



## Reactive Guidance on Claims

16 June 2017

### Interpretation Request

1. Are *RSB Global* On-Product claims allowed for material that has been certified against *RSB EU RED*?
2. Under which conditions is the claim "*RSB EU RED*" allowed for material derived from waste or residues which has been certified by other EU recognized voluntary schemes?

### Reactive Guidance

1. The *RSB Global* procedure RSB-PRO-50-001<sup>1</sup> allows on-product claims for "**RSB compliant biomass/biofuel**" if (amongst other requirements) the material is derived from RSB compliant biomass and derivatives. For material certified against *RSB EU RED* the compliance claim "**RSB compliant biomass/biofuel**" may be used alternatively only if the biomass or biofuel is derived from
  - RSB-compliant **primary biomass**, or
  - Secondary (end-of-life-products, by-products or residues) materials listed in RSB-STD-01-010, Annex 1<sup>2</sup> that have no further feedstock specific requirements.

However, the claim "RSB compliant biomass/biofuel" may not be used if the biomass or biofuel is in whole or partly derived from other (than Annex 1) secondary biomass (i.e. waste, residues, by-products or end-of-life-products). In this case the "**RSB EU RED**" on-product claim shall be used.

2. RSB-PRO-11-001-50-001<sup>3</sup> allows on-product claims for "**RSB EU RED Compliant Biomass/Biofuel**" if (amongst other requirements), the material is derived from RSB EU RED-compliant biomass (see F.2.1.4). If biomass/biofuel is derived from material certified by a certification scheme other than RSB, that is recognized by the EU, only the claim "**EU RED Compliance**" is allowed. However, where another certification scheme is recognized by an equivalency analysis approved by the RSB the "**RSB EU RED Compliant Biomass/Biofuel**" claim may be used (see F.3.6.)

This reactive guidance confirms that we consider equivalency under the following conditions, which have to be complied with in addition to the requirements of the applicable RSB Standards and procedures:

- a) The intermediate / biofuel / biomaterial is derived from waste or residues as defined eligible in RSB-STD-11-001-01-010<sup>4</sup>; and
- b) The intermediate / biofuel / bioproduct is derived from waste or residues for which no feedstock specific requirements are defined in RSB-STD-11-001-01-010.  
Alternatively, evidence of compliance with the feedstock specific requirements shall be submitted to the auditor for verification;

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<sup>1</sup> RSB Procedure on Communication and Claims

<sup>2</sup> RSB Standard on end-of-life-products, residues and residues

<sup>3</sup> Consolidated RSB EU RED Procedure on Communications and Claims

<sup>4</sup> Consolidated RSB EU RED Standard on waste and residues



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- c) Certification against the other system only covers the supply chain up to the first collector and traders. Certification of processing units against other systems than RSB is not equivalent. In this case an “RSB EU RED” claim is therefore not acceptable anymore and an “EU RED” claim shall be used