

Certification Evaluation Report

Roundtable on Sustainable Biofuels

GreenWood Tree Farm Fund, LP.

SCS Certificate Code-SCS-RSB/PC-0006

GreenWood Resources, Inc., Crown Plaza

1500 SW First Avenue, Suite 1150 Portland, OR 97201

Andrew Rodstrom

<http://www.greenwoodresources.com>

CERTIFIED	EXPIRATION
January 17, 2014	January 16, 2016

DATE OF FIELD AUDIT

September 18, 2013

DATE OF SURVEILLANCE AUDIT

January, 2015

DATE OF LAST UPDATE

February 12 ,2015

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FOREWORD

SCS Global Services(SCS) is a certification body accredited by the Roundtable on Sustainable Biofuels (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 Biofuels. 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 Database of Participating Operators (<http://rsb.org/certification/participating-operators/>). 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	GreenWood Resources, Inc.		
Operator Number	1325		
Contact person	R. Andrew Rodstrom, Crop Protection & Certification Manager		
Address	77200 Poleline Rd, Boardman, OR, 97818	Telephone	971.270.4815
		Fax	541.481.2443
		e-mail	andrew.rodstrom@gwrglobal.com
		Website	http://www.greenwoodresources.com

1.1.2 Additional Parties Involved

Organization name	None		
Contact person			
Address		Telephone	
		Fax	
		e-mail	
		Website	
Nature of Involvement:			

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
<p>Notes: There has been no sales or offsite transport of RSB certified material since initial certification. No changes of supply chain structures or management after January 2014. In 2015 the area of land dedicated to biomass is being increased relative to the area dedicated to timbers but management is similar in most respects.</p>		

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

SITE INFORMATION		
Site Type	<input checked="" type="checkbox"/> Agriculture	<input checked="" type="checkbox"/> Forestry
	<input type="checkbox"/> Other (describe) drop irrigation	

Current Land Use		Prior Land Use			
<input type="checkbox"/> Forestry Production		<input type="checkbox"/> Forestry Production			
<input checked="" type="checkbox"/> Agriculture		<input checked="" type="checkbox"/> Agriculture			
<input type="checkbox"/> Forestry Biomass		<input type="checkbox"/> Forestry Biomass			
<input checked="" type="checkbox"/> Other: drip irrigation		<input type="checkbox"/> Other: used central pivot irrigation			
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			
Owned/Controlled By:		Greenwood Tree Farm Fund			
Location/City:		Boardman, OR			
Geographic location:		Farm/Entity	Location (Lat. – Long.) 229 degrees 32 minute w – 45 degrees, 47 minutes N	Area (See below)	Area Planted (See below)
FORESTRY BIOMASS PRODUCTION SITES					
Total Area (ha)		1901 ha			
Products/Crops Produced					
Product Type		Production Area			
Poplar biomass as chips		951 ha			
INDUSTRIAL SITES					
Input Type		Volume			
Processing– No processing done at industrial sites. All processing (harvesting) is done in the field currently.		None			

INDUSTRIAL FACILITIES			
Name	None		
Type	<input type="checkbox"/> Forestry Biomass Milling and/or Fermentation	<input type="checkbox"/> Vegetable oil Extraction	
	<input type="checkbox"/> Biofuel Production and/or Distribution	<input type="checkbox"/> Storage or Distribution	
	<input type="checkbox"/> Other		
Location/City			
Geographic location		<i>Latitude & Longitude:</i>	
Included in certification scope		Yes <input type="checkbox"/> No <input type="checkbox"/>	
Number of processing steps			

Annual Throughput (Litres)	
Material Input:	
Material Output	
% output yield compared to input material	
Description of Activities:	
Drip irrigated hybrid Poplar plantations at high density produce air-dried biomass for export.	

