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Fossil Free Products - Guidelines and Requirements for Fossil Fuel Free Supply Chains

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The formal process followed by the Workshop in the development of this Workshop Agreement has been endorsed by the National Members of CEN but neither the National Members of CEN nor the CEN-CENELEC Management Centre can be held accountable for the technical content of this CEN Workshop Agreement or possible conflicts with standards or legislation.

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Foreword

This CEN Workshop Agreement (CWA 18203:2025) has been developed in accordance with the CEN-CENELEC Guide 29 “CEN/CENELEC Workshop Agreements – A rapid way to standardization” and with the relevant provisions of CEN/CENELEC Internal Regulations - Part 2. It was approved by the Workshop CEN “Fossil Free Products - Guidelines and Requirements for Fossil Free Supply Chains, the secretariat of which is held by “UNI” consisting of representatives of interested parties on 2025-03-24, the constitution of which was supported by CEN following the public call for participation made on 2024-07-09. However, this CEN Workshop Agreement does not necessarily include all relevant stakeholders.

The final text of this CEN Workshop Agreement was provided to CEN for publication on 2025-03-27.

The following organizations and individuals developed and approved this CEN Workshop Agreement:

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Although the Workshop parties have made every effort to ensure the reliability and accuracy of technical and non-technical descriptions, the Workshop is not able to guarantee, explicitly or implicitly, the correctness of this document. Anyone who applies this CEN Workshop Agreement shall be aware

that neither the Workshop, nor CEN, can be held liable for damages or losses of any kind whatsoever. The use of this CEN Workshop Agreement does not relieve users of their responsibility for their own actions, and they apply this document at their own risk. The CEN Workshop Agreement should not be construed as legal advice authoritatively endorsed by CEN/CENELEC.

Introduction

The climate crisis remains one of the most urgent challenges facing humanity today. The World Meteorological Organization (WMO) reports an 80 % likelihood that the annual average global temperature will temporarily exceed 1,5°C above pre-industrial levels for at least one year before 2028. This stark warning highlights how close we are to the critical thresholds identified by the Paris Agreement on climate change ([World Meteorological Organization](#)). Without immediate and significant reductions in fossil fuel use, the world is on track to experience catastrophic consequences for ecosystems and human societies.

Human activities, particularly those related to fossil fuel consumption, are the primary drivers of climate change and environmental degradation. Major industrial supply chains account for a significant amount of annual global greenhouse gas (GHG) emissions by burning fossil fuels. This highlights the critical need for greater transparency regarding fossil fuel use and opportunities for reduction within supply chains to mitigate environmental impact.

This document offers clear criteria for tracking fossil fuel use in supply chains, enabling consumers to make informed choices and motivating manufacturers to transition to fossil free operations, and building consumer trust. It is designed as a tool for assessing fossil fuel dependency and identifying possibilities and opportunities for reduction rather than as a comprehensive solution for all sustainability challenges.

The guidelines emphasise the utilisation of renewable energy sources - such as solar, wind, hydro, and geothermal - across all supply chain stages. Additionally, the guidelines prohibit practices like offsetting, ensuring full accountability and transparency in fossil free claims.

While this CWA complements other ways to address climate change, such as those focusing on the circular economy, carbon capture, utilisation and storage, carbon offsetting, geoengineering and end-of-life considerations, it is not intended to cover these broader topics. Its primary focus is on upstream processes, including material extraction, manufacturing, and transport, up to the final product delivery. It does not evaluate the use phase or end-of-life impacts of products, which remain outside the scope of this document.

Additionally, this document does not seek to regulate or assess all GHGs, it is specifically limited to fossil fuels and fossil-based materials.

In conclusion, the "Fossil Free Products: Guidelines and Requirements for Fossil Free Supply Chains" serves as a transparency tool to help businesses assess and disclose their fossil fuel use, identify reduction opportunities, and support supply chain decarbonization. This CWA does not present itself as the singular solution for all sustainability challenges but rather as a focused contribution to addressing fossil fuel dependency in supply chains.

1 Scope

This document provides guidelines and requirements for fully and partially fossil free supply chains for physical, digital and hybrid products and services. The document focuses on transparency of fossil fuel use and fossil-derived materials within supply chains, rather than on individual products.

The intended audience for this document includes:

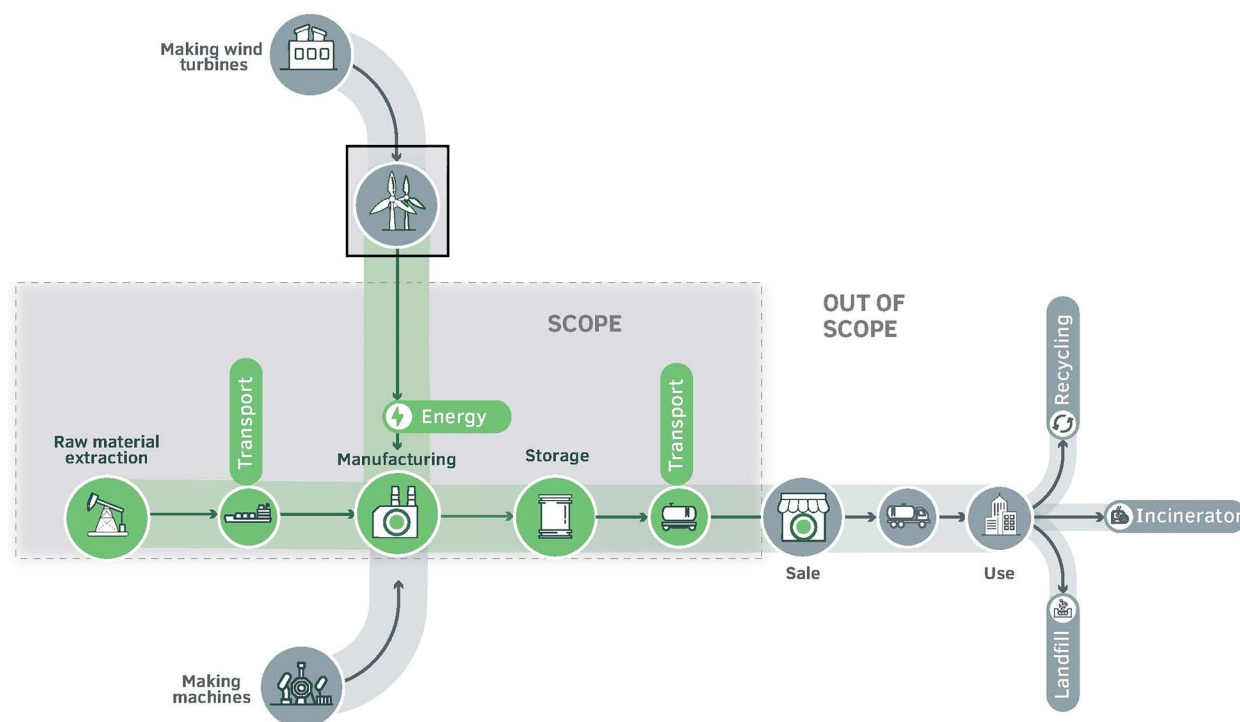
- Manufacturers of physical goods who wish to increase transparency regarding fossil fuel use in their production processes, including energy sources and fossil-derived materials.
- Digital service providers who want to ensure that their infrastructure, including servers and digital services, meets fossil free criteria.
- Suppliers within the supply chain who need to comply with the same fossil free requirements to ensure the certification extends across the entire chain.
- Certification bodies that assess and verify that products and services meet the fossil free requirements outlined in this document.

This document applies across industries working to increase transparency and decarbonize their supply chains, offering clear, specific requirements for identifying and tracking fossil reliance. However, it is important to note that the focus is strictly on upstream processes - material extraction, production, and transport - up to the point of final product delivery.

This document does not evaluate broader sustainability metrics such as recycling, energy efficiency, the use phase of products by consumers, or end-of-life impacts. Additionally, it does not account for all greenhouse gases but is specifically limited to fossil fuels and fossil-based materials.

By focusing on greater transparency and disclosure in fossil fuel use within supply chains, this document serves as a structured framework for tracking and reducing reliance on fossil fuels where possible. It is intended to complement, rather than replace, existing EU regulations and standards, which have priority and are intended to be fulfilled before applying this document.

This document is greenhouse gas (GHG) programme neutral. If a GHG programme is applicable, requirements of that GHG programme are additional to the requirements of this document.



NOTE For the sake of simplicity, the figure is limited to a single production site. In practice, a supply chain will often have several supplier routes.

Figure 1 — Scope of Fossil Free Products: Guidelines and requirements for Fossil Free Supply Chains

Figure 1 visually defines the boundaries of what is included and excluded in the scope of the document. The scope covers raw material extraction, manufacturing processes, transport, storage, and the energy used in these stages. However, it excludes certain pre-stages of production, such as the supply chains of machinery and equipment used to manufacture products, as well as the infrastructure for energy production (e.g., wind turbines, generators). Additionally, product sales, use, recycling, landfill disposal, and incineration are out of scope, as the focus remains on eliminating fossil fuels within the supply chain up to the final product delivery.

