

# Certification Evaluation Report

*Roundtable on Sustainable Biomaterials*  
RSB Global

*Manildra Group of Companies (Shoalhaven Starches Pty Ltd)*

**SCS Certificate Code-SCS-RSB/PC-0022**

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(S) OF AUDIT
February 11-13, 2019
DATE OF LAST UPDATE
June 4, 2019

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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	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	John.studdert@manildra.com.au
		Website	www.manildra.com.au

#### 1.2 Scope of Certificate

Please select one:	<input type="checkbox"/> RSB EU RED	<input checked="" type="checkbox"/> RSB Global
Please select boxes that apply: Note: The first surveillance was conducted 2 years after re-certification in 2017 under previous RSB certification system. This audit is therefore recorded as the 3rd annual surveillance audit in the usual cycle.	<input type="checkbox"/> Pre-assessment <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Re-certification <input type="checkbox"/> Follow-Up to NCs	<input type="checkbox"/> 1st Annual Surveillance <input type="checkbox"/> 2nd Annual Surveillance <input checked="" type="checkbox"/> 3rd Annual Surveillance <input type="checkbox"/> 4th Annual Surveillance
Scope (as should appear/appears) on certificate:	<p><b>Bioethanol production inclusive of fuel, industrial, beverage, food and pharmaceutical grades of ethanol from waste starch originating from wheat processing.</b></p> <p><b>Under the RSB Certification System, the Participating Operator is defines as a Biofuel Producer.</b></p>	
The scope assessment agrees with the scope under which the operator applied	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If no, please explain:		
<p><i>Note 1: If the scope is different, please contact SCS.</i></p> <p><i>Note 2: Where the client uses external organizations (public or private) to provide utilities services, such as electricity, waste disposal, water, the auditor shall check that these organizations are run according to local requirements (i.e. the law) but these organizations will not be considered in scope of the audit. Therefore no on-site visits to these utility services are required.</i></p>		

<b>Total workers covered by scope of certification:</b>	137
<b>Number of women workers</b>	43

INDUSTRIAL FACILITIES	
<b>Name</b>	Shoalhaven Starches Pty Ltd
<b>Type</b>	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Vegetable oil Extraction <input checked="" type="checkbox"/> Biofuel Production and/or Distribution <input type="checkbox"/> Other, please explain here:
<b>Location/City</b>	Bolong Road Bomaderry NSW 2540
<b>Geographic location (<i>Latitude &amp; Longitude</i>)</b>	Lat: -34.857150 Long: 150.612519
<b>Start date of operations (initial start date)</b>	2011
<b>Number of processing steps</b>	1

### 1.3 GHG Intensity

<b>For Biofuels Producers: Please state the GHG emissions occurring at the operator's sites in g CO<sub>2</sub>eq/dry-ton for raw materials and intermediary products and g CO<sub>2</sub>eq/MJ for final biofuels (annualized, after allocation) and if applicable, achieved emission savings, and if applicable, explanation for deviation from typical GHG values</b>			
<b>Raw Material:</b>	Industrial Wastewater / Waste Product	<b>GHG:</b>	0 g CO <sub>2</sub> eq/ dry ton raw material
<b>Final Biofuel:</b>	Bioethanol	<b>GHG:</b>	33.41 g CO <sub>2</sub> eq/ MJ
Reduction achieved over fossil fuel baseline is 62.9%			
GHG value is calculated exclusively for the ethanol produced from waste starch.			

### 1.4 Standards Used

Title	Version
RSB-STD-01-001- RSB Principles & Criteria	3.0
RSB-STD-60-001- RSB Standard for risk management	3.1
RSB-PRO-50-001- RSB Procedure on communications and claims	3.1
RSB-STD-30-001- RSB Standard for Operators taking part in RSB Certification Systems (Participating Operators)	3.1
RSB-STD-01-003-01 V2.1- RSB GHG Calculation Methodology	2.3
RSB-STD-01-010- RSB Standard for Advanced Fuels	2.0
RSB-STD-20-001- RSB Standard for traceability of RSB Material (Chain of Custody)	3.1

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

RSB-SYS-0013 Participating Operator procedure	RSB-Certification-Self-Risk-Assessment-Form 2018
RSB Terms and conditions for Participating Operators (PO); Amendment to Agreement dated 13 Jan 2014; Amendment to Agreement dated 12 June 2018	RSB GHG Calc FY 2018
Self-evaluation 2019	Production Statistics 2017-2018

### 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, Bachelor 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	1
Changes in scope since last evaluation	No
Total number of compliance claims	Nil

