

Certification Evaluation Report

Roundtable on Sustainable Biomaterials

Camelina Company España S.L.

SCS Certificate Code-SCS-RSB/PC-0015

Address: Calle Vía Límite 7, 28029, Madrid, España

Email: info@camelinacompany.es

Web: www.camelinacompany.es

CERTIFIED	EXPIRATION
April 9, 2015	April 8, 2017

DATE OF FIELD AUDIT
February 16 th to 18 th , 2015
DATE OF LAST UPDATE
April 24, 2015

SCS Contact:
Neil Mendenhall | Manager
Environmental Certification Services
+1.510.452.8018
nmendenhall@scsglobalservices.com

SCSglobal
SERVICES

Setting the standard for sustainability™

2000 Powell Street, Ste. 600, Emeryville, CA 94608 USA

+1.510.452.8000 main | +1.510.452.8001 fax

www.SCSglobalServices.com

FOREWORD

SCS Global Services (SCS) is a certification body accredited by the Roundtable on Sustainable Biomaterials (RSB) to conduct evaluations of biofuel operators. Under the RSB/SCS certification system, participating operators meeting international standards of biofuel production can be certified as “sustainable,” thereby permitting the Operators use of the RSB endorsement and logo in the marketplace subject to regular RSB/SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts all over the world to conduct evaluations of biofuel operations. SCS evaluation teams collect and analyze written materials, conduct interviews with Participating Operator’s staff and key stakeholders, and complete field and office audits of the operation(s) identified in the certification scope. Upon completion of the fact-finding phase of all evaluations, SCS teams determine compliance to the RSB Principles and Criteria.

Please Note: An RSB certificate itself does not constitute evidence that a particular product supplied by the certificate holder is certified to RSB standards. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required RSB claim is clearly stated on-product. For more information about the RSB, visit their website at www.rsb.org.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Roundtable on Sustainable Biomaterials. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the Participating Operator, and the results of the evaluation. Section A will be posted on the RSB website. Section B contains more detailed results and information for use by the Participating Operator.

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SECTION A – PUBLIC SUMMARY

1.0 GENERAL INFORMATION

1.1 Operator Information

1.1.1 Name and Contact Information

Organization name	Camelina Company España S.L.		
Operator Number	347		
Contact person	Yuri Herreras		
Address	Calle Vía Límite 7	Telephone	+34 91 733 90 53
	28029, Madrid	Fax	
	España	e-mail	info@camelinacompany.es
		Website	www.camelinacompany.es

1.1.2 Additional Parties Involved

Organization name	LOGISTICA de GRANELES, S.L. - LOGIGRAN
Nature of Involvement:	
Cleaning and husking facility	

Organization name	OLCESA (ACESUR)
Nature of Involvement:	
Crushing facility	

Organization name	Demagrisa,
Nature of Involvement:	
Storage and transport of camelina oil	

Note: please see Appendix 2 for detailed company information and annual throughput.

1.2 Scope of Certificate

The scope assessment agrees with the scope under which the operator applied	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If no, please explain:		

Note: If the scope is different, please contact SCS.

AGRICULTURAL SITE INFORMATION	
Site Type	<input checked="" type="checkbox"/> Agriculture <input type="checkbox"/> Forestry
	<input checked="" type="checkbox"/> Biomass Production <input type="checkbox"/> Other:
Current Land Use	Prior Land Use
<input type="checkbox"/> Biomass Production	<input type="checkbox"/> Biomass Production
<input checked="" type="checkbox"/> Agriculture	<input checked="" type="checkbox"/> Agriculture
<input type="checkbox"/> Other:	<input type="checkbox"/> Other:
Current Employment on Site	Prior Employment on Site
<input type="checkbox"/> Negligible	<input type="checkbox"/> Negligible
<input checked="" type="checkbox"/> Local Average	<input checked="" type="checkbox"/> Local Average
<input type="checkbox"/> Above Local Average	<input type="checkbox"/> Above Local Average
<input type="checkbox"/> Full	<input type="checkbox"/> Full
Site Total Area (ha)	2150
Planted/Production Area (ha)	2150
Feedstock Produced	Camelina Seeds