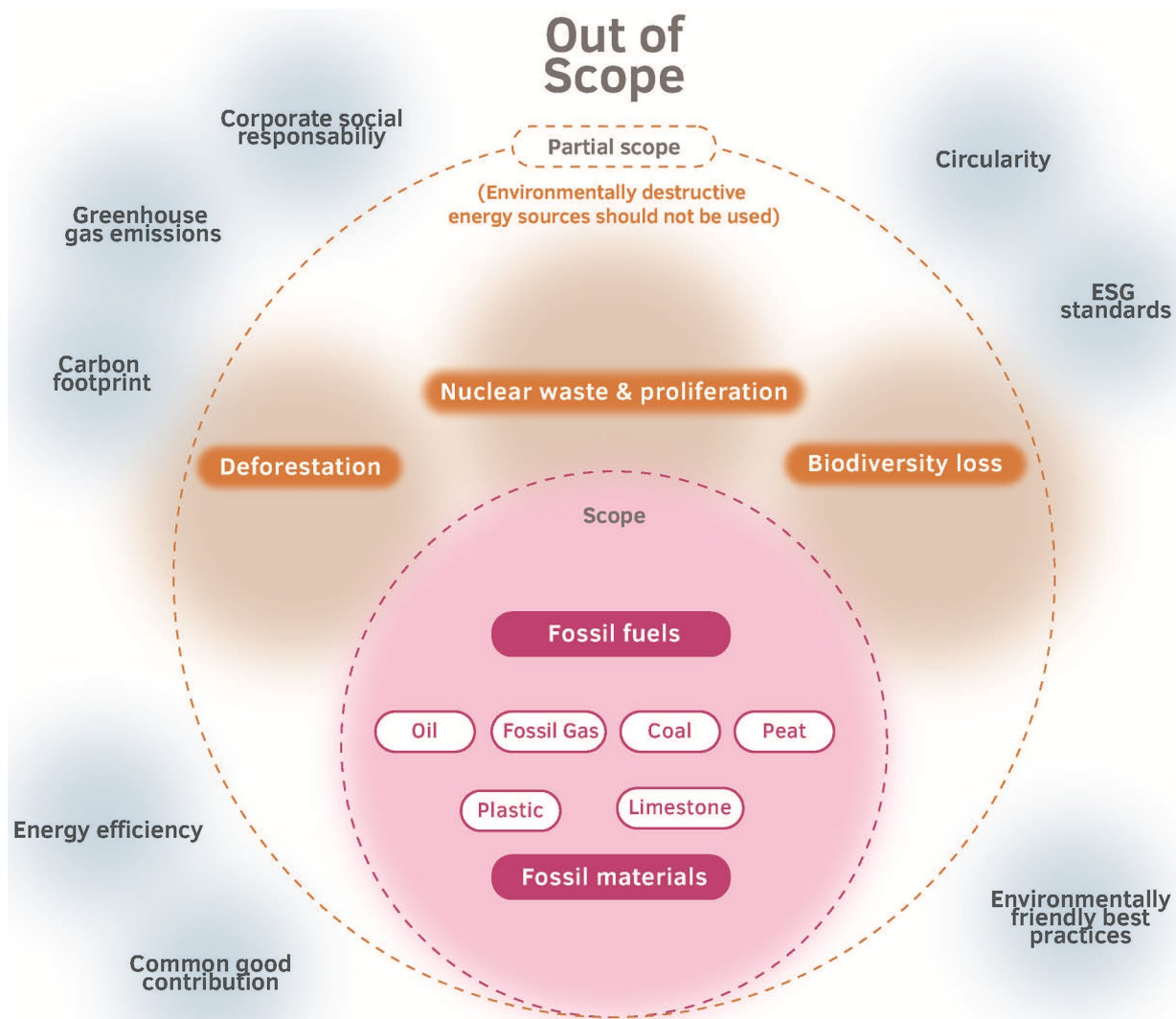


Figure 2 — Scope of Fossil Free Products: Guidelines and requirements for Fossil Free Supply Chains — Fossil Fuels, Fossil Materials and related considerations

Figure 2 clarifies the scope of the Fossil Free Product CWA by distinguishing between in-scope, partially in-scope, and out-of-scope considerations:

- **In Scope:** The CWA directly addresses the elimination of fossil fuels (oil, gas, coal) and fossil materials (including plastics and limestone) from supply chains.
- **Partial Scope:** Some related environmental issues, such as deforestation, biodiversity loss, and nuclear waste and proliferation, are considered in specific cases. The CWA states that nuclear power should not be used and biomass should not be used in installations exceeding 5 MW capacity. While these aspects are relevant, they are not the primary focus of the CWA.
- **Out of Scope:** Broader sustainability aspects, including corporate social responsibility, ESG standards, circularity, and the common good contribution, fall outside the CWA scope. While these topics are important, they are not part of the criteria for defining a fossil free product or supply chain.

2 Normative references

The following documents are referred to in the text in such a way that some or all of their content constitutes requirements of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

EN ISO 14024:2018, *Environmental labels and declarations — Type I environmental labelling — Principles and procedures (ISO 14024:2018)*

EN ISO/IEC 17065:2012, *Conformity assessment — Requirements for bodies certifying products, processes and services (ISO/IEC 17065:2012)*

3 Terms and definitions

For the purposes of this document, the following terms and definitions apply.

ISO and IEC maintain terminological databases for use in standardization at the following addresses:

- ISO Online browsing platform: available at <http://www.iso.org/obp/>
- IEC Electropedia: available at <http://www.electropedia.org/>

3.1

chain of custody

demonstrable possession, movement, handling, and location of material from one point in time until another

Note 1 to entry: Examples include:

- Tracking the journey of certified fossil free timber from the forest to the final consumer product
- Ensuring renewable energy certificates follow the supply of electricity from producer to user

3.2

digital products

software-based solutions that facilitate communication via network requests to a service and receive responses, including:

- Websites
- Mobile Applications (Apps)
- API Services
- Cloud Services

3.3

DNS host

service provider that manages the Domain Name System (DNS) records for a domain name

Note 1 to entry: The DNS host is responsible for translating human-readable domain names (e.g., www.example.com) into the corresponding IP addresses (e.g., 192.0.2.1) that computers use to locate and access resources on the internet.

3.4

Energy Attribute Certificate (EAC)

contractual instrument that conveys information (attributes) about a unit of energy, including the resource used to create the energy and the emissions associated with its production and use

Note 1 to entry: EACs may also include information about the location of the facility that generated the unit of energy, when that facility began operations, and when the unit of energy was produced. EACs are an established tool for maintaining transparency and clarity in energy sector transactions, as well as a mechanism for facilitating credible innovations that can increase the pace and scale of clean energy growth.

3.5

final product delivery

point at which the finished product is transported from the last manufacturing or packaging facility to its initial destination, which could be a distribution centre, retailer, or directly to the customer

Note 1 to entry: This excludes any subsequent transportation between multiple retailers or the final retail sale process.

3.6

fossil free

product, process, or system that operates without the use of fossil fuels (oil, gas, coal, or peat) at any stage of its lifecycle, from raw material extraction to final product delivery

Note 1 to entry: This includes no fossil fuels burned for energy and no fossil-derived materials, including fossil limestone used as primary material for the final product.

3.7

fossil fuel

carbonaceous material derived from geological deposits, including coal, peat, fossil gas and liquid fuels

3.8

fossil materials

oil, fossil gas, coal, peat and limestone, as well as any materials that are derived from these fossil materials, such as oil-based plastics or lubricants, even if they are not burned for energy

3.9

Guarantees of Origin (GOs)

certification that verifies the source of energy, proving that the electricity has been produced from renewable energy sources

Note 1 to entry: GOs are typically used in Europe to trace and label renewable energy in the electricity grid, providing transparency about where the energy comes from.

3.10

lifecycle stages

phases a product goes through from raw material extraction, material processing, manufacturing, packaging and storage up to final product delivery

3.11

carbon offsets

mechanism for compensating for all or for a part of carbon emissions through the prevention of the release of, reduction in, or removal of an amount of greenhouse gas emissions in a process outside the product system

Note 1 to entry: Offsets typically involve projects like reforestation, renewable energy installations, or energy efficiency improvements, aiming to balance out emissions generated by a company or individual.

3.12

Partially Fossil Free

product or process for which at least one clearly identifiable stage in both the material and the supply chain process is free from fossil fuels and respectively fossil materials

3.13

Power Purchase Agreements (PPAs)

power acquisition agreement between a buyer and a seller

3.14

Power-to-X Processes

set of processes that convert electricity into various energy carriers, such as hydrogen (Power-to-Hydrogen), synthetic fuels (Power-to-Fuel), or chemicals (Power-to-Chemicals)

Note 1 to entry: These processes are crucial for storing renewable energy and producing fossil free alternatives for sectors like transport and industry.

3.15

primary raw materials

material which has never been processed into any form of end-use product

3.16

recycled material

material that has been recovered or otherwise diverted from the solid waste stream, either during the manufacturing process or after consumer use

3.17

renewable energy

energy from a renewable resource

Note 1 to entry: Common sources include solar, wind, hydropower, and geothermal.

3.18

second level

second tier of the supply chain in a digital product's infrastructure

Note 1 to entry: Specifically, this means any service provider that is involved in providing the final digital product. In essence, these are subprocessors one step removed from the immediate product but still integral to the product's function. This includes backend systems, API services, or plugins that support the operation of the digital product.

3.19

subprocessors

third-party entities that process data or perform functions on behalf of the primary service provider, including API services, content delivery networks, and visitor analytics tools

3.20

Temporary Components

materials or substances used during the production process that do not remain in the final product, and which are necessary components for production or packaging but are removed or consumed during the process

Note 1 to entry: Examples include:

- Pesticides used on crops
- Cleaning agents used in the preparation of surfaces before painting or coating
- Primary packaging (direct contact with the product) and secondary packaging (external packaging used for shipping)

4 Requirements for fossil free products

Fossil materials shall not be used in products. This includes any materials derived from oil, fossil gas, coal and peat (e.g. oil-based plastics, petrochemical products, etc.) and limestone.

5 Requirements for fossil free processes

5.1 Energy sources

5.1.1 Oil, fossil gas, coal and peat shall not be used. All products and their components, including both permanent and temporary components, shall be produced without burning oil, fossil gas, coal, or peat throughout their supply chain.

5.1.2 Renewable energy sources should be utilised throughout the supply chain.

5.1.3 Offsets shall not be accepted as a substitute for using actual renewable energy.

5.1.4 Renewable energy sources include:

- Solar power (photovoltaic and solar thermal),
- Wind power (onshore and offshore),
- Geothermal energy,
- Ocean energy (tidal, wave, and ocean thermal energy conversion),
- Biomass should not be used in installations exceeding 5 MW capacity.

5.1.5 Hydropower should follow the guidelines of the World Commission on Dams.

5.1.6 Nuclear power should not be used.

5.1.7 Renewable energy used in production shall be either generated on-site or traceable through Energy Attribute Certificates (EACs) such as Guarantees of Origin (GOs) that are procured from the same generation source as the underlying energy. Such procurement should provide a traceable financial flow for both the power and its attributes, such as a Power Purchase Agreement (PPA). PPAs allow companies to directly purchase renewable energy from a generator and may incentivize long-term investments in renewable energy infrastructure. Certificates should follow the “three pillars” principles adopted in both the European Union and the United States for renewable and “clean” hydrogen projects. These principles include:

- Timeliness – Electricity generation shall be matched to the same hour as consumption to ensure real-time correlation.

- **Additionality** – Renewable energy procurement shall come from new, additional sources rather than reallocating existing generation that is already displacing fossil fuels.
- **Deliverability** – Certificates shall be used within the same grid where the renewable energy is generated to prevent mismatches in supply and consumption.

5.1.8 It is also acceptable if the renewable electricity is sourced from a 100 % renewable national grid, meaning that the grid produces enough renewable electricity to meet or exceed its domestic demand over the course of a year. While fossil fuels may still be used for power generation at times, the grid shall achieve at least 100 % renewable energy production on an annual basis. For grids that meet this criterion, additional certifications are not required. Even in grids that meet this criterion, if an Energy Attribute Certificate (EAC) system is in place, all renewable energy procurement shall be supported by the purchase and cancellation of EACs, in accordance with point 5.1.7 above. This requirement prevents the double counting of renewable energy attributes. The requirement for EACs as proof of renewable energy procurement is waived only in energy markets where no EAC scheme exists.

5.1.9 Hydrogen and fuel derivatives shall be produced using renewable electricity (meeting the above criteria). Renewable fuels generated through Power-to-X processes (e.g. Power-to-Hydrogen, Power-to-Fuel, Power-to-Chemicals) are permitted, as long as the conversion processes are powered by renewable electricity, and the resulting fuels meet fossil free criteria.

5.1.10 Where batteries are used, they shall be charged using renewable energy in line with the requirements outlined in this section.

5.1.11 Manufacturing sites shall neither incinerate hydrocarbon-based materials for energy production nor source power from providers that engage in such practices. Waste containing fossil materials, including but not limited to incinerated household waste containing plastics, shall not be utilised as an energy source.

5.2 Transportation

5.2.1 The entire supply chain shall utilise fossil free transportation methods, including internal transportation (e.g., forklifts). This includes, but is not limited to, upstream transportation and distribution, such as the movement of raw materials and components to the manufacturing facility, and downstream transportation and distribution up to the point of final product delivery.

5.2.2 Electric vehicles shall be charged with renewable electricity.

5.2.3 Biofuels shall not be used unless they demonstrably do not contribute to deforestation or other environmental harms and contain no fossil fuels.

5.3 Storage

Storage facilities for raw materials, components, and finished products shall not run on oil, fossil gas, coal or peat. This includes space heating and cooling.

5.4 Supplier requirements/Chain of custody

Suppliers shall adhere to the same fossil free criteria outlined in this document. The chain of custody shall be assured with verifiable procedures.

5.5 Supply chain delimitation

5.5.1 Emissions from business travel and employee commuting shall not be considered for the application of this document.

5.5.2 Emissions resulting from the use of a product by consumers shall not be considered for the application of this document.

5.5.3 The machines used in the supply chain of fossil free products or components are allowed to have been produced in a non-fossil free manner, but shall not operate on oil, fossil gas, coal or peat as energy sources. This includes machines used for capturing and converting renewable energy, including but not limited to solar panels, wind turbines and batteries.

5.5.4 Combustion machines or products (vehicles and certain appliances) are only eligible if they can operate 100 % on fossil free energy sources and do not rely on blended fuels that still contain fossil elements.

5.5.5 Backup generators shall not run on fossil fuels. Acceptable alternatives include generators or batteries powered by renewable energy sources.

5.5.6 Personnel areas within manufacturing sites and data centres (see Clause 6) shall be powered by fossil free electricity, heating and other utilities, prohibiting the use of fossil gas or other fossil fuels.

5.5.7 If a service is able to provide clarity on all its components and supply chain according to this document, it can be considered a fossil free product. This clause shall be valid until a more detailed document for fossil free services is developed.

6 Digital Products

6.1 Energy Sourcing

The website's server or data centre hosting digital products shall operate entirely on renewable energy sources (see subclause 5.1), including primary operations, cooling systems, and emergency backup sources.

6.2 DNS host

The DNS host used for digital products shall also meet the same renewable energy requirements as the hosting provider, ensuring consistency across all services involved in the digital product's operation.

6.3 Subprocessors

All subprocessors involved in the supply chain of digital products down to the second level shall operate using renewable energy sources exclusively. Subprocessors include those called from both front- and back-ends of digital products and include, but are not limited to:

- API Services:
 - API services called from either front- or back-end of websites and mobile applications (including but not limited to services providing artificial intelligence).
- Third-Party 'Plugins':
 - Serving of 3rd-party 'plugins' used by a website's frontend, where such plugins are served by the 3rd party directly or via another server such as a CDN.
- Content Delivery Networks (CDNs):
 - Any resources served (to any global users) via a Content Delivery Network.
- Social Media Plugins:

- Plugins enabling social media interactions integrated into digital products.
- Hosted Media:
 - Videos and images hosted by third parties.
- Visitor Analytics Tools:
 - Tools used to track and analyse visitor behaviour on digital products.
- System Log Analytics and Error Reporting Systems:
 - External systems collecting, managing, analysing and/or responding to system logs and errors.
- Advertising Networks:
 - Advertisements served by third-party advertising networks.
- Fonts and Icons:

Fonts and/or icons served by third-party providers.

6.4 Digital supply chain delimitation

6.4.1 The energy usage of end-user hardware devices (e.g., computers, smartphones, tablets) used to access digital products (such as websites or apps) shall not be considered for the application of this document.

6.4.2 The energy consumed during the software development phase, including the use of development tools, integrated development environments (IDEs), and local development machines, shall not be considered for the application of this document.

6.4.3 Energy consumed by servers and systems in testing and staging environments, which are used for pre-production testing and quality assurance but are not part of the live production system, shall not be considered for the application of this document.

6.4.4 Hybrid products, which contain both physical and digital components, shall adhere to the requirements outlined for both physical and digital products in this document. They shall meet all relevant criteria across both categories to be considered fossil free.

7 Partially fossil free products

7.1 General

Partially fossil free products shall clearly identify both which material components and which stages of the supply chain rely on fossil fuels, and which parts are fossil free. Certification for a partially fossil free product is only possible when at least one stage in both the material component (e.g., bioplastics, cotton) and the supply chain (e.g., manufacturing powered by renewable energy) is fossil free. Such products can still pursue certification under the following conditions:

- Fossil Materials: If any part of the product contains fossil materials (e.g., crude oil-based plastics, lubricants, cement made from limestone), this shall be disclosed, and the product labelled as partially fossil free.

- **Fossil Fuel Energy Use:** If fossil fuels are used for energy at any stage of the supply chain (e.g., manufacturing, transportation), this shall be disclosed and the product labelled as partially fossil free.

7.2 Raw materials

For products to be certified as fossil free or partially fossil free, the following guidelines on raw materials shall be met:

- **Traceability:** Raw materials shall be traceable through the supply chain, with clear documentation of the energy sources used during extraction and processing.
- **Fossil Materials:** Products containing such materials as inputs (e.g., petrochemical plastics, lubricants, cement made from limestone) are permitted only for partially fossil free products and shall be disclosed.
- **Recycled Materials:** If recycled materials contain fossil material components, this shall be disclosed, and the product labelled as partially fossil free.

