

Certification Evaluation Report

Roundtable on Sustainable Biomaterials

Sunchem Biofuel Development South Africa (Sunchem SA)

SCS Certificate Code-SCS-RSB/PC-0016

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Samantha Bartle
www.projectsolaris.co.za

CERTIFIED	EXPIRATION
August 5, 2015	August 4, 2020

DATE OF FIELD AUDIT
April 8-10, 2015
DATE OF LAST UPDATE
August 4, 2016

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Setting the standard for sustainability™

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	Sunchem Biofuel Development South Africa (Sunchem SA)		
Operator Number	1420		
Contact person	Samantha Hampton		
Address	7 Coventry Business Park, 675 Pretoria Main Rd, Midrand, 1685 Johannesburg	Telephone	+27 (011)8050582
		Fax	
		e-mail	sam@sunchem.it
		Website	www.projectsolaris.co.za www.sunchem.it

1.1.2 Additional Parties Involved

* Confidential information. Please see details in Appendix 5.

Oil pressing facility added in stage 2 audit. Updated in June 2016.

1.2 Scope of Certificate

Please choose one:	<input checked="" type="checkbox"/> RSB EU RED	<input type="checkbox"/> RSB Global
The scope assessment agrees with the scope under which the operator applied	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If no, please explain:		
Removed from scope of the audit: Oil extraction facility because not yet decided. Added to the scope of the audit: Storage facility, already in use and not included in the Application form.		

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

SITE INFORMATION			
Site Type	<input checked="" type="checkbox"/> Agriculture	<input type="checkbox"/> Forestry	
	<input type="checkbox"/> Biomass Production	<input type="checkbox"/> Industrial	
Current Land Use		Prior Land Use	
<input checked="" type="checkbox"/> Biomass Production	<input checked="" 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																				
Owned/Controlled By:	1_ Lona Venter Family Trust																				
	2_ Kopano Disabled Primary Cooperative																				
	3_ Terblanche Boerdery																				
	4_ Hercules Malan																				
Location/City:	1_ Springbok Flats-Mokopane, Limpopo Province, South-Africa																				
	2_ Marble Hall, Limpopo Province, South Africa																				
	3_ Marble Hall, Limpopo Province, South Africa																				
	4_ Marble Hall, Limpopo Province, South Africa																				
Geographic location:	<table border="1"> <thead> <tr> <th>Farm/Entity</th> <th>Location (Lat. – Long.)</th> <th>Area (ha)</th> <th>Area Planted (ha)</th> </tr> </thead> <tbody> <tr> <td>1 - LV</td> <td>-24.374, 29.081225</td> <td>1557</td> <td>3</td> </tr> <tr> <td>2 - KO</td> <td>-24.94173,29.3431</td> <td>46.808</td> <td>2.5</td> </tr> <tr> <td>3 - TB</td> <td>-25.02972, 29.33485</td> <td>168.27</td> <td>26</td> </tr> <tr> <td>4 - HM</td> <td>-25.075400, 29.251808</td> <td>240</td> <td>18</td> </tr> </tbody> </table>	Farm/Entity	Location (Lat. – Long.)	Area (ha)	Area Planted (ha)	1 - LV	-24.374, 29.081225	1557	3	2 - KO	-24.94173,29.3431	46.808	2.5	3 - TB	-25.02972, 29.33485	168.27	26	4 - HM	-25.075400, 29.251808	240	18
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AGRICULTURE, FORESTRY OR BIOMASS PRODUCTION SITES																					
Total Area (ha)	2012 ha (minimum risk, criteria covered by other info)																				
Products/Crops Produced																					
Product Type	Production Area (ha)																				
Tobacco "Solaris"	49.5																				
INDUSTRIAL SITES																					
Input Type	Volume																				
NA																					

INDUSTRIAL FACILITIES	
Name	TWOLINE Trading 115 (PTY) LTD
Type	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Biofuel Production and/or Distribution <input checked="" type="checkbox"/> Other: Separating and cleaning seed from harvested material and storage <input type="checkbox"/> Vegetable oil Extraction <input checked="" type="checkbox"/> Storage or Distribution
Location/City	Marble Hall
Geographic location	<i>Latitude & Longitude:</i>
Included in certification scope	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Number of processing steps	1

Annual Throughput	
Material Input:	180 tons biomass (estimation)
Material Output	90 tons of seed (estimation)
% output yield compared to input material	50-55% (estimation)
Description of Activities:	
Storage, seed separation and cleaning	