### 2.4.2 Evaluation Itinerary and Activities

Time	Element/Activity	Personnel Involved
Day 1 - Mon 11 Feb 2019	Onsite assessment at Shoalhaven Starches, Bolong Road Boomaderry, NSW, Australia	
9:00-10:00	Opening meeting with site management to discuss <ul style="list-style-type: none"> <li>- Proposed itinerary</li> <li>- Confirm roles, responsibilities and processes.</li> <li>- Confirmation of scope of certification including product claims</li> <li>- Changes to RSB Certification system including supply chain (if applicable).</li> <li>- Discuss changes to production process and/ or overall process flow.</li> <li>- Update on change to social or environmental aspects including complaints and breaches of legal requirements.</li> <li>- Follow up on implementation of any corrective action plans from previous audit and improvements.</li> </ul>	Management



10:00-12:30	<ul style="list-style-type: none"> <li>- Updated self-risk assessment and results of self-evaluation i.e. completed checklist against P&amp;C;</li> <li>- <b>Review completed RSB checklist for all RSB standards within scope of certification.</b></li> </ul>	RSB Management Representative
12:30	<b>Lunch</b>	
13:00-17:00	<ul style="list-style-type: none"> <li>- Review scope of certification (e.g. sites, products, processes, feedstocks);</li> <li>- Review of the operator`s training system and records;</li> <li>- Records of the operator`s complaint management system;</li> <li>- Contracts with all operators within the scope of certification;</li> <li>- GHG calculation, including a list of input data and a description how they are collected, emission factors.</li> </ul>	CFO – SS RSB Management Representative Training Manager
Day 2 - Tues 12 Feb 2019	Onsite assessment at Shoalhaven Starches, Bolong Road Boomaderry, NSW, Australia	
8:00-12:30	<p><b>Review of Chain of Custody Claim system including:</b></p> <ul style="list-style-type: none"> <li>- Review COC procedures and process including on-product claims (if applicable)</li> <li>- requirements for handling certified material – for applicable COC system Identify preserved, Product Segregation, Mass Balance (refer Section 8.1 of Checklist)</li> <li>- Communication and Claims (refer Section 11.0 of checklist)</li> </ul> <p><b>Starch Plant</b></p> <ul style="list-style-type: none"> <li>- Review manufacturing process, quality control procedures</li> <li>- Confirmation that material qualifies as an end of life product</li> </ul> <p><b>Ethanol Plant</b></p> <ul style="list-style-type: none"> <li>- <b>Review manufacturing process, quality control procedures</b></li> </ul>	
13:00-14:00	Review dispatch and logistics process in relation to communication of claims (if applicable)	
14:00-15:00	<b>Follow-up on any outstanding issues</b>	
15:00-15:30	<b>Review findings and prepare for closing meeting</b>	

<p>15:30 – 16:00</p>	<p><b>Closing Meeting</b></p> <ul style="list-style-type: none"> <li>– Presentation of General audit finding</li> <li>– Presentation of all non-compliances and opportunities for improvement</li> <li>– Fix timetables for corrective actions</li> <li>– Reiterate SCS appeal policy</li> <li>– Ask for questions</li> </ul>	<p>Management</p>
<p>Day 3 Wed 13 Feb 2019</p>	<p><b>Report writing offsite – 8 hours</b> <b>Planning / Report consolidation – 4 hours</b></p>	

## 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.

This is a desktop assessment. Review of documentation and records remotely was undertaken with contact by phone and email.

### 2.5.2 Capacity of the participating operator to implement its management systems

Shoalhaven Starches Pty Ltd continues to implement an RSB Certification system that ensures consistent compliance with the requirements of the RSB standards. There are also sufficient financial, technical, and human resources to maintain and implement RSB certification requirements.

Shoalhaven personnel continue maintain relevant qualification and competencies to effectively implement RSB Certification Systems and RSB standards.

This assessment includes an extension to scope to include the Chain of Custody system implemented using the Mass Balance tracking model and claims. The non-conformances identified as part of this assessment primarily relate to the requirements of the RSB-STD-20-001-vers.3.1 RSB Standard for Traceability of RSB Certified Material (Chain of Custody).

A corrective action plan is required by completing the SCS Global Corrective Action Plan checklist. Attached.