1.3 Standards Used

1.3.1 Applicable RSB-Accredited Standards

Title	Version	Date of Finalization
RSB principle & Criteria, RSB-STD-11-01-001	2.1	May 2011
RSB Standard for Participating Operators RSB-STD-11-001-30-001	3.0	June 2014
RSB Standard for Traceability of RSB Certified Material (Chain of Custody) RSB-STD-11-001-20-001	3.1	Nov 2014
RSB GHG Calculation Methodology RSB-STD-01-003-01	2.1	Dec 2012
RSB Standard for Risk Management RSB-STD-11-001-60-001	3.0	May 2014
All standards employed are available on the websites of the Roundtable on Sustainable Biomaterials (http://rsb.org/sustainability/rsb-sustainability-standards/). Standards are also available, upon request, from SCS Global Services (http://www.scsglobalservices.com/).		

2.0 EVALUATION PLANNING & PROCESS

2.1 Documentation Submitted by Operator

Pre-audit tool	CCE RSB application 2014, CCE RSB Risk Assessment, CCE RSB Self evaluation
Environmental and Social Management Plan (ESMP)	Document describing all activities currently being undertaken by CCE to ensure RSB compliance.
Environmental and Social Management Plan (ESMP) - Section 5	CCE documentation included in the updated ESMP, covering the following Principles: 1, 2, 3, 4, 7, 8, 9, 10, 11.
CCE Procedures	Farmers residue, Farmer Labor, Safety and Health, Farmer Machinery, Transport Vehicle, Industrial facility, SIGPAC, conservation, Invasiveness, Soil, Camelina residue, RSB farmer selection, Traceability, Logo & claims, GHG industrial facilities
CCE Records	Annual records related to CCE Procedures
CCE GHG calculation	Methodology, Records and RSB tool calculations

2.2 Audit Type and Determination

The following table summarizes the audit types for RSB Audits:

	Low risk class	Medium risk class	High risk class
Certificate validity	2 years	2 years (pending successful surveillance audit)	1 year
Main audit	Every 2 years	Every 2 years	Every year
Surveillance audit	-	Every year	-

Main Audit includes desk + field-based compliance check of:

- Consolidated RSB EU RED Standard for Participating Operators (RSB-STD-11-001-30-001);
- Consolidated RSB EU RED Principles & Criteria (RSB-STD-11-001-01), including GHG Calculation (RSB-STD-01-003-01), Screening (RSB-GUI-01-002-02), Impact Assessments (if any) and ESMP;
- Consolidated RSB EU RED Standard for Risk Management (RSB-STD-11-001-60-001);

- Consolidated RSB EU RED Chain of Custody Requirements (RSB-STD-11-001-20) and associated system operating procedures; and
- Consolidated RSB EU RED Procedure on Communication and Claims (RSB-PRO-11-001-50-001).

Surveillance Audit includes desk-based compliance check of:

- Consolidated RSB EU RED Standard for Participating Operators (RSB-STD-11-001-30-001);
- GHG Calculation (RSB-STD-01-003-01); Consolidated RSB EU RED Standard for Risk Management (RSB-STD-11-001-60-001);

Consolidated RSB EU RED Chain of Custody Requirements (RSB-STD-11-001-20) and associated system operating procedures.

2.3 Audit Team

2.3.1 Determination of Audit Team

- Desk audits shall always be conducted by at minimum one (1) international lead auditor. The lead auditor appointed may include additional auditors and/or technical experts in the audit team if this is required by the extent of the audit.
- Field audits shall always be led by one (1) international lead auditor.
- The lead auditor appointed shall include at minimum one (1) local auditor in the audit team. The lead auditor appointed may include additional auditors and/or technical experts in the audit team if this is required by the extent of the audit.
- For field audits of participating operators in High Risk Class shall always the lead auditor appointed shall appoint at minimum
 - one (1) local auditor and
 - one (1) technical expert on social issues to evaluate compliance with social requirements and the risk of non-compliance due to social issues and
 - one (1) technical expert on environmental issues to evaluate compliance with environmental requirements and the risk of noncompliance due to environmental issues.
 - The lead auditor appointed may include additional auditors and/or technical experts in the audit team if this is required by the extent of the audit.

