ADDITIONALITY CRITERIA

Requirements for Circular Economy Projects

Bloom ESG

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Version 1.1

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Section 1 - Introduction

1. Introduction

1.1 Purpose

This *Positive List* is a simple, plain-language guide to when circular economy activities can be treated as automatically additional, meaning they genuinely need carbon finance to happen. It sets clear percentage thresholds for each material type and explains the guardrails (legal surplus, evidence/MRV, ex-post issuance) so you can see at a glance whether a project qualifies without wading through technical jargon.

Use it if you're a project developer, recycler, refurbisher, producer responsibility organisation, or a buyer looking to claim certificates through operations or procurement. Check your material category, compare your results to the threshold, and—where EPR rules exist—claim only the beyond-compliance surplus.

1.2 Eligibility Requirements

There are three simple rules keep this programme fair and credible:

1. **Legal check**: Project activities must be voluntary. We cannot credit what the law or an EPR scheme already requires. If a rule applies, we only credit the extra (the "surplus")
2. **Evidence (MRV)**: Keep clear records of what was collected, where it went, and what new products were made (where applicable)
3. **Ex-post only**: We issue credits only after results are measured and verified. The registry serves as a platform for the issuance, transfer, and retirement of Environmental Attribute Certificates (EACs) generated within corporate supply chains only. It enables project proponents to register and manage projects, ensuring that emission reductions are recorded and verified according to established standards. The registry operates based on key principles, including transparency, certificate integrity, and adherence to internationally recognized best practices.

1.3 Approved Certificates

EACs currently supported on the registry are collectively called Circular Economy (CE) Certificates. There are three types of CE Certificates:

- **I-TEC Certificates (IT Asset Reuse Certificates):** Represent the carbon intensity of 1 kilogram of e-waste assets put back into re-use.
- **I-TEC AE Certificates (IT Asset Reuse Avoided Emissions Certificate):** avoidance of 1 metric ton of CO_2e through reuse. These certificates directly

quantify the climate benefit of extending product lifecycles, reducing demand for virgin material production.

- **I-MAT Certificates**: Provide proof that 1 ton of metal has been produced from recycled sources rather than from mined raw materials. This enables corporates to track and credibly claim circular sourcing within their value chains.
- **I-MAT AE Certificates** (Materials Avoided Emissions Certificate): Represent the avoidance of 1 metric ton of CO_2e specifically from materials recovery. This bridges the material recovery process with its climate benefit, reinforcing both environmental and supply-chain integrity.

1.4 Thresholds for Automatic Additionality

The following list of materials and assets by region may be deemed automatically additional.

Material	What counts	Automatically additional	Notes
E-waste (electronics)	Collecting and treating used electronics through licensed systems	Auto-additional when: i. Route A: the formal, documented recycling rate is < 30% ii. Route B: the rate is ≥ 30% but below the legal target AND the project meets ≥1 qualifier: – Sub-stream underperforms (<25%). – Quality uplift (e.g., closed-loop or high-spec treatment such as refurbishment and re-use rather instead of recycling). – Access expansion (hard-to-reach; high marginal cost). – Informal flow displacement (≥ X% diversion proved). – Early action before a new rule takes effect.	Always show it is voluntary (or only claim the surplus beyond EPR). Keep records: weights, destinations, and permits.

		iii. Route C: use full additionality test if A/B not met.	
Textiles	Turning old textiles into new textiles (fiber-to-fiber); or high-grade reuse (e.g., open loop applications).	Auto-additional when: i. Fiber-to-fiber recycling share < 20%; or ii. Total textile recycling < 20%.	Prove quality (e.g., yarn spec, durability) and avoid double counting with any legal take-back schemes.
Plastics	Plastic-to-plastic recycling (mechanical or chemical) that makes new plastic, not fuel.	Auto-additional when i. National plastics recycling < 25%; or ii. Recycled-content share in production < 15%.	Track chain-of-custody; count only material uses. Energy recovery is not eligible.
Li-ion Batteries	Collection, safe recycling, and second-life uses of lithium-ion batteries.	Auto-additional when: i. Recycling penetration < 40%; or ii. There is no proven second-life market infrastructure.	Document safety, yields, and destination. Stop automatic eligibility if a binding mandate covers it.
Remanufacture (electronics or components)	Bringing devices or components back to “like-new” for reuse at scale.	Auto-additional when: i. Remanufactured share of the product market < 30%.	Use a clear performance standard (function tests + minimum warranty).
Verified Recycled Content Procurement	Demand-pull via offtake or long-term contracts for recycled materials or certified treatment.	Auto-additional when: i. Contract lifts recycled content to ≥ 30%; and ii. No law requires that level; and	Link contracts to outputs; credit only ex-post delivered volumes; avoid legal/EPR overlaps.

Rubber & ELTs (end-of-life tyres)	Material recycling: granulate/powder, devulcanized rubber, recovered carbon black or chemical feedstock. Energy recovery (TDF) is excluded.	Auto-additional when any of the following is true: i. Material-recycling share (excluding energy) < 45%. ii. Closed-loop rubber-to-rubber back into rubber/tyres) < 10% of ELT arisings. iii. ELT-derived oils/gases used as chemical feedstock < 10% of ELT arisings.	Count only material uses (no TDF).

1.5 Working with EPR Rules

Where an Extended Producer Responsibility (EPR) law says "collect and recycle", that sets the baseline. You may still qualify for credits for the extra you do. This may include:

1. Collect and process more materials than are required (i.e., extra tonnes above the minimum target)
2. Collect materials earlier than required (before the rule starts)
3. Collect materials and products that fall outside the requirements
4. Process materials and products beyond the minimum requirements (e.g., refurbishment instead of low-grade recycling)

1.6 Version Control and Updates

This guide is periodically updated to reflect changes in registry policies, processes, or standards. Users should refer to the latest version to ensure compliance with current requirements.

Version	Date	Adjustments
V1.0	01/09/2025	
V1.1 (current)	01/12/2025	Amended to reflect I-TEC certificates are issued for carbon intensity attributes.

1.7 Support and Contact Information

For assistance with registry operations, users may contact the registry support team. The registry support team can be contacted at registry@bloom-esg.com.