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

<b>The RSB short claim, as defined in RSB-PRO-50-001</b>	Short claim to be: “Product mix contains Roundtable on Sustainable Biomaterial (RSB) compliant material” However no claims yet made
<b>Any other claims used as per RSB-PRO-50-001</b>	No other claims made
<b>Does Operator use RSB trademarks on off-product or on-product claims?</b>	No RSB claims made

**3.0 RISK ASSESSMENT RESULTS**

Based on the most recent self-risk assessment (no older than 3 months from the audit date) the PO’s risk assessment results are:	Corresponding risk class (low, medium, high):	Auditor’s assessment of Operator’s risk
4	Low	Confirms score in self-risk assessment done by Operator

**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 operator’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 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"/>	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

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)
2019-01	MINOR	PO Checklist 1.5 (RSB-STD-20-001 Clause 1.5)	The COC system does not include processes and systems to support on product claims. (Minor as PO does not intend to make on-product claims)  Update: Operator has provided has updated their procedure and created a mechanism in Certificate of Analysis (C of A) database for ethanol (fuel grade) products to automatically display required RSB product-related claims.	Due by 5 February 2020  Closed
2019-02	MAJOR	PO Checklist 2.1.2 (Clause 1.4 RSB-RSB-STD-20-001-vers.3.1)	Employees have not been appropriately trained in relation to the recently introduced Chain of Custody system.  Update:	Due by 13 May 2019  Closed

			<p>Training record for 3/5/19 submitted.</p> <p>Staff members were interviewed to review effectiveness of training. Staff knew their roles and how the RSB data was managed in the system.</p>	
2019-03	MAJOR	PO Checklist 6.3.2. (RSB-STD-20-001-Annex 1A)	<p>The following information is listed on product claim documentation including:</p> <ul style="list-style-type: none"> <li>- Country of origin is listed on the Certificate of Analysis (CofA) but not Delivery document</li> <li>- Quantity of certified material</li> </ul> <p>However, the following information is missing:</p> <ul style="list-style-type: none"> <li>- Short Claim not described on delivery docket</li> <li>- No Batch No.</li> <li>- No valid RSB Certificate number, Certification Body and Chain of custody model employed</li> <li>- no RSB Short claim (see RSB-PRO-50-001)</li> <li>- no Greenhouse Gas Intensity</li> <li>- Statement whether the GHG value contains transport emissions. If not, transport type and transport distance (in km)</li> </ul> <p>Update: C of A and Delivery document updated to include all required information.</p>	<p>Due by 13 May 2019</p> <p>Closed</p>
2019-04	MINOR	PO Checklist 8.3.7- 8.3.9 (RSB STD 20-001 Clause 3.4.9)	<p>The process for applying Fixed or Continuous accounting is not evident. Refer clause 3.4.9 of RSB STD 20-001</p> <p>Update: Operator updated procedure to include additional information on accounting system used.</p>	<p>Due by 5 February 2020</p> <p>Closed</p>
2019-05	MINOR	PO Checklist 1.4 (RSB-STD-30-001 Clause 1.3)	<p>The written certification scope does not include a written description of the Chain of Custody Tracking Model being Mass Balance.</p> <p>Update: Operator updated SS RSB-SYS-0013 Participating Operator procedure to include a written description of the Chain of Custody Tracking Model being Mass Balance.</p>	<p>Due by 5 February 2020</p> <p>Closed</p>
2019-06	MAJOR	PO Checklist 6.3.2. and 6.3.4 (RSB-STD-20-001 Annex 1B)	<p>SS as a biofuel producer is required in addition to the requirements listed in Appendix 1A to report the following to its customer:</p> <ul style="list-style-type: none"> <li>- GHG emissions value in g CO2 equivalent/MJ</li> <li>- Fossil fuel comparator in g CO2 eq/MJ (dependent on end use)</li> <li>- The GHG emissions savings (%)</li> </ul> <p>Update: Template and procedure updated to ensure inclusion of this information in sustainability declarations. (Section 4.3)"</p>	<p>Due by 13 May 2019</p> <p>Closed</p>

## 5.0 CERTIFICATION DECISION

Certification Recommendation		
<b>For Initial and Re-certifications: Operator to be awarded RSB certification subject to the minor non-compliances stated in Section 4.2.5.</b>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
<b>For Surveillance Audits: Operator is to continue as an RSB certified Participating Operator subject to the minor non-compliances stated in Section 4.2.5.</b>	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"/> No Major NCs issued <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:	Nil	
<b>To be completed by Certification Decision-Making Entity</b>	<b>Technical Review by:</b> If different to decision-maker	Inna Kitaychik
	<b>Certification decision:</b>	Continued certification against the RSB
	<b>Certification decision by:</b>	 Matthew Rudolf
	<b>Date of decision:</b> For initial or continued certification	5 June 2019
	<b>Surveillance schedule:</b>	4 <sup>th</sup> surveillance audit in February 2020
Notes:		

**Sub Certificate Codes (if applicable)**

Legal Entity/Operational Site	Sub-Certificate Code
Nil	