

# Certification Evaluation Report

*Roundtable on Sustainable Biomaterials*

*Manildra Group of Companies*

**SCS Certificate Code- SCS-RSB/PC-0020**

Address 160 Bolong Road, Bomaderry NSW 2540

Client Contact John Studdert

Client Website: [www.manildra.com.au](http://www.manildra.com.au)

CERTIFIED	EXPIRATION
February 29, 2016	February 28, 2021

DATE OF DESK AUDIT
March 6, 2017
DATE OF LAST UPDATE
May 8, 2017

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## FOREWORD

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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 Operator’s 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](http://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 Participating Operators Database (<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	Manildra Group of Companies, Shoalhaven Starches Pty Ltd		
Operator Number	RSB 00001		
Contact person	John Studdert		
Address	16 Bolong Road Bomaderry NSW 2540	Telephone	(02) 44238200
		Fax	(02) 44217760
		e-mail	Wes.davis@manildra.com.au
		Website	www.manildra.com.au

##### 1.1.2 Additional Parties Involved: Not applicable : Not in Scope of Certificate

Please choose one:	<input type="checkbox"/> RSB EU RED	<input checked="" type="checkbox"/> RSB Global
The scope assessment agrees with the scope under which the operator applied	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Scope of certification	Biofuel (ethanol) production from waste starch originating from wheat processing. Under the RSB Certification System, the Participating Operator is defined as a Biofuel Producer.	
If no, please explain:		
<i>Note: If the scope is different, please contact SCS.</i>		

SITE INFORMATION FOR AGRICULTURAL SITES OR FEEDSTOCK PRODUCTION SITES	
Site Type	<input type="checkbox"/> Agriculture <input type="checkbox"/> Forestry
	<input type="checkbox"/> Biomass Production <input checked="" type="checkbox"/> Other: Biofuel Producer
Feedstock Produced:	Not applicable
Current Land Use	Prior Land Use
<input type="checkbox"/> Biomass Production	<input type="checkbox"/> Biomass Production
<input type="checkbox"/> Agriculture	<input 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 type="checkbox"/> Local Average	<input type="checkbox"/> Local Average																
<input checked="" type="checkbox"/> Above Local Average	<input checked="" type="checkbox"/> Above Local Average																
<input type="checkbox"/> Full	<input type="checkbox"/> Full																
<b>Total workers covered by scope of certification:</b>	137																
<b>Owned/Controlled By:</b>	Manildra Group of Companies																
<b>Location/City:</b>	Sydney NSW Australia																
<b>Total farms included in certification scope</b>	Not applicable																
<b>Geographic location:</b>	<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>N/A</td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Farm/Entity	Location (Lat. - Long.)	Area (ha)	Area Planted (ha)	N/A											
	Farm/Entity	Location (Lat. - Long.)	Area (ha)	Area Planted (ha)													
	N/A																
<b>Total Area (ha)</b>	Not applicable																
<b>Total Planted Area (ha)</b>	Not applicable																
<b>Total area set aside for conservation purposes (ha)</b>	Not applicable																
<b>Annual Feedstock Production Volume (please specify unit of measurement)</b>	Not applicable																
<b>Amount sold as RSB certified in last calendar year (tons)</b>	0																

INDUSTRIAL FACILITIES	
<b>Name</b>	Manildra Group of Companies (Shoalhaven Starches Pty Ltd)
<b>Type</b>	<input type="checkbox"/> Agriculture 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 checked="" type="checkbox"/> Other, please explain here: Waste starch from wheat processing.
<b>Location/City</b>	Bolong Road Bomaderry NSW 2540
<b>Geographic location (Latitude &amp; Longitude)</b>	Lat: -34.857150 Long: 150.612519
<b>Number of processing steps</b>	1

## 1.2 Standards Used

### 1.2.1 Applicable RSB-Accredited Standards

Title	Version
RSB Procedure on Communication and Claims (RSB-PRO-50-001 V3.1);	V3.1
RSB Standard for Participating Operators (RSB-STD-30-001 V3.1);	V3.1
RSB GHG Calculation Methodology (RSB-STD-01-003-01 V2.1);	V2.1
RSB Risk Management (RSB-STD-60-001 V3.1)	V3.1
Standard for certification of biofuels based on end of life products by products and residues (RSB-STD-01-010 RSB)	V1.6
All standards employed are available on the websites of the Roundtable on Sustainable Biomaterials ( <a href="http://rsb.org/sustainability/rsb-sustainability-standards/">http://rsb.org/sustainability/rsb-sustainability-standards/</a> ). Standards are also available, upon request, from SCS Global Services ( <a href="http://www.scsglobalservices.com/">http://www.scsglobalservices.com/</a> ).	

