

Dear ISCC Secretariat,

We, the undersigned members of a consortium of organizations advancing Carbon Capture and Utilization (CCU), respectfully submit this letter to advocate for an essential enhancement to the ISCC PLUS framework: the explicit recognition of circular content in CCU-derived products.

CCU technologies convert captured carbon into valuable fuels, chemicals, and materials—enabling carbon circularity, reducing fossil dependency, and supporting climate neutrality goals. To ensure equitable treatment among circular pathways, CCU content should be formally recognized as circular under ISCC PLUS.

Historically, captured CO₂ has not been automatically acknowledged as circular due to its lack of intrinsic energy value and the need to demonstrate net climate benefits. While once justifiable, this caution is no longer consistent with the evolving scientific consensus.

The Global CO₂ Initiative's May 2025 report, *Catalyzing Carbon Innovation*, found that CCU content is not recognized as circular in a consistent way with other pathways, such as recycling—representing a significant barrier to growth. The report emerged from a high-level dialogue convened at the University of Michigan that brought together CCU companies, policy experts, investors, and manufacturing leaders to identify key barriers and deployment pathways for CCU-based manufacturing. In its 6th assessment report (Working Group 3, Mitigation of Climate Change, 2022), the IPCC indicates that *“there is growing interest in “circular bioeconomy” concepts applied to bio-based materials and even a “circular carbon economy”, wherein carbon captured via CCU or CDR is converted into reusable materials, which is especially relevant for the transitions of economies dependent on fossil fuel revenue”*.

Those elements call for performance-based certification systems that treat CCU content on par with other forms of circularity and notes that the absence of recognition within ISCC PLUS presents a specific impediment to market uptake.

This gap is evident in the current ISCC CFC methodology, which helps quantify climate benefits but does not enable credible circularity claims under ISCC PLUS. As a result, CCU-based materials face limitations in market viability, as their sustainability attributes cannot be verified downstream using familiar certification mechanisms.

We respectfully urge ISCC PLUS to:

1. Recognize Circular Content from Captured CO₂

Incorporate captured carbon into ISCC PLUS methodology when product carbon footprint improvements are demonstrable—whether via ISCC CFC or other verified standards.

2. Enable Automatic Recognition via RFNBO-Compliant Pathways

Automatically recognize captured CO₂ as circular content when used in electrified CCU processes that comply with Renewable Fuels of Non-Biological Origin

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(RFNBO) requirements. These pathways are already subject to rigorous greenhouse gas reduction criteria and align well with circular product definitions.

We believe this evolution in ISCC PLUS will enhance transparency, enable innovation, and ensure consistent treatment of circularity claims across emerging carbon supply chains. We would welcome the opportunity to contribute technically to this evolution and are prepared to engage in dialogue or technical working groups to support this important work.

Sincerely,