1.3 Standards Used

1.3.1 Applicable RSB-Accredited Standards

Title	Version	Date of Finalization
RSB-STD-11-001-60-001, RSB Standard for risk management	V3-0;	2014-05-28
Consolidated RSB EU RED Standard for Participating Operators (RSB-STD-11-001-30-001);	2.0	May 2011
GHG Calculation (RSB-STD-01-003-01);	2.0	December 2010
Consolidated RSB EU RED Chain of Custody Requirements (RSB-STD-11-001-20) and associated system operating procedures.	2.0	December 2010
All standards employed are available on the websites of the Roundtable on Sustainable Biofuels (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

Document	Comment
RSB Self Risk Assessment	Updated Version – GW moved to the new risk management standard, January 8 th , 2015
Poplar Bioenergy Feedstock Life Cycle Analysis - Final Report for GreenWood Resources, Portland, OR	Produced by AgRefresh. July 28, 2011
RSB Self-Evaluation, Updated September 17, 2013	
FSC Certificate SCS-FM-COC-0034P Trademark License Code:FSC-C005399	Expiration September 1, 2016
Boardman Tree Farm Management Plant	
Baordman Hybrid Poplar Plantation Mitigation	Annual Report 2013

2.2 Audit Type and Determination

- Initial evaluations following acceptance of the participating operator by the RSB SOE shall always be conducted as field audits.

- Evaluations following an evaluation which did not result in issuing of a valid certificate shall always be conducted as field audits.
- Evaluations following an evaluation which resulted in issuing of a valid certificate to a participating operator in risk class 3, risk class 4, risk class 5 or risk class 6 shall always be conducted as field audits.
- Evaluations following a field audit which resulted in issuing of a valid certificate to a participating operator in risk class 2 may be conducted as a desk audit if this desk audit is concluded within 9 months of the preceding field audit.
- Evaluations following a desk audit which resulted in issuing of a valid certificate to a participating operator in risk class 2 shall be conducted as a field audit if this desk audit is successfully concluded within 9 months of the preceding desk audit and within 18 month of the preceding field audit.
- Evaluations following a field audit which resulted in issuing of a valid certificate to a participating operator in risk class 1 may be conducted as a desk audit if this desk audit is concluded within 12 months of the preceding field audit.
- Evaluations following a desk audit which resulted in issuing of a valid certificate to a participating operator in risk class 1 shall be conducted as a field audit if this desk audit is successfully concluded within 12 months of the preceding desk audit and within 24 months of the preceding field audit.

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 risk class 4, risk class 5 or risk class 6 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:	Michael Keyes	Auditor role:	RSB International Lead Auditor (2013 initial evaluation)
<p>Qualifications: Michael has 25 years of professional experience in the ecology and socioeconomics of agricultural and agroforestry production. SCS uses his unique skills for developing, piloting and perfecting certification programs for agriculture supply chains. Before joining SCS, Dr. Keyes worked for the World Bank’s sustainable agriculture program, and as a university researcher for Chapingo, México, one of Latin America’s most prestigious agricultural universities. From 2004 to 2007 he served as the lead auditor and trainer for the Starbucks Coffee and Farmer Equity (C.A.F.E) Practices program and was heavily involved with standards development and piloting of the standard. For the last 7 years, Dr. Keyes has been the driving force behind launching sustainability programs in agriculture and agro-forestry at SCS. In addition, he has worked to improve production agriculture (cane, ranching, slash-and-burn) in the tropics for 20 years.</p> <p>Michael was among the first international lead auditors trained for the RSB System in 2011 and continues to work in the development of biofuels standard for the Council on Sustainable Biomass Production in the USA.</p> <p>Ph.D., in Production Ecology; University of Washington, Seattle, WA; Master’s Degree in Soils and Production Ecology, University of Washington, Seattle, WA, USA; Bachelor’s Degree in Forestry and Natural and Resources, University of California, Berkeley, CA, USA; Diploma in Agro-forestry, Centro Agronómico Tropical de Investigación e Enseñanza, Turrialba, Costa Rica</p>			
Auditor Name:	Dave Wager	Auditor role:	FSC Annual Surveillance (2013 initial evaluation)
<p>Qualifications: SCS Lead Auditor As previous FM Director for SCS, Dave spent ten years managing and/or leading Forest Stewardship Council (FSC) endorsed certification assessments on more than 100 forest management operations covering over 25 million acres of forestland across 16 countries. As a certification practitioner, Dave Wager has led FSC forest management and chain-of-custody assessments on a range of private and public operations across North America, Asia, and Latin America. In other natural resources work, Dave played a key role in the development of Starbucks CAFE Practices- a program to ensure procurement of sustainably grown and processed coffee. Dave has 16 years experience working in forestry and the environmental field. He has expertise in forest ecology and business (B.S. business, Skidmore College; M.S. Forest Resources, Utah State University). While studying forest ecology at Utah State University, Dave was awarded a NASA Graduate Student Research Fellowship to develop dendrochronological techniques to assess Douglas-fir growth in Utah’s Central Wasatch Mountains.</p>			
Auditor Name:	Jingting Zhou	Auditor role:	Auditor (2015 surveillance audit)
<p>Qualifications: Ms. Zhou is a trained and certified auditor for ISO 9001, FSC, RSB and Bonsucro Chain of Custody. Jingting has a Bachelor’s Degree in Economics from University of International Business and Economics (Beijing, China) and a Master’s Degree in International Affairs from the University of California, San Diego.</p>			

