

Certification Evaluation Report

*Roundtable on Sustainable Biomaterials
RSB EU*

Agrisoma Biosciences Inc.

SCS Certificate Code: SCS-RSB/PC-0026

Suite 300, 200 Rue Montcalm
Gatineau, QC, J8Y 3B5 Canada
Glenn Johnston
<http://www.agrisoma.com/>

CERTIFIED	EXPIRATION
16 November 2016	15 November 2021

DATE(S) OF AUDIT
21-23 August 2018
DATE OF LAST UPDATE
21 June 2019

SCS Contact:

Matthew Rudolf | Manager, Biofuels
+1.919.533.4886 (direct) mrudolf@scsglobalservices.com

SCS global
SERVICES

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 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.

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.

CONTENTS

SECTION A – PUBLIC SUMMARY	4
1.0 GENERAL INFORMATION	4
1.1 Operator Information	4
1.1.1 Name and Contact Information	4
1.2 Scope of Certificate.....	4
1.3 Standards Used	6
1.3.1 Applicable RSB-Accredited Standards.....	6
2.0 EVALUATION PLANNING & PROCESS.....	6
2.1 Documentation Submitted by Operator	6
2.2 Audit Type and Determination	7
2.3 Audit Team.....	7
2.3.1 Determination of Audit Team	7
2.3.2 Audit Team.....	7
2.4 Evaluation Schedule and Extent of Audit.....	8
2.4.1 Determination of Extent of Audit	8
2.4.2 Evaluation Itinerary and Activities	8
2.5 Evaluation of Management System	8
2.5.1 Methodology and Strategies Employed.....	8
2.5.2 Capacity of the participating operator to implement its management systems.....	9
2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks	10
3.0 RISK ASSESSMENT RESULTS	10
4.0 RESULTS OF THE EVALUATION	10
4.1 Process of Determining Compliance.....	10
4.1.1 Structure of Standard and Degrees of Non-Compliance	10
4.1.2 Interpretations of Findings	11
4.1.3 Major Non-compliances.....	11
4.1.4 Non-compliances and Current Status	11
5.0 CERTIFICATION DECISION	14

SECTION A – PUBLIC SUMMARY

1.0 GENERAL INFORMATION

1.1 Operator Information

1.1.1 Name and Contact Information

Organization name	Agrisoma Biosciences Inc.		
Operator Number	9239		
Contact person	Glenn Johnston		
Address	Suite 300	Telephone	+1-720-428-2488
	200 Rue Montcalm	Fax	+1-819-205-9675
	Gatineau, QC, J8Y 3B5	e-mail	gjohnston@agrisoma.com
	Canada	Website	agrisoma.com

1.2 Scope of Certificate

Please select one:	<input checked="" type="checkbox"/> RSB EU RED	<input type="checkbox"/> RSB Global
Please select boxes that apply:	<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 checked="" type="checkbox"/> 2nd Annual Surveillance <input type="checkbox"/> 3rd Annual Surveillance <input type="checkbox"/> 4th Annual Surveillance
Scope as it appears on certificate:	Cultivation and Storage of Brassica carinata seeds	
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:		
<i>Note: If the scope is different, please contact SCS.</i>		
Total workers covered by scope of certification:	46	
Number of women workers	Information not available	

AGRICULTURAL SITES OR FEEDSTOCK PRODUCTION SITES	
Site Type	<input checked="" type="checkbox"/> Agriculture <input type="checkbox"/> Forestry
	<input type="checkbox"/> Biomass Production <input type="checkbox"/> Other:
Feedstock Produced:	Brassica Carinata
Current Land Use	Prior Land Use
<input type="checkbox"/> Biomass Production	<input 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 type="checkbox"/> Local Average	<input type="checkbox"/> Local Average
<input type="checkbox"/> Above Local Average	<input type="checkbox"/> Above Local Average
<input checked="" type="checkbox"/> Full	<input checked="" type="checkbox"/> Full
Owned/Controlled By:	Family Farms
Location/City:	Farms in production: Alabama, Georgia, Florida
Total number of farms included in certification scope	21 in scope, with 9 in active operation for the 2017-2018 season *Details of farms are in the Appendix; not available for public summary
Total Area (ha)	(not provided)
Total Planted Area (ha)	925
Total area set aside for conservation purposes (ha)	0
Annual Feedstock Production Volume	1,369.5 MT
Amount sold as RSB certified in last calendar year (tons)	1,240 MT

WAREHOUSES (if in scope)	
1. Name	Amkin Bainbridge (AgroCrush)
Location/City	1501 Colquitt Hwy, Bainbridge, GA, USA
Geographic location (Latitude & Longitude)	30.983867, -84.616781
Material stored:	Brassica Carinata
2. Name	Agrowstar, LLC
Location/City	12389 Ga. HWY 24 East, USA
Geographic location (Latitude & Longitude)	32.7326, -97.0647
Material stored:	Brassica Carinata
2. Name	Agrex, Inc.
Location/City	300 State Dock Road, Montgomery, AL, USA
Geographic location (Latitude & Longitude)	32.41843, -86.3062
Material stored:	
<i>Add more lines as you see fit</i>	