7.3 How fossil free is a partially fossil free product?

Partially fossil free products shall disclose the percentage to which their supply chain is fossil free on the product, visibly next to the “partially fossil free product” label. For the aspects of labelling and certification, EN ISO 14024:2018 and EN ISO/IEC 17065:2012 respectively, shall be used. For calculating the percentage, the following guidance applies:

- Fossil free and non-fossil free parts of the supply chain, including fossil materials and energy use shall be identified.
- The full price of the product shall be broken down and assigned to the different parts of the supply chain, according to the company’s internal accounting procedures.
- The percentage of the supply chain that is fossil free shall be characterised by the percentage of the financial value that corresponds to the fossil free sections of the supply chain.
- The percentage shall be specified on the product and recalculated at least once per year.

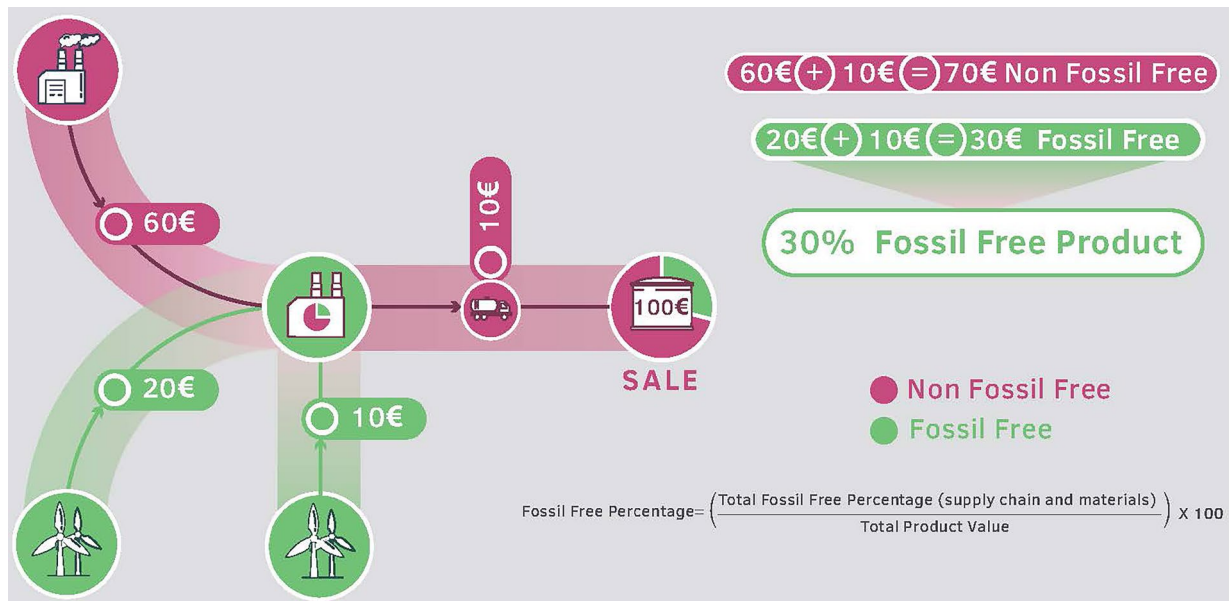


Figure 3 — Calculating the Fossil Free Percentage of a Product

Figure 3 illustrates the method for calculating the fossil free percentage of a product by considering the fossil free components in both the supply chain and materials. The formula presented determines the fossil free percentage by dividing the total fossil free value (materials and supply chain) by the total product value and multiplying by 100. The example in the figure visually represents different cost components, demonstrating how to determine the proportion of the product that qualifies as fossil free. This approach ensures transparency in fossil free claims and provides a standardized way to communicate the fossil free status of a product.

8 Transparency

All fossil free and partially fossil free products shall display a clear label indicating the fossil free status. This label shall include the following information:

- Declaration of any energy sources used during the production process that should not be used (e.g. biomass used in installations exceeding 5 MW capacity, nuclear). If energy sources that should not be used are present in the supply chain, an icon indicating the respective source of energy shall be displayed next to the label.
- For partially fossil free products, the exact percentage of the supply chain that is fossil free shall be displayed on the product, calculated in accordance with subclause 7.3.
- A QR code shall be displayed on the product next to the label, providing access to detailed information about the energy sources used and other relevant data. This QR code shall link to a web page or document that clearly discloses:
 - The breakdown of fossil free and non-fossil free elements of the supply chain, in accordance with Figure 3;
 - The percentage of fossil free content;
 - Any relevant explanations about the product's environmental impact and energy use;

- Optional: An indication of the producer's intention to move towards full fossil free status, including an anticipated timeline.

The following checklist provides mandatory guidance for the verification of a supply chain as fossil free, or partially fossil free. All questions shall be answered Yes for a supply chain to be considered as fossil free, and where a question is answered No, the respective part of the supply chain shall count towards the non-fossil free part of the supply chain. If a question in the checklist does not apply to the product or service, N/A shall be answered.