## 2.0 EVALUATION PLANNING & PROCESS

### 2.1 Documentation Submitted by Operator

Shoalhaven Starches Pty Ltd - Development Expansion Project Approval Consent 06_0228 Annual Management Plan	Environmental Records Handling Procedure FMEN044
Corrective Action Reports for 036, 058, 048,	Shoalhaven Starches RSB Certification Scope
Stakeholder engagement 2017	Signed PO Agreement 16.12.11
RSB Certification Scope 31.8.16	Screening Exercise 6_0228 Ethanol Upgrade
Shoalhaven starches risk assessment	

### 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 year
Main audit	Every 5 years	Every 3 years	Every 2 year
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 non-compliance 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**

<b>Auditor Name:</b>	Mick Berry	<b>Auditor role:</b>	Lead Auditor
<b>Qualifications:</b> Bachelor Economics / Science (Forestry), RSB Lead Auditor			

**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
Participating Operator Risk Class	Low
Disputes or prior Non-compliances	8
Changes in scope since last evaluation	None
Total number of compliance claims	None

**2.4.2 Evaluation Itinerary and Activities**

<b>Date: 6.12.17</b>	
<b>Operation(s)/ sites visited</b>	<b>Activities/ notes</b>
Desktop Assessment	Review of documentation
<b>Date: 9.12.17</b>	
Desktop Assessment	Review of documentation

## 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.*

Include overall evaluation of management system implementation here or fill in the table in Appendix 2 (the details of the observations and substantiating evidence collected during evaluation of the central management office and management systems of the participating operator)

### 2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks

Type (compliance claim, trademark use)	Description	Findings
No Claims made		

## 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
<b>Economic Concerns</b>	
No stakeholder contact required	
No stakeholder follow-up required	
<b>Social Concerns</b>	
No stakeholder contact required	
<b>Environmental Concerns</b>	
No stakeholder contact required	

**3.0 RISK ASSESSMENT RESULTS**

SCS Risk Assessment Results
Score 7

**4.0 RESULTS OF THE EVALUATION**

**4.1 Process of Determining Compliance**

**4.1.1 Structure of Standard and Degrees of Non-Compliance**

RSB-accredited biofuel standards consist of a three-level hierarchy: the principle, the criteria that correspond to that principle, and then the performance indicators that elaborate upon 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 non-compliance 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 non-compliance. 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.

**4.1.2 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 non-conformance at the indicator-level. Non-compliances must be closed out within a specified time period of award of the certificate.

**4.1.3 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.

**4.1.4 Non-compliances and Current Status**

Instructions:

- Initial certification audit: list all Non-conformities and Opportunities for Improvement issued during this audit.
- Surveillance/Recertification: list status of minor NCs that were not closed in previous audit, then list new NCs/OFIs issued during this audit.

Summary of Non-compliances and Current Status				
Non-compliance Number	Type of Non-compliance	Relevant RSB Standard & Indicator No.	Summary of Finding and Evidence Collected	Status of Non-compliance (Open/Closed)
2015-01	Minor NC	RSB Principles & Criteria RSB-STD-01-001 V2.1  2.b.i.9; 9.b	The Environment and Social Management Plan and Water Savings Action Plans are not publicly available.	Closed
2015-04	Major NC	RSB Principles & Criteria RSB-STD-01-001 V2.1  4.g.	There is currently no mechanisms to ensure that contracted workers are afforded the same labor and rights as employees and in accordance with labor laws.	Closed
2017-1	Minor NC	RSB Standard for Participating Operators RSB-STD-30-001 V3.1  1.9	The PO has not conducted a self-evaluation against the RSB Standards and procedures.	Open

## 5.0 CERTIFICATION DECISION

Certification Recommendation		
Operator to 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:		
To be completed by Certification Decision-Making Entity	<b>Technical Review by:</b> If different to decision-maker	Inna Kitaychik
	<b>Certification decision:</b>	Continued certification
	<b>Certification decision by:</b>	Matthew Rudolf
	<b>Date of decision:</b> For initial or continued certification	5/8/17
	<b>Surveillance schedule:</b>	Surveillance Audit in February 2018
	Notes:	

### Sub Certificate Codes (if applicable)

Legal Entity/Operational Site	Sub-Certificate Code