that measuring impacts is challenging and requires intensive resources.*

## Value creation

- Dependent on the pre-condition
- Producers do not always receive higher economic benefits

*Similar to the points raised in the sustainability impacts topic, advantages and barriers to access certification are dependent on the pre-condition, size of entities, and region. Stakeholders pointed out that producers in Latin America and bigger-sized entities typically have more advanced structure in organization and data management, therefore they experience low to none barriers to access certification. Smallholder producers experience high financial barriers and usually get certified through the help of parties such as NGO. Additionally, stakeholders mentioned that economic benefits do not translate to higher income, as it may be used to improve healthcare systems etc. Economic benefits may be limited because of the currency fluctuation and by the price cap of a commodity that is set by local government.*

# Stakeholder views on the limitations of CSLs and the role of CSLs in the EU Bioeconomy



*Certification fatigue occurs when organizations pursue multiple certifications, leading to redundant audit processes that consume significant time and resources.*

# Thank you for your interest in the **HARMONITOR** project

To contact us please reach us via:

Project coordination  
Sergio Ugarte  
[s.ugarte@sqconsult.com](mailto:s.ugarte@sqconsult.com)

[www.harmonitor.eu](http://www.harmonitor.eu)



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