Table 1 — Checklist

Section	Yes / No / N/A
Raw Material Extraction	
Are the raw materials used in the product free from fossil materials?	
Were the raw materials extracted using fossil fuel free processes, including the powering of machinery and extraction equipment?	
Material Processing	
Is the energy used in processing the raw materials fossil fuel free?	
Are all chemicals or lubricants used in processing free of fossil materials?	
Manufacturing	
Is the energy used in manufacturing fossil fuel free?	
Are details on how much of the manufacturing process is powered by renewable energy (e.g., electricity from solar, geothermal, or other renewable sources) available?	
Are personnel areas in manufacturing sites powered by fossil fuel free energy?	
Packaging	
Primary Packaging: If the product is packaged, is the primary packaging (the packaging that directly contains the product) fossil free?	
Secondary Packaging: If the product is packaged, is the secondary packaging (the packaging used for transportation, storage, or display) fossil free?	
Transportation	
Is every leg of transportation - from the point where all raw materials originate, through each processing facility, and up until the final product is delivered - verified with documentation proving fossil fuel free status?	
Can you appropriately monitor modes of transportation used upstream and downstream?	
Distribution Centres	
Are the distribution centres fossil fuel free in terms of energy use?	
Are internal logistics within these facilities (e.g., forklifts, conveyors) fossil fuel free?	
Storage	

Are storage facilities along the supply chain powered by renewable energy?	
Supply Chains	
Do you have full visibility over every stage of your product's supply chain?	
Can you ensure that your partners (suppliers, manufacturers, logistics providers, retailers) adhere to fossil free practices?	
Backup Energy	
Are all backup energy sources in your supply chain (i.e. generators) fossil fuel free?	
Transparency	
Does the label clearly and correctly specify the scope of the fossil free claim (e.g., "X% Partial Fossil Free Product or "Fossil Free Product")?	
If energy sources that should not be used, are used in the supply chain, do you clearly specify on your product the percentage of energy used from categories that should not be used in a fossil free product?	
If the product is partially fossil free, is the relevant information, in particular any remaining fossil fuel use in the supply chain (see also the following points) fully disclosed and clearly specified on the product and available online via a QR code on the product?	
Fossil Free and Non-Fossil Free Components (only for partially fossil free products)	
Is a full list of all fossil free and non-fossil free elements of the product, and/or legs of the supply chain provided on the product/accessible via QR code on the product?	
Are the financial values of fossil free vs. non-fossil free components correctly provided on the product, based on the company's accounting system, relative to the total product value?	
Improvement Over Time (only for partially fossil free products)	
Is the history of the (ideally increasing) fossil free percentage of the product over time provided on the product or via QR code from the product, with at least annual granularity?	
Digital Products	
Are the digital products and their components fossil free?	
Energy Sourcing	
Does the server or data center hosting the digital product meet the fossil fuel free energy requirements outlined in subclause 5.1, including primary operations, cooling systems, and emergency backup sources (e.g., no diesel generators)?	
DNS Hosting	
Does the DNS host used for digital products meet the fossil fuel free energy requirements outlined in subclause 5.1?	
Do all subprocessors (Down to the Second Level) meet the fossil fuel free energy requirements outlined in subclause 5.1?	

Do all API services called from either the front-end or back-end of websites and mobile applications (e.g., AI services) meet the fossil fuel free energy requirements outlined in subclause 5.1?	
Do all third-party plugins served directly by a third party or via a CDN meet the fossil fuel free energy requirements outlined in subclause 5.1?	
Do all Content Delivery Networks (CDNs) used to serve resources globally meet the fossil fuel free energy requirements outlined in subclause 5.1?	
Do all social media plugins integrated into the digital product meet the fossil fuel free energy requirements outlined in subclause 5.1?	
Do all hosted media files (videos, images) provided by third-party services meet the fossil fuel free energy requirements outlined in subclause 5.1?	
Do all visitor analytics tools used for tracking and analyzing visitor behavior meet the fossil fuel free energy requirements outlined in subclause 5.1?	
Do all system log analytics and error reporting systems meet the fossil fuel free energy requirements outlined in subclause 5.1?	
Do all advertising networks serving ads on digital products meet the fossil fuel free energy requirements outlined in subclause 5.1?	
Do all fonts and icons served by third-party providers meet the fossil fuel free energy requirements outlined in subclause 5.1?	
Do all other electronically linked, included, or called digital products required by the primary digital product meet the fossil fuel free energy requirements outlined in subclause 5.1?	

Annex A (informative)

Frequently Asked Questions

A.1 Fossil Free Certification Scope and Focus

1. FAQ: What if I can't eliminate fossil fuels from my supply chain?

Answer: Completely eliminating fossil fuels from a supply chain may not be immediately feasible in certain regions or industries due to technical, economic, or infrastructural barriers. That's why there is an option of partially fossil free products. For partially fossil free products, the exact percentage of fossil free content will be displayed on the product, and a QR code will provide more detailed information about the fossil free and non-fossil free elements of the supply chain. This ensures transparency while allowing you to work toward further decarbonisation over time.

2. FAQ: Why doesn't this document include GHG emissions accounting?

Answer: This document focuses solely on eliminating fossil fuel use from supply chains, providing a different (and potentially simpler) way to assess a product's climate impact. Unlike other standards, it does not require greenhouse gas (GHG) emissions accounting. Instead, the focus is on fossil free practices, which inherently reduce GHG emissions without the need for complex emissions calculations.

3. FAQ: Why doesn't this CWA include other sustainability topics like recycling or circularity?

Answer: This CWA is focused specifically on eliminating fossil fuel use from supply chains. While topics like circularity, recycling, and reducing single-use plastics are crucial for broader environmental sustainability, this CWA addresses the need to end fossil fuel reliance.

4. FAQ: Is this a standard?

Answer: No, this is not a standard. It is a CWA (CEN Workshop Agreement), which serves as a pre-standardization document developed collaboratively through a consensus-based process. A CWA can inform future standards but does not hold the regulatory weight of a formal standard. It provides guidelines and recommendations that organisations can voluntarily adopt to help transition towards fossil free supply chains.

A.2 Materials and Components

5. FAQ: Why aren't oil and fossil gas allowed as raw materials in fossil free products, even if they aren't burned as fuels?