2.4 Evaluation Schedule and Extent of Audit

2.4.1 Determination of Extent of Audit

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	1 managing office Biomass plantations Primary processing facility
Participating Operator Risk Class	Low Risk (new classification after movement to the new standard and confirmed during surveillance)
Disputes or prior Non-compliances	None (The 2 major NCs issued during the 2013 on-site audit were addressed before certification)
Changes in scope since last evaluation	NA
Total number of compliance claims	NA- Currently no customers. No compliance claims have been made.

2.4.2 Evaluation Itinerary and Activities

Date: December 19 th , 2014	
Operation(s)/ sites visited	Activities/ notes
Desk Review	Contacted PO and sent document request
Date: January 8 th , 2015	
Operation(s)/ sites visited	Activities/ notes
Desk Review	Submitted document were reviewed for conformance and any changes since the initial assessment.. Email communications were sent to clarify areas of uncertainty.
Date: January 28 th , 2015	
Operation(s)/ sites visited	Activities/ notes
Desk Review	Finalization of the surveillance audit report

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.

The RSB evaluation was complemented by a FSC annual surveillance audit. Both FSC and RSB auditors conducted in concert to assure the highest level of conformance to the respective standards. Both audits were coordinated with the audit planning and designed to cover all relevant criterion and indicators. In the boardroom auditors collaborated to review both field and stakeholder evidence. The RSB auditor actively participated as an observer to the FSC audit to assure that Greenwood complied to all relevant FSC criterion determined by RSB as fully compliant with RSB Principles & Criteria. In this report SCS is only elaborating on RSB P&C not covered by the operator’s FSC-certification.

2.5.2 Capacity of the participating operator to implement its management systems

The Greenwood Resources management group operates a socially and environmentally responsible forest management program under FSC Forest Management Certification. Staff-members have specific responsibilities and training RSB along with FSC Principles and Criteria and adequate financial resources. The Greenwood management has a demonstrated commitment maintain and improve the functioning of its environmental and social management systems over time to implement RSB standard requirements.

2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks

Type (compliance claim, trademark use)	Description	Findings
NA- there is no use of trademark or compliance claim.	NA	NA

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 and prior FSC certification stakeholder outreach.

Stakeholder consultation activities are organized according to the requirements of the RSB before the initial certification audit. A public notice was sent to stakeholders on August 12st, 2013 to notifying them of the audit and soliciting comments, in compliance with the RSB requirements of a 6 week notification period. 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.

During January 2014 to January 2015, there have been no stakeholder interactions directed at the RSB certified crop. GWR continues its practice to offer free tours to local education groups and select 3rd parties. GWR hosted 42 tours in 2014 of approximately 436 people. Over half of these were for educational groups from the local area. GWR has a system to record stakeholder comments and interactions that GWR may have throughout the year. This system is currently being overhauled as GWR moves to a different computer platform. GWR is hoping this will be in place in the near future.

A Community Advisory Committee meeting was planned for winter 2014, but has been pushed to spring 2015 due to member attendance and other area meetings. This meeting is now anticipated to be held in February or March of 2015.

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

(2013 initial audit findings)

Stakeholder Comments	SCS Response
Economic Concerns	
None raised	NA
Social Concerns	
Socio-economically the biomass plantations may use less manpower than pulp or sawlogs.	The use of both man-power and technology is viewed as neutral or positive when compared to pulp plantations or sawlogs. The biomass plantations are more intensively managed due to the shorter rotation.
Environmental Concerns	
Allegations that GMO poplar is being used on the site.	Both FSC and RSB have conducted their respective investigations and determined that no genetically engineered products are produced by Greenwood. Traditional breeding techniques have been used to develop the 5 specific hybrid-poplar planting materials growing on the sites. Greenwood has its own plant

	geneticists that have participated in developing the <i>Populus tremuloides X Populus nigra</i> and <i>Populus tremuloides X Populus deltoides</i> , <i>Populus deltoides X Populus nigra</i>
Questions regarding the sustainability of biotic communities surrounding the forest biomass production given the lack of biotic diversity and loss of habitat.	The ecosystem productivity is naturally limited by the water availability in this region. With the irrigation water supplied to plantations higher net primary production has been achieved. The biomass production is also a source for insects, soil and land invertebrates and vertebrates. Deer, raptors and small mammal tracks witnessed indicate that the plantations have provided added habitat and diversified the landscape-level biodiversity. Isolated areas where excess irrigation waters seeps provides unusual habitat for turtles, frogs, ducks, among other species uncommonly seen under near desert conditions without irrigation.

3.0 RISK ASSESSMENT RESULTS

SCS Risk Assessment Results	Deviations from Operator Risk Assessment Results	Risk Factor Difference
Low	None An updated risk assessment was submitted to SCS on January 8 th , 2015.	None

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 (2013 initial audit)

Principle/ Subject Area	Summary of Audit Team Findings	Comparison to Operator Self Evaluation (Equivalence)	Added Risk
P1:Legality	Same	100%	No
P2: Planning, Monitoring &	Same	100%	No

Continuous Improvement			
P3: Greenhouse Gases	As of the date, the RSB or UK sanctioned LCA greenhouse gas calculators have not produced results	100%	No
P4: Human and Labor Rights	Same	100%	No
P5: Rural & Local Development	Same	100%	No
P6: Food Security	Same	100%	No
P7: Conservation	Irrigation water draws from the Columbia River and is not considered to be a significant factor to alter the quantity or quality of the source, but does have beneficial environmental effects to the growing sites. Micro-site water accumulations within the plantations are providing additional habitat values.	85%	No
P8: Soil	Same	100%	No
P9: Water	Same	100%	No
P10: Air	Same	100%	No
P11: Technology	Same	100%	No
P12: Land Rights	Same	100%	No
FINAL RISK CLASS	Very Low	± 0.0 risk classes	The risk class is = 1

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 surveillance evaluation. Any minor CARs from previous 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				
Non-compliance Number	Type of Non-compliance	Relevant RSB Principle and Criteria	Summary of Finding	Status of Non-compliance
2013.1	Major NC	Criterion 3b.	Greenwood has not calculated lifecycle GHG emissions using RSB lifecycle methodology or recorded the GHG calculation results.	Closed in 2013
2013.2	Major NC	Criterion 1.1, 1.2, 6.1, and 6.2 (Consolidated RSB EU RED Generic CoC Std)	Greenwood has not demonstrated that compliance with RSB CoC standards for documentation, work instructions and providing unique identification codes for its products sold.	Closed in 2013

2013.3	Major NC	Criterion 3.1, and 4.1 (Consolidated RSB EU RED Generic CoC Std) and Criterion 7.4 (RSB EU RED CoC Identity Preserved model)	The PO has not implemented a system for assessing, documenting and labeling RSB compliant batches for RSB EU RED standard requirements for communications and claims.	Closed in 2013
2013.4	Opportunity for Improvement	Criterion 4.f	Occasional lapses in pesticides storage and handling.	CLOSED at surveillance audit
2013.5	Opportunity for Improvement	Criterion 4.d	Lack of compliant system to encourage gender balance.	CLOSED at surveillance audit

4.2.5 New Non-compliances

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

Certification Recommendation	
Operator shall be awarded RSB certification subject to any minor non-compliance 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:	
No issues.	