

Outline of Communications and Claims Procedure(Type: Mass Balance)

I. Introduction

A communications and claims procedure details how sustainability claims for RSB-compliant and EU RED-compliant biomass, biofuels, bio-chemicals and biomaterials should be made and how RSB trademarks should be used.

This document describes how to write a procedure to make claims for the case where RSB certified material is mixed with other materials using a mass balance chain of custody system.

The sustainability claims mean that relevant articles of the EU RED and EU FQD have been complied with.¹ The European Commission officially recognizes that RSB EU RED certification provides a sufficient proof of compliance with these articles.

This document is not prescriptive and the operator can adapt it to suit their requirements.

However, sufficient information needs be included in the procedure to ensure compliance with the [RSB EU RED Procedure on Communications and Claims](#) and the RSB Participating Operator Agreement. In the case of any contradictions between this note and the RSB Standard, the RSB Standard prevails.

Where a communications and claims procedure relies on information that is kept elsewhere in the company management system then the information can be referred to rather than duplicated in the procedure. Some operators may wish to combine their Claims Procedure with their Chain of Custody Procedure (see Annex for an outline on how to prepare a Chain of Custody Procedure).

II. Outline of Procedure

The main sections of the communications and claims procedure along with recommended content are outlined below.

1. Scope

This section should include the following information:

- Addresses of company sites where RSB material or EU RED compliant material is labeled for dispatch to customers.
- Addresses of company sites where off-product marketing e.g. website, marketing literature is managed.
- Product names and descriptions covered in the RSB scope of certification.

2. Roles and Responsibilities

This section should include:

¹ Articles 17(2), 17(3)(a, b and c), 17(4) and (5), and 18(1) of Directive 2009/28/EC (RED) and Articles 7b(2), 7b(3)(a, b and c), 7b(4) and (5), and 7c(1) of Directive 98/70/EC (FQD) have been complied with.

- Names or roles of company staff responsible for this procedure.
- Names or roles of company staff administering RSB and EU RED complaints concerning claims on products.
- Names or roles of company staff responsible for marketing literature.

3. RSB Logo

This section should include:

- Detail the rules for RSB logo and trademarks size and placement, in the procedure so it is clear to all users of the procedure. For example, that the RSB logo will be just as visible as other logos on product packaging, that there is no intention to imply any relation to any other certification, etc.
- The rules should note that it is not permitted to:
 - Change the proportions of the RSB logo
 - Change or add contents to the RSB logo
 - Make the RSB logo part of other information, such as GHG claims not relevant to RSB certification (e.g. for biomaterials)
 - Place the RSB logo within another border or background
 - Change the shape of the border or background of the RSB logo
 - Rotate the RSB Logo
 - Violate the clear space around the RSB logo
 - Combine the RSB promotional logo with the user's own branding in a way which implies association
 - Place the RSB logo on a strongly patterned background or image or using the RSB logo as a watermark
- Describe where customers can access the RSB participant code and the RSB web address www.rsb.org

4. On-Product Claims

This section should include:

- List of container types that will carry the RSB logo and claims. Refer to procedures for generating product labels and dispatch documentation held elsewhere in the management system.
- List of product literature that will carry the RSB logo and claims e.g. an internet page, a leaflet, a quotation or an invoice.
- The claim "Product mix contains RSB EU RED Compliant Biomass/Biofuel" will be made when the consignment contains RSB certified material.
- If the product mix contains non-EU RED compliant material then one of the following clarification statements should be included:
 - "The equivalent mass of this biomass/biofuel product originated from production operations certified as being in compliance with the EU RED."
 - "This biomass/biofuel product contains a mix of biomass/biofuel products compliant with the EU RED and other biomass/biofuels products, which have not been evaluated

for compliance with the EU RED. The corresponding mass of certified materials has been tracked in the associated documentation.”

5. Off-Product Claims

This section should include:

- List of means of communication where RSB will be referenced e.g. internet, email signature, signs, corporate documents, brochures, leaflets.
- Indicate the optional statement of support for RSB which will be used e.g.
 - “Delivering socially and environmentally responsible Biomass/Biofuels certified by the Roundtable on Sustainable Biomaterials (RSB)”
 - “Sourcing socially and environmentally responsible Biomass/Biofuels certified by the Roundtable on Sustainable Biomaterials (RSB)”
 - “[Name of Company] is proud to be RSB EU RED-certified”

6. GHG Saving Claims

This section describes how to make claims about the GHG savings of your biofuels or biomaterials. For biofuels, the blender should include a % saving based on a GHG intensity provided by upstream providers. These GHG values are passed down the supply chain in the product documentation often called the Proof of Sustainability (PoS). Please note:

- GHG intensities/savings should be included in the Proof of Sustainability.
- EU RED Default or calculated values can be used.
- Where components with different GHG savings are physically mixed to form a consignment, then operators should track the exact GHG value of each part of the consignment separately on the product transfer documentation/PoS. Alternatively, the highest component GHG intensity can be assigned to the whole consignment.
- Operators should indicate whether GHG saving claims will be made other than on the Proof of Sustainability. State whether the following allowable claim will be made:

“Over its production lifecycle, this biofuel provides [x] % greenhouse gas savings compared to a fossil fuel equivalent” ([x] being the exact GHG savings, as calculated above; [y] being the origin of the reference fossil product being replaced by the bio-product.”