Answer: The core issue lies in the environmental impact of fossil fuel extraction. From the moment companies begin exploratory drilling or mining for fossil fuels, significant environmental harm occurs. Methane, a potent greenhouse gas, normally leaks during these processes. Methane leakage is even worse for the environment than flaring (burning off the gas), as it contributes more heavily to climate change without any energy benefit. There is currently no known method of fossil fuel extraction that could ensure zero methane leakage over all lifecycle stages of an extraction project or fully mitigate the other negative environmental impacts associated with extraction.

Moreover, if oil and gas were to be extracted for the purpose of creating "fossil free" products, it would contradict the core objective of this CWA. Even if these fossil materials aren't burned, allowing their use would continue to fuel the fossil extraction industry, undermining the aim to eliminate fossil fuel dependency.

For these reasons, oil- and fossil gas-derived materials are not permitted in fully fossil free products. Products that do contain such materials may still become "partially fossil free," but full fossil free certification requires the absence of fossil fuels and fossil materials.

6. FAQ: Can a product made from plastic be considered a fossil free product?

Answer: If it is made from plant-based plastic, yes. If it is made from oil or fossil gas, then it can only be a partially fossil free product under this CWA, provided that parts or all of the rest of its supply chain are fossil free. The percentage of the supply chain that is fossil free will be indicated on the product, and more detailed information will be available via a QR code on the product. The fossil-derived raw material of such a product counts toward the non-fossil free part of its supply chain.

7. FAQ: What if a company is using recycled materials but cannot verify the origin of those materials?

Answer: If a company aims to incorporate recycled materials into their products but cannot trace the origin or verify whether fossil fuels were used in their original production, those recycled components shall be classified as non-fossil free. This includes scenarios where materials are mixed or melted together without clear documentation of their fossil fuel content.

Companies should refer to the guidelines for partially fossil free products when they cannot guarantee full fossil free supply chains. In such cases, products may be labelled as "partially fossil free" if fossil fuel content or energy use cannot be fully excluded.

Additionally, companies are encouraged to work toward improving transparency in their supply chains over time. This includes collaborating with recycling suppliers to enhance traceability, as well as increasing the proportion of traceable and verified fossil free materials in their production processes.

8. FAQ: What if my raw material is partially fossil free and partially not?

Answer: In this case, you can break down your supply chain into separate components that are fossil free and those that are not. For instance, if a subcomponent of your supply chain is mixed (e.g., a recycled material containing both fossil-based and non-fossil elements), you shall quantify and disclose the proportion of fossil free content. If you don't break it down further, the entire leg of the supply chain where this partially fossil free component is used will count as non-fossil free. Essentially, the "pollution" from fossil fuels or materials affects the entire supply chain component, making it non-fossil free. This encourages companies to be transparent and diligent in tracing and separating fossil free elements.

A.3 Energy Sources and Usage

9. FAQ: Can a fossil free product be produced with nuclear energy?

Answer: A fossil free product should not be produced using nuclear energy, according to the guidance of the document. However, this is not part of the mandatory requirements, which focus specifically on the presence or absence of fossil fuels or fossil materials in the supply chain. In theory, a fully fossil free product could be produced with nuclear energy, but it shall be clearly

labelled as such. For partially fossil free products, nuclear energy may also be present in the non-fossil free portion of the supply chain and should be disclosed accordingly.

10. FAQ: Why does the document allow biomass even though it can produce more CO₂ than fossil fuels?

Answer: Our document is focused on fossil fuel use, not on greenhouse gas (GHG) emissions or carbon accounting. The primary objective is to eliminate the burning of fossil fuels like oil, fossil gas, coal, and peat from supply chains. While it is true that burning biomass can emit more CO₂ per unit of energy than fossil fuels, this document is mainly concerned with fossil fuel dependency.

GHG emissions are a valid concern, and the document encourages transparency around energy sources, including those that "should not" be used. The transparency requirements in the document aim to push companies toward cleaner practices by making such energy sources visible, thus encouraging the removal of these practices over time.

A.4 Digital Products and Supply Chain Delimitations

11. FAQ: Why is the energy usage of end-user hardware devices (e.g., computers, smartphones, tablets) excluded from the fossil free certification of digital products?

Answer: Because service providers tend to have no control over the personal devices or energy choices of their users. For example, while a website or app may be hosted on fossil free servers, the individual accessing the platform may be using a device powered by non-renewable energy. Including these factors would make certification almost impossible, as every individual user's device and energy source would need to be verified.

This is similar to how fossil free products can be transported in fossil-fuelled vehicles by consumers after purchase - the product itself remains certified fossil free, regardless of how the buyer transports it.

The goal of the certification is to ensure that the digital product and its supply chain are fossil free, not to regulate or control the energy consumption of individual users or their devices.

12. FAQ: Why isn't the energy consumed during the software development phase included in the certification criteria?

Answer: The energy consumed during the software development phase is excluded from certification because the focus is on current operations and energy use. For example, software developed in the 1990s may now be hosted on fossil free servers and thus qualify for certification. The certification applies to the current infrastructure running the software, not its historical development process.

This is analogous to how fossil free products are certified based on their current manufacturing process, not on how the machines that make them were originally built. Companies offering digital services are responsible for ensuring their current operations meet the fossil free criteria, but historical development energy usage is outside the scope of certification.

Tracking development energy use could be a voluntary practice for companies seeking transparency, but it won't impact their eligibility for fossil free certification.

A.5 Consumer Use

13. FAQ: Are emissions from consumer use of sold products included in the fossil free criteria?

Answer: No, emissions resulting from the use of sold products by consumers are not considered in the fossil free certification criteria.

EXAMPLE If a product requires electricity to operate, such as a refrigerator or a mobile phone, the emissions from the electricity generation at the consumer's location are excluded from the certification process. The fossil free certification only covers the product's supply chain up to the point of sale.

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