1.3 Standards Used

1.3.1 Applicable RSB-Accredited Standards

Title	Version
RSB-STD-01-001, RSB Principles & Criteria	3.0
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)	3.5
RSB-STD-11-001-30-001, EU RED Participating Operators	3.2
RSB-STD-11-001-60-001, EU RED Standard for Risk Management	3.2
RSB-PRO-11-001-50-001, Consolidated RSB EU RED Procedure on Communications and Claims	3.3
RSB-STD-11-001, Standard for EU Market Access	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 Application	RSB Screening Tool
RSB Questionnaire for Self-Risk Assessment	Environmental and Social Management Plan (August 2018)
Agrisoma Procedures on Communications and Claims	Warehouse mass balance
Carinata Product Transfer Information (template)	Grain Handling Agreement (template)
Carinata Production Contract (template)	Updated Agrisoma Chain of Custody procedures
Brassica carinata Field Survey Report (template)	SOP (RMP) B. carinata Planter/Seeder, Combine, and Seed Transfer Equipment
Agrisoma 2017-18 SE USA Carinata Management Handbook	Agrisoma Employee Handbook
Lease Agreement, Amkin (handler)	Guy Goodson Farms Contract, Production Report, Survey and Load ticket
Farmer Survey Database	Agrisoma organizational chart
Agrisoma Management Systems (October 2018)	Agrisoma RSB Compliance Review 2017-18
Agrisoma Water Management Plan	Agrisoma Air Management Plan 2018
Regional GHG Emissions from Cultivation of Canola for use as biofuel or bioliquid	Colorado State University Estimating Farm Fuel Requirements
Non-GMO Project Verification Certificate #C-181423-2018	Updated RSB Farm List.xls (12 Feb 2019)

Summary of Relevant Laws and Required Permits 2018	Georgia Department of Agriculture Fuels and Measures Device Detail for AGROWSTAR, Oct 10, 2017.
Agrex Grain Handling Agreement April 2018	Turner Scale Inc Certification of Inspection for Agrex, Inc. 21 June 2018
AgrowStar Grain Handling Agreement April, 2018	Grain Silo Lease Amkin, May 2017

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

Auditor Name:	Robert Earley	Auditor role:	Lead Auditor (International)
Qualifications: Robert is an auditor of RSB and ISCC certifications and has been trained in ISO 9001:2015 auditing. Additionally, he is currently an expert consultant on UN, EU, charitable			

foundation and NGO projects focused on sustainable transportation and air pollution. Prior to becoming a consultant, Robert was the Transport Program Manager of Manila-based Clean Air Asia, promoting clean and efficient freight and logistics across Asia, and before that was the Director of the Clean Transportation Program at the Innovation Center for Energy and Transportation (iCET), which developed standards for lifecycle GHG emissions assessment for biofuels in China, and which became the first member of the RSB in China. He is currently on the board of the Beijing Energy Network as well as the China Carbon Forum. Mr. Earley, who has lived in China since 2005 and is fluent in Mandarin Chinese, studied environmental science at the University of Calgary and Urban and Regional Planning at the University of Waterloo in Canada. His coursework at the University of Calgary included impacts of agriculture and conservation in agricultural areas in southern Alberta.

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 head office, 3 grain elevators, 33 contracted growers of Brassica Carinata seeds
Participating Operator Risk Class	Low
Disputes or prior Non-compliances	None
Changes in scope since last evaluation	None
Total number of compliance claims	None

2.4.2 Evaluation Itinerary and Activities

Date: 21 August 2018 (Scope Expansion)	
Operation(s)/ sites visited	Activities/ notes
Head Office by telephone	Opening meeting Check list run-through Closing Meeting
Date: 19 October 2018 (Warehouse)	
Operation(s)/ sites visited	Activities/ notes
Head Office by telephone	Opening meeting Check list run-through Closing Meeting

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

The auditor received documentation regarding growers of *Brassica carinata* that were contracted during the year leading up to the audit, as well as the grain handlers in Georgia which was used to store grain over the period to understand the participating operator's management systems and collect information about conformity with relevant RSB EU RED standards. As this was a desk audit, no field visits were undertaken. The auditor found that documentation suggests the management system and practices are consistent with RSB requirements and conform to the contractual requirements defined by Agrisoma Biosciences, Inc.

The Agrisoma Biosciences management system was assessed and found to be appropriate for operations performed at headquarters. Company policies are described in the Employee Handbook. The document provides employees with a brief summary of Agrisoma's operating policies, guidelines and standards. Employees are directed to contact their supervisor for additional information when required. Policies and expectations for conformity with RSB standards are communicated to growers in a "Carinata Production Contract". Requirements for grain handlers are communicated in a separate "Grain Handling Agreement".

The Agrisoma employee handbook contains information on employee relations and conduct, employee practices and benefits, and safety and security policies. In particular, the employee handbook contains the following information:

- Confidentiality: Any communication of confidential information outside the company requires prior approval of management and/or confidential agreements may be required.
- Conflict resolution: Agrisoma has a dispute resolution process for investigating, documenting and recommending solutions in dispute situations.
- Safety: Agrisoma follows the National Research Council guidelines for safety. All accidents and injuries at work, no matter how minor, must be reported to the Supervisor. Agrisoma has dedicated First Aide Attendants on site.

- Emergency policies: Agrisoma follows the emergency and biohazardous procedures set out by the safety committee of the National Research Council Plant Biotechnology Institute.

Agrisoma is managed by seed and transportation industry veterans. Executive leadership is comprised of a CEO/ President, five vice presidents, and one department director. Top management reports to a board of directors.

2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks

The RSB short claim, as defined in RSB-PRO-11-001-50-001	This lot/batch of biomaterial is certified as being in compliance with RSB standards
Any other claims used as per RSB-PRO-50-001	No RSB compliance claims made
Does Operator use RSB trademarks on off-product or on-product claims?	No RSB compliance 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
1	Low	Low

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 Findings

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.

Opportunity for Improvement is an observation made which does not fully impact compliance but could potentially affect the PO’s ability to comply with RSB requirements in the future.

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.

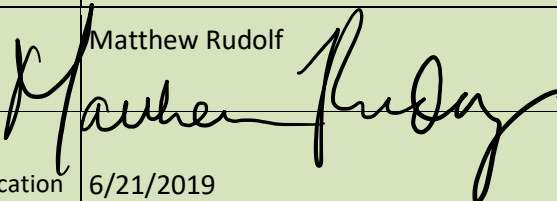
4.1.4 Non-compliances and Current Status

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)
2018-1	minor	P & C 2.c.1.1	No grievances found. However, a description of a grievance mechanism for directly affected local communities was not found in documentation provided by Agrisoma. Update: Agrisoma provided the following documents to the auditor: Agrisoma management plan with updated grievances.	Closed

			Grower handbook with contact information.	
2018-2	minor	P & C 4.h.1	<p>There is no documented process for contracted growers, but contracts note that the agreement is mutual, and that the grower wishes to grow the commercial crop.</p> <p>Update: Agrisoma provided the following documents to the auditor: Agrisoma management plan with updated grievances. Grower handbook with contact information.</p>	Closed
2018-3	minor	P&C 11.d.4	<p>Records of pesticide use are kept through farmer surveys, including the name of the product, etc. however, the justification, date and number of applications are not requested in the form.</p> <p>Update: the dates, number and justification of use are all now listed in the farmer survey database provided to the auditor.</p>	Closed
2018-4	OFI	PO Checklist 1.3	<p>The organization has Non-GMO verified status from SCS Global, and a certificate is available, but not listed in any documentation. Otherwise, it seems that only RSB in place at this time, no other public claims made. No consultants seem to have been appointed, no certificates withdrawn, suspended or terminated based on RSB website.</p> <p>Update: Non-GMO verified status listed in an appropriate place within your management documents</p>	Closed
2018-5	OFI	PO Checklist 12.2	<p>RSB Member trademark has been used for a brochure, but not the RSB certification trademark. Note that use of RSB Member trademark may imply that company is uncertified, which is not the case.</p> <p>Update: Agrisoma used the trademark in geographic regions that are not certified under RSB. Therefore, when</p>	Closed

			giving a broad presentation, Agrisoma will use the membership logo as using the certification logo would misrepresent the current status and scope of RSB certification for Agrisoma.	
2018-6	Minor	RSB Requirement	Shapefiles for new farms not provided	Open Due at next surveillance audit
2019-1	Minor	PO Checklist 6.2.3	<p>Records are missing from the warehouse mass balance or have been transcribed incorrectly from tickets resulting in numerical inconsistencies.</p> <p>OFI as production was 2% different; not materially large, but it is unaccounted for in the accounting documents though conversation with PO indicates that this might be due to shrinkage.</p> <p>Data is not presented in metric tons causing confusion during assessment; unit of volume is not clearly indicated on records further causing confusion.</p>	Open Due at next surveillance audit

5.0 CERTIFICATION DECISION

Certification Recommendation		
For Initial and Re-certifications: Operator to be awarded RSB certification subject to the minor non-compliances stated in Section 4.2.5.	Yes <input type="checkbox"/> No <input type="checkbox"/>	
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.	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 type="checkbox"/> No <input type="checkbox"/> No Major NCs issued <input checked="" 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	Technical Review by: If different to decision-maker	Inna Kitaychik
	Certification decision:	Continued certification against the standards listed in 3.1
	Certification decision by:	Matthew Rudolf 
	Date of decision: For initial or continued certification	6/21/2019
	Surveillance schedule:	3 rd surveillance audit by August 2019 Notes: All future scope expansion will be done in conjunction with surveillance audits to optimize efficiency Sharefile will be used to store documents in the cloud going forward. Therefore, any documents shared with the auditor will be available to SCS as well. This will also increase efficiency if follow-up analysis is needed.