1.3 Standards Used

1.3.1 Applicable RSB-Accredited Standards

Title	Version	Date of Finalization
RSB Principle & Criteria, RSB-STD-11-001-01-001	2.1	May 2011
RSB Standard for Participating Operators RSB-STD-11-001-30-001	3.1	June 2014
RSB Standard for Traceability of RSB Certified Material (Chain of Custody) RSB-STD-11-001-20-001	3.2	February 2015
RSB GHG Calculation Methodology RSB-STD-01-003-01	2.1	Dec 2012
RSB-PRO-11-001-50-001 – Communication and claims	3.0	July 2014
RSB Risk Management RSB-STD-11-001-60-001	3.1	May 2015
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

Manual of Sustainability (including ESMP)	RSB Umbrella Under SUNCHEM
Stakeholders list	Farmers contracts
Farmers validation record	Water assessment per farmer
GHG inputs and preliminary calculations	Registration of cultivation data
National Legislation	
Documentation submitted in stage 2 audit:	
Chain of custody documents (including delivery notes)	GHG RSB Tool Solaris 2014_15 season
Contracts	Landownership Proof (lease contract)
Machinery, Payslip, Complaint form	Biodiversity
Tshwane General and regions report 2013	Project Solaris Smallholder Farmer Support Project

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	5 years	3 years	2 years
Main audit	Every 5 years	Every 3 years	Every 2 years
Surveillance audit	Annual	Annual	Annual

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:	Marinka Vignali	Auditor role:	Lead 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).

Auditor Name:	Jingting Zhou	Auditor role:	Auditor for phase 2 desk audit
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Qualifications: Ms. Zhou is a specialist in international economics and China having graduated from the University of California at San Diego with a Masters in Pacific International Affairs from the School of International Relations and Pacific Studies. She is an RSB certified auditor and worked for two years managing ISCC certification projects at SCS Global Services. She has a solid background in project management and advanced quantitative and qualitative analytical skills. Additionally, Ms. Zhou completed multicultural training with fluency in Mandarin Chinese (Native) and English and intermediate knowledge of Korean and Spanish.

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	Seed cleaning and storage, 1 facility for oil pressing 4 Farmers, 1 Office, 1 Storage
Participating Operator Risk Class	Low Risk
Disputes or prior Non-compliances	N/A: first audit
Changes in scope since last evaluation	N/A: first audit
Total number of compliance claims	3

2.4.2 Evaluation Itinerary and Activities

Date: April 08, 2015	
Operation(s)/ sites visited	Activities/ notes
Headquarters in Cape Town	Scope of audit confirmation with all partners included, Mass balance & Traceability, Procedures, Farmers validation, ESMP, GHG
Date: April 09, 2015	
Operation(s)/ sites visited	Activities/ notes
Kopano	Farmer assessment, including Water and land ownership. ILO.
TB	Farmer assessment, including Water and land ownership. ILO.
Date: April 10, 2015	
Operation(s)/ sites visited	Activities/ notes
HM	Farmer assessment, including Water and land ownership. ILO.
Sunchem Office at farmers	Review of all farmers data and comparison with Sunchem

location	procedures and validation
Storage	Assessment of the management of physical batches, traceability and mode of registration.
Date: May-June 2016 (Phase 2)	
Operation(s)/ sites visited	Activities/ notes
Desk audit	Documents submission and review

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

Note: include an overall evaluation of the participating operator’s responsiveness and ability to consistently and effectively implement its management system based on the financial, technical and human resources available.

SUNCHEM has put in place a robust management system for oversight of the production processes from seed to processing where the concept of an RSB “umbrella” is fully applied. This means that in all visited sites, the activities are happening in full cooperation and not merely a simple market exchanges. The evidence of the implemented umbrella the constant management with both the Farmers and Sunchem, working together and continuously updating details about cultivation practices. All declarations and pro-active statements included in the ESMP and the Manual of Sustainability have been seriously taken into consideration and implemented at all level of the project.

UPDATE OF 05.05.2015: the outcome of the audit on site had been discussed at a NC closure meeting; most of the missing information which could interfere with the certification has been taken into account. This is a confirmation of the capacity of the staff for the Participating Operator and shows their ability to quickly adapt to the requirements.

UPDATE OF May 2016: Sunchem includes the oil pressing facility under the certification scope. Management system has been updated to reflect the changes and manage the whole chain of custody.

2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks

Type (compliance claim, trademark use)	Description	Findings/Updates
compliance claim in delivery note template	Template not suitable for outgoing batches to customers external to RSB umbrella (e.g. UNIQUE BATCH NUMBER MISSING, GHG emissions missing, Origin missing etc....)	Template has been provided in the Manual of Sustainability. NC has been closed.

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, relation 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 phone during the audit on site.	The new crop offers a valid alternative, without provoking distortion to the current economy.
Social Concerns	
Verified by phone call.	The benefit to the tobacco industry has been foreseen by farmers since they can offer another source for continuous work.
Environmental Concerns	

	The stakeholders are part of governmental institution dealing with environmental programs and they confirm the respect of the land. This was the main concern since from “protected planet” web site, many of the farms were close to wild areas. However it has been clarified that such areas are respected and it is a source additional revenue through of tourism in the region.
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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	Sunchem has all contracts in force with farmers and it has to develop a new contract for the supply chain through oil production. All legal requirements are duly respected.	The participating operator provides objective evidence demonstrating compliance with the applicable national laws and regulations.	0
P2: Planning, Monitoring & Continuous Improvement	Screening tool The ESMP covers in all crucial parts.	No differences with the Self Evaluation.	0
P3: Greenhouse Gases	GHG calculations have been implemented but still actual values are needed, which are not available at this time. However the full transparency and full control on the registered data will guarantee the proper management of this criteria. To be controlled in the next phase	The participating operator maintains documentation and evidence to support the GHG emissions calculations. GHG calculations has been submitted in the phase 2 audit.	0

	of audit (oil mill).		
P4: Human and Labor Rights	The collected legislation has been included in the available Documents. Interview on site confirm the fair behavior of the Umbrella versus workers.	Coherent evidences provided on site	0
P5: Rural & Local Development	N/A	N/A	
P6: Food Security	N/A	N/A	
P7: Conservation	ESMP included in Manual of Sustainability. All lands are checked to verify full compliance with protected areas.	The evidence for verification of all property has been provided	0
P8: Soil	The cultivation Protocol is quite strict and the audit on site has shown that the management is always continuous during the cultivation phase with analysis included.	Compliant to company declarations.	0
P9: Water	Water is managed by a Private Company with fair treatment to all fields in the region. Only one farmer is not irrigating.	Coherent.	0
P10: Air	N/A in this phase of the project.	N/A	
P11: Technology	Regarding the crop, this is a patented tobacco seed, no-nicotine. The cultivation phase has been developed accordingly. Also the steps for drying the harvested crop is in test phase.	The risk is part of this phase where technology has to be tested, so it has been verified that the declared umbrella is coherent with the proposed technology.	0
P12: Land Rights	3 farmers have owned their lands for years. The kopano disabled primary cooperative farmers are new ones but already organized with all contracts in place (land, water-which in this region is strictly related).	Coherent	0
FINAL RISK CLASS	low	low	0

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 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 checked="" type="checkbox"/>	In phase 1 audit: 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. In phase 2 audit: All Major NCs were closed by this time.
<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 and Evidence Collected	Status of Non-compliance
1	Major	RSB-STD-11-001-30-001 – Consolidated RSB EU RED Standard for Operators Taking Part in RSB Certification Systems (Participating Operators)	2 farmers have stored tobacco at a facility are not covered in the current RSB umbrella. The rental agreement for storage service has to be made official with appropriate documentation to include such storage within the scope of the audit representing SUNCHEM RSB umbrella. The organization chart must represent the new configuration with storage included and the appointed representative duly indicated.	Closed
2	Major	RSB-STD-11-001-20-001 - RSB Consolidated RSB EU RED Standard for Traceability of RSB EU RED and EU RED Certified Material (Chain of Custody)	the current procedure for CoC is not compliant with requirements	Closed for current scope (seed cleaning and storage) See more details in Appendix 4 NC No.2
3	Major downgraded to Minor	RSB-STD-01-003-01 - RSB GHG Calculation Methodology	In the Sunchem Procedure it has been declared that GHG have not been provided because tobacco is missing in RSB tool. However, while RSB tool is not mandatory, the threshold of GHG saving has to be provided with any approved tool by European Commission or LCA justified studies.	GHG calculation has been provided. Open as Minor NC and to be checked during next step of certification. GHG Calculation has been updated in phase 2 audit. NC closed.
4	Major downgrade	RSB-PRO-11-001-50-001 – Communication and claims	No template has been provided for the various	Template has been provided.

	d to Minor	[RSB-STD-11-001-20-001 (Version 3.1) F.4.4.2. Specific Requirements for Forwarding RSB EU RED Certified Material or EU RED Certified Material	participating operator to verify the use of the RSB claim and the content of the declaration when forwarding the material. No template has been provided for forwarding documents.	Open as Minor NC and to be checked during next step of certification. Delivery note samples were reviewed in phase 2 audit. NC closed.
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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:	N/A	
To be completed by Certification Decision-Making Entity	Certification decision by:	Neil Mendenhall
	Date of decision: For initial or continued certification	August 4, 2016 – Surveillance and scope expansion to include seed crushing
	Surveillance schedule:	Notes: Recertification audit next year followed by surveillance audit

Sub Certificate Codes (if applicable)

Legal Entity/Operational Site	Sub-Certificate Code
NA	NA