



RSB
Roundtable on
Sustainable Biomaterials
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Reactive Guidance on EU RED Claims: Outsourcing industrial processes to operators not included in the RSB EU RED certification scope

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1. Interpretation Requested for the following scenario:

An RSB EU participating operator is owner of RSB EU certified feedstock and intends to outsource the conversion of feedstock into a product while keeping the ownership of the material. The outsourcing is based on an agreement with an industrial unit, which is independent from the RSB EU RED participating operator. This industrial unit is not within the RSB EU certificate scope of the participating operator, nor does it hