

Public Summary - RSB Audit

Roundtable on Sustainable Biomaterials (RSB)



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|--------------------------------|--|
| Control Union PRJ number | 830353 |
| RSB Participating Operator Nr. | 1403 |
| Name contact person: | Mr. Patrick Lynch |
| Address organization: | 198 High Holborn London WC1V 7BD |
| Telephone: | +44 (0) 20 7421 2329 |
| e-mail: | patrick.lynch@greenergy.com |
| Type of certificate: | Multi-site |
| Date of issue of certificate: | 03-03-15 |
| Certificate expiry date | 02-03-17 |
| | |
| Date audit: | 11-09-2014 and 12-09-2014 |
| Report finalized: | 24-10-2014 |
| | |
| Certificate issued by: | Control Union Certifications |
| Address: | Meeuwenlaan 4-6 8011 BZ Zwolle |
| Telephone: | 0031 (0) 38 426 0100 |
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| | |
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| Certifier (contact person): | Frank van der Velden |
| | |
| Lead Auditor | Glenn Feryn |

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1. Methodology

Control Union Certifications (CUC), is an international inspection and certification Audit and certification is carried out in conformity with the procedures as laid down in Based on the information provided by the auditor and by the client, the certifier reviews and evaluates all information provided and certifies the products when all conditions of the regulations are fulfilled. The result of the evaluation is documented in this report and the applicable Annexes. Audit work by the auditor and certification by the certifier are clearly separated activities.

2. Report

This report is the result of the findings of a certification evaluation carried out by an independent lead auditor or team of experts representing Control Union Certifications. The purpose of the assessment was to evaluate the compliance of the client with respect to the standards used within the scope of the certificate. The report is made in accordance with standard RSB-STD-11-001-70-003

The full report can only be reviewed by authorized Control Union and RSB staff.

In case of any complaint or appeal with respect to findings and certification decisions taken by CUC, a dispute protocol and form is available on the CUC website:

http://certifications.controlunion.com/publications.aspx?Program_ID=2
and can also be provided on request.

3. Certification scope

| | |
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| The scope assessment is inline which is agreed by the operator | Yes |
|--|-----|

Participating sites

| | |
|-------------------------------|--|
| Participating site I | Greenery Fuels Ltd (Trading office) |
| Address: | 198 High Holborn, London WC1V7BD, United Kingdom |
| Participating site II | Greenery Immingham (Biodiesel Plant) |
| Address: | West Riverside Immingham Dock, DN402QU Immingham, Hull |
| Participating site III | North Cave Ltd (Refinery) |

Address: HU 15 2PG, Crosslands Lane, North Cave, East Yorkshire, United Kingdom

Type of activities

Description of activities
 Purchase of UCO
 pre-treatment of UCO at North Cave
 Processing UCO to UCOME at Immingham

Applicable standards

| <i>Description</i> | <i>Number</i> |
|--|-----------------------|
| Standard for participating operators | RSB-STD-11-001-30-001 |
| Procedure on communication and claims | RSB-PRO-11-001-50-001 |
| Standard for risk management | RSB-STD-11-001-60-00 |
| Generic chain of custody standard | RSB-STD-11-001-20-001 |
| "Mass balance of product" chain of custody | RSB-STD-11-001-20-004 |
| RSB Standard for certification of biofuels based | RSB-STD-01-010 |
| Principles & Criteria | RSB-STD-11-001-01-001 |
| RSB Standard for EU market access | RSB-STD-11-001 |

4. Evaluation process

4.1. Audit Team

Glenn Feryn, RSB Lead Auditor

4.2. Duration and justification audit

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|---------------------------------|--|
| Expected duration (in hours): | 17 hours |
| Justification | Preparation time: 2 hours, office audit Manchester: 7 hours, site visits Immingham and North Cave: 6 hours, reporting: 2 hours |
| Real Audit Duration (in hours): | 17 hours |

4.3. Description of the evaluation / evaluation

Opening meeting
 Evaluation of documented/company system
 audit closure 1st audit day

Opening meeting day 2
 Field inspection / Site visit (Immingham + North Cave)

Reporting
 Review of NC's
 Closing Meeting

4.4 People interviewed

Mr. Patrick Lynch (Biofuel Sustainability Manager), Mr. Fayad Hirani (Compliance & Stocks Manager), Mr. Benjamin Hartland (RTFO & stocks administrator), Mr. Johannes Dunn (Finance Operations), Mr. Bradley Lambert (Ops Manager Immingham), Mr. Steward Hall (Sr. Process Engineer Immingham), Mrs. Sally Murray (Administration Simon Storage), Mr. Lee Sanderson (Operations manager North Cave), Mrs. Rebecca Hill (Administration North Cave), Mr. Wayne Howell (process operator North Cave, phone call), Mrs. Angela Cockerton (office services Immingham, phone call) and Mr. Luke Clayton (terminal operations Immingham, phone call)

4.5 Action taken by the organization prior to (re)issue of certificate

Greenergy has made up an introduction document: "RSB Audit '14 Sustainability reporting systems ". A risk assessment and screening exercise has been done. A GHG calculation has been done (via the RSB tool). Relevant stakeholders have been consulted and an Conservation Impact Assessment has been set up.

5. Risk Analysis & Sampling plan

Risk analysis results

Total number of subsidiaries, branch offices, affiliated entities, external third parties contracted or otherwise engaged, operational structures, sites, facilities, processing and production units, and supply chain structures

Greenergy's sustainability team is divided between the London and Manchester offices, with most based in Manchester. Both the pre-treatment unit (North Cave) as the conversion unit (Immingham) has been visited during the audit. During the visit it has also been verified that the incoming UCO complies to the Reactive guidances on UCO/Chain of custody (reference RSB-GUI-RG-2014-02 and RSB-GUI-RG-2014-03)

Set-up Sampling plan

| | |
|--|-----|
| Participating Operator Risk Class | 2 |
| Disputes or prior Non-compliances | N/A |
| Changes in scope since last evaluation | N/A |
| Total number of compliance claims | N/A |

Risk assessment result

| Results: | Deviations from Operator Risk Assessment | Risk Factor |
|-------------------------|--|-------------|
| Risk Class CUC: 1.86 | RF 1.10.2.1 => Difference +1 RF 1.13.2 => Difference +1,5 RF 1.14.1.1 => Difference +2 RF 1.14.1.2 => Difference +2 RF 1.14.1.3 => Difference +2 | 0,24 |

Operations visited

| | |
|---|--|
| Manchester office Suite 12, Egerton House (South Side) Towers Business Park, Wilmslow Road Didsbury, Manchester M20 2DX | Administration office on behalf of Trading unit London |
|---|--|

Date: 41893

Name operation / site:

Activities:

Immingham site
West Riverside, Immingham, South
Humberside DN40 2QU, UK
Administration: Suite

Conversion unit

Date: 41894

| | |
|--|--------------------------|
| Name operation / site: | Activities: |
| North Cave HU15 2PG Crosslands Lane, North Cave, East Yorkshire, HU15 2PG UK | Pre-esterification plant |
| Date: | 41894 |

6. Observations

6.1 non-conformities

Non-compliance: failure to comply with one or more requirements specified in the RSB standards and/or the RSB certification systems

6.1.1 Evaluation of Non-conformities

CUC shall monitor and evaluate all actions taken by the participating operator to address non-finalization of the evaluation report CUC shall evaluate at minimum those aspects of the operation(s) of CUC shall ensure that recommendations to close major non-compliances, and whether major non-compliances were corrected, rectified or otherwise brought into compliance with the RSB standards and the RSB certification systems, together with the respective certification reports are submitted to peer review and duly decided by its certification decision entity.

6.1.2. Identified non-conformities during present evaluation

Non-compliance (NCs) identified during this evaluation are listed below. In case the organization has Each element (requirement) of the Standard is evaluated by means of a checklist. Please refer to the annexed checklists for details.

6.1.3. Assessment of non-compliance raised during and after previous audit report

Check if section is not applicable, i.e. it concerns a main assessment/initial audit, or no NCs were raised Below an overview is given of the actions taken by the client/certificate holder to correct any NC's For each NC a description of its current status is given. In the case a minor NC has not been settled within NC1

| | |
|--------------------------------|---|
| Category | Major |
| Description of requirement: | The participating operator shall establish, document, implement and maintain procedures and/or work instructions covering all applicable requirements of this standard. |
| Description of non-conformity: | Procedures / Work instructions did not comply fully to the RSB requirements |
| Status: | Closed succesfully |
| NC2 | |
| Category | Major |
| Description of requirement: | The PO should keep an up to date self-risk assessment |
| Description of non-conformity: | The RSB self risk assessment did not fully comply to the RSB requirements |
| Status: | Closed succesfully |
| NC3 | |
| Category | Major |
| Description of requirement: | Signed agreement between RSB and the participating operator shall be in place. |

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| Description of non-conformity: | | Signed agreement according the RSB requirements was not available during the audit |
| Status: | | Closed succesfully |
| NC4 | | |
| Category | | Major |
| Description of requirement: | | The GHG emissions of biofuel shall be calculated using the RSB lifecycle GHG emission calculation methodology |
| Description of non-conformity: | | Advanced GHG calculation was available but not all inputs were calculated according RSB requirements. |
| Status: | | Closed succesfully |
| NC5 | | |
| Category | | Major |
| Description of requirement: | | The PO should keep a up to date a self-evaluation of the operations based on the RSB standards |
| Description of non-conformity: | | The self-evaluation did not fully comply to the RSB requirements |
| Status: | | Closed succesfully |
| NC6 | | |
| Category | | Major |
| Description of requirement: | | PO shall undertake an impact assessment process to assess impacts and risks and ensure sustainability through the development of effective and efficient implementation, mitigation, monitoring and evaluation plans. |
| Description of non-conformity: | | The impact assessment did not fully comply to the RSB requirements |
| Status: | | Closed succesfully |
| NC7 | | |
| Category | | Major |
| Description of requirement: | | Free, Prior & Informed Consent (FPIC) shall form the basis for the process to be followed during all stakeholder consultation, which shall be gender sensitive and result in consensus---driven negotiated agreements. |
| Description of non-conformity: | | Stakeholder consultation not completed fully according the RSB requirements |
| Status: | | Closed succesfully |
| 6.2 Certification decision 6.2.1. Statement | | |

The Organization has been (re-)assessed by CUC according to the standard(s) described in Section 6
The Organization is in conformance with the certification requirements (all major NC's are closed),
The Organization is NOT in conformance with the certification requirements (all major NC's are not

For all other information please use fvdvelden@controlunion.com and/or the following address:

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