



**RSB**  
Roundtable on  
Sustainable Biomaterials  
[www.rsb.org](http://www.rsb.org)

## **Reactive Guidance on Traceability for end-of-life products, by-products and residues in the case of back-to-back shipments 20 October 2017**

### **Interpretation Request**

The RSB Standard for end-of-life products, by-products and residues (RSB-STD-01-010) requires compliance with the RSB chain of custody standard from the first collector onward and specifies documents to be available for verification.

RSB-PRO-70-001 requires auditors to audit a sample of points of origin and first collectors delivering more than 10 metric tons per month in order to check the plausibility of the mass balance records and the conformity of the requirements of RSB-STD-01-010.

As an alternative to an on-site audit, RSB-PRO-70-001 specifies documents in order to conduct audits desk-based.

In the case of direct deliveries (back-to-back shipments) from points of origin to the participating operator are there alternatives to an on-site audit of first collectors and points of origin and are alternative evidence documents eligible in the case that the documents specified in RSB-PRO-70-001 and RSB-STD-01-010 (i.e. quarterly production records, mass balance records) are not available?

### **Reactive Guidance (not applicable to RSB EU RED certifications)**

The intention of the RSB standard is to establish traceability from the point of origin onwards. Operators collecting material from the point of origin (first collectors) are therefore required to comply with the RSB Chain of Custody Standard (RSB-STD-20-001).

In the case that a first collector is delivering material directly from the point of origin to the participating operator which can be a trader or processor (back-to-back-order), the following requirements may be applied to verify compliance with RSB-STD-20-001 and RSB-STD-01-010 H.1.2.:

- a) The first collector shall not mix material with material of another category (as per RSB-STD-01-010, Annex I)
- b) The first collector shall ensure that shipments are not mixed with any substance other than what is indicated on the bill of lading
- c) The first collector shall provide delivery documents (weighbridge documents, delivery notes) that establish the traceability between the point of origin and the participating operator and include all information as required by RSB-STD-20-001, Annex I as follows:
  - Description of material, including technical specification
  - Quantity
  - Date of delivery
  - Name and address of the point of origin
  - Name and address of the supplier (first collector)

*Please note:* The first collector may submit any additional documents that are necessary to verify compliance with a)-c) directly to the auditor.



**RSB**  
Roundtable on  
Sustainable Biomaterials  
[www.rsb.org](http://www.rsb.org)

For the compliance with RSB-STD-01-010, G “Eligibility”, participating operators shall maintain a list with all points of origin that they receive deliveries from, together with a signed declaration (“self-declaration”) from the points of origin confirming the following:

- the type of industrial facility they are operating, and
- the material category that is produced as a by-product (or residue) stream and delivered to the Participating Operator.

In addition to a verification of the above, auditors shall include the following in their audit:

A verification of the content of the points` of origin self-declaration, by assessing operators` or public records about installed capacity and operation figures as well as data about estimated conversion factors (from the technical literature, if actual data is not available). References shall be duly recorded in the audit checklist.

*Please note:* If neither documentation by the operators nor public records are available to the auditors, the eligibility of the material under RSB-STD-01-010 cannot be verified. It is therefore recommended that the Participating Operator includes a commitment of the Point of Origin in the self-declaration to provide the necessary records to the auditors and/or allow auditors access to the facility to conduct an on-site audit.

In the event that any feedstock specific requirements are defined in RSB-STD-01-010, documents demonstrating compliance with these requirements shall be provided to the auditors in addition.