2.3.2 Audit Team

Auditor Name:	Nerida Ida Theinhardt	Auditor role:	Lead Auditor
Qualifications: Lead auditor for FSC, ISO 14001, OHSAS 18001 and RSB, with studies in Biology and specialization in Environmental Quality Systems, Occupational Health and Safety and Social Responsibility. She has extensive teaching and researching experience in environmental projects with Brick Towers College and Hamburg University. Nerida also worked as a researcher in Agriquality New Zealand and Department of Conservation, New Zealand. University of Canterbury, School of Forestry, New Zealand, 2002-2003: Master Ms. C.Universidad CAECE, Buenos Aires, 1991-1999: Biology			
Auditor Name:	Marinka Vignali	Auditor role:	Auditor

Qualifications: Marinka is a certified Auditor against 2 EU approved voluntary schemes (RSB and ISCC EU) and 2 RED national schemes (Italian national scheme and ISCC DE) with many years of experience in biofuels sector. Previously she has worked at European Commission for 9 years, at DG JRC -Renewable Energy Unit. She has received a Master in Chemical Engineering at Università degli Studi di Pisa (Pisa, Italy) and a PhD in Chemistry at University of Limerick (Limerick, Ireland).

2.4 Evaluation Itinerary and Activities

Date: 16-03-2015	
Operation(s)/ sites visited	Activities/ notes
Camelina office	Interview management representative, check evidence, check documentation
Date: 17-03-2015	
Operation(s)/ sites visited	Activities/ notes
Demagrisa Valencia Port facility	Demagrisa receive oil from Camelina, storage and logistics to ship
Farmers	Visited farmers - camelina seeds production
Logigran	Verification of physical traceability being mass balance managed by Camelina Company (visited by Marinka)
Date: 18-03-2015	
Operation(s)/ sites visited	Activities/ notes
Farmers	Visited farmers - camelina seeds production

2.5 Evaluation of Management System

2.5.1 Methodology and Strategies Employed

SCS deploys interdisciplinary teams with expertise in agriculture, ecology, forestry, social sciences, natural resource economics, and other relevant fields to assess an Operator's compliance to RSB standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of site and facility types, observation of implementation of management plans and policies, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant site observations, stakeholder comments, and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section.

2.5.2 Capacity of the participating operator to implement its management systems

Camelina Company España has ESMP V7 which is the procedures for controlling and monitoring the participating operators and Camelina operations. Camelina also continuously visits farms and explains to farmers about plantation and harvest protocol. During the audit, auditor found that visit to Port facilities were not made and Camelina did not control on their operations regarding to waste management, health and safety issues, and emergency plans. Camelina is not improving training on this participating operator to keep the CoC system. Camelina is always in contact with principal stakeholders and participation and also continuously improving ways to do crop rotations and facilitation to avoid soil erosions. They start working on this last year with INIA Instituto Nacional de Investigación y Tecnología Agraria (www.inia.es/inia/) to work together on some tests to avoid soil erosion by doing soil sampling and several crop rotation strategies. Finally the GHG calculation was not totally provided with objective evidence and they need to get evidence to show the GHG calculation to comply with principle 3 of the RSB principle and criteria standard.

2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks

Type (compliance claim, trademark use)	Description	Findings
RSB logo is used in the web page	The logo on the web comply with standard	compliant
RSB logo used	Power Point Presentations for project ITAKA	compliant

2.6 Stakeholder Consultation Process

In accordance with SCS and RSB protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. The primary purpose of such consultation is to solicit input from affected parties as to the strengths and weaknesses of the Participating Operator’s management system and operations, relative to the standard, and the nature of the interaction between the company and the surrounding communities.

Principal stakeholder groups are identified based upon the certification scope of the participating operator. Stakeholder consultation activities are organized according to the requirements of the RSB. The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

2.6.1 Summary of Stakeholder Comments and Responses from the Team, Where Applicable

Stakeholder Comments	SCS Response
Economic Concerns	
Stakeholders have been contacted by SCS by email.	Regarding the farmers side, the stakeholders are part of governmental institution specifically linked to farm activity so that

During the audit on site, 2 stakeholders have been visited.	economic concern has been positively seen from such stakeholders since producing a crop with useful end-use in an innovative way that could bring added value to the region.
Social Concerns	
Stakeholders have been contacted by SCS by email. During the audit on site, 2 stakeholders have been visited.	Regarding the farmers side, the stakeholders are part of governmental institution specifically linked to farm activity. In this case, the economic concern has been positively seen from such stakeholders since promoting employment of all workers involved in farming activity: camelina as a “cash” crop could cover those periods that were previously characterized by stand-by farming activity.
Environmental Concerns	
Stakeholders have been contacted by SCS by email. During the audit on site, 2 stakeholders have been visited.	. Regarding the farmers side, the stakeholders are part of governmental institution specifically linked to farm activity so that economic concern has been positively seen from such stakeholders since improving conditions of the farmer with a valid alternative in arid regions.

3.0 RISK ASSESSMENT RESULTS

SCS Risk Assessment Results	Deviations from Operator Risk Assessment Results	Risk Factor Difference
Low Risk	No deviation	0

Due to the results of the Risk Assessment, the evaluation did not need to be rescheduled.

4.0 RESULTS OF THE EVALUATION

4.1 Equivalence between the Audit Team Evaluation and the Operator Self Evaluation

Principle/ Subject Area	Summary of Audit Team Findings	Comparison to Operator Self Evaluation (Equivalence)	Added Risk
P1:Legality	Camelina Company España will keep annually updated of all new laws and regulations affecting its activities throughout its value chain activities. Indeed, CCE subcontracts INFOSALD service, specifically dedicated to informing its clients of any new legislation related to its activities. Camelina Company do not provide evidence about hazardous waste management, emergency plans, and	80%	Yes

	health and safety issues for participating operator Demagrisa (port storage and oil delivery).		
P2: Planning, Monitoring & Continuous Improvement	Camelina Company is always monitoring ACESUR, Logigran and most of the farmers , they do take soil samples to check continuously soil conditions, but they didn't monitored Demagrisa.	80%	Yes
P3: Greenhouse Gases	<p>The participating operator maintains documentation of and evidence to support the GHG emissions calculations and the data used in the calculations or provided to external parties. Full documentation for GHG calculations has not been justified. References, yearly data, yield of process, need to be clearly stated to justify the calculated GHG value. This has been classified as minor, because the theoretical calculations have been provided but are not supported by concrete documentation. For example, the plate of engines with nominal power is not enough if hours of processing are not included in the justification.</p> <p>Moreover for ACESUR the report for emission trading has been provided, issued by SGS certification body, but this is associated with the directive for emissions in air and it influences GHG value associated with the product certification.</p> <p>Evidence for justifying numbers still lacks in transparency.</p>	50%	Yes
P4: Human and Labor Rights	<p>In Spain regulation about Human and labor rights is very strict and Camelina is always aware about Workers rights.</p> <p>The monitoring regarding labor laws and regulations affecting CCE value chain is done through specialized companies contracted by CCE. Indeed, CCE has subcontracted the consultancy services of Axioma Tauto, who is in charge of all issues related to labor and tax issues In CCE. Axioma Tauto regularly updates CCE on the new labor regulation that the company needs to comply with.</p>	100%	NO
P5: Rural & Local Development	N/A	N/A	NO
P6: Food Security	N/A	N/A	NO
P7: Conservation	Camelina is using SIGPAC System and also Plantation protocol. Camelina Company España has a robust,	100%	NO

	reliable way through the SIGPAC tool to identify where the camelina plantations are being established by farmers. The land employed is agricultural land in good agricultural and environmental conditions, as defined by the European Commission (EC Regulation No 1782/2003), which means it has been under production at least once every five years.		
P8: Soil	Camelina does follow their soil sampling and planting protocol “Rotation in Dryland Arid Regions”	100%	NO
P9: Water	No water resources employed in the value chain except Crushing facility Water Management Plan/ISO 14001 – Crushing facility	100%	NO
P10: Air	Emissions Management Plan/ISO 14001 – Crushing facility	100%	NO
P11: Technology	Camelina Company España only employs non-GM camelina varieties for the development of its activities along the value chain. CCE employs its US partner (GPOE- Great Plains Oil & Exploration) non-GM camelina varieties for the introduction of camelina in Spain.	100%	NO
P12: Land Rights	Camelina do not purchase or lease lands. Also they use SIGPAC model for land rights. Camelina Company España current business model does not usually involve purchasing or leasing land for the production of camelina oil. However, Spanish real estate regulation guarantees that land use rights in Spain are fully preserved, as sufficient mechanisms to determine land ownership or use disputes are in place, according to national laws and regulations. It is important to stand out that, in any foreseen scenario, CCE will be protected against any claim regarding land use.	100%	NO
FINAL RISK CLASS	Low		

4.2 Process of Determining Compliance

4.2.1 Structure of Standard and Degrees of Non-Compliance

RSB-accredited biofuel standards consist of a three-level hierarchy: principle, the criteria that correspond to that principle, and then the performance indicators that elaborate each criterion. Consistent with SCS Sustainable Biofuels Program evaluation protocols, the team collectively determines whether or not the subject operation is in compliance with every applicable indicator of the relevant

sustainable biofuel standard. Each non-compliance must be evaluated to determine whether it constitutes a major or minor noncompliance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in noncompliance. The team therefore must use their collective judgment to assess each criterion and determine if the Operator is in compliance. If the Operator is determined to be in non-compliance at the criterion level, then at least one of the applicable indicators must be in major non-compliance.

4.2.2 Interpretations of Major and Minor Non-compliances

Major Non-compliances, either alone or in combination with non-compliances of other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant RSB Criterion. These non-compliances must be resolved or closed out before a certificate can be awarded. If Major NCs arise after an operation is certified, the timeframe for correcting these non-compliances is typically no more than three months. Certification is contingent on the certified FME’s response to the NCs within the stipulated time frame.

Minor Non-compliances are typically limited in scale or can be characterized as an unusual lapse in the system. Most minor NCs are the result of a nonconformance at the indicator-level. Non-compliances must be closed out within a specified time period of award of the certificate.

4.2.3 Major Non-compliances

<input checked="" type="checkbox"/>	No major NCs were issued to the Operator during the evaluation. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major NCs were issued to the Operator during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major NCs were issued to the Operator during the evaluation and the Operator has not yet satisfactorily closed all major NCs.

4.2.4 Non-compliances and Current Status

Summary of Non-compliances and Current Status				
NC No.	Type of Non-compliance	Relevant RSB Principle and Criteria	Summary of Finding and Evidence Collected	Status of Non-compliance
1	Minor NC	Principle 3; CoC 3.3.3	GHG calculations have not been justified. References, yearly data, yield of process, need to be clearly stated to justify the calculated GHG value.	Open

2	Minor NC	RSB-STD-11-001-01-001 V2 Criterion 1.a, 4.g	Camelina do not have control on the activities of the port Demagrisa. The umbrella is not properly implemented to control the participating operator.	Open
3	Minor NC	RSB-STD-11-001-01-001 V2 Criterion 4.f.	Records of training were provided by Logigran, ACESUR and also some farmers, but more farmers need to provide information about training. At the last audit this was an observation so in this audit this will be upgraded to a minor NC.	Open
4	Observation	RSB-STD-11-001-20-001- vers.3.1 Indicator 1.4	Camelina personnel do have updated training for RSB and chain of custody however we could not verify CoC training for other facilities.	Open

4.2.5 New Non-compliances

Select one:	<input checked="" type="checkbox"/> New NC(s)	<input type="checkbox"/> No New NC(s)
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5.0 CERTIFICATION DECISION

Certification Recommendation	
Operator be awarded RSB certification subject to the minor non-compliances stated in Section 4.2.5.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Responsible Biofuels Program evaluation protocols. If certification is recommended, the Operator has satisfactorily demonstrated the following without exception:	
Operator has addressed any Major NC(s) assigned during the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Operator has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards are met over the sites and facilities covered by the scope of the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Operator has demonstrated that the described system of management is being implemented consistently over the sites and facilities covered by the scope of the certificate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments and/or details of any issue which was difficult and/or impossible to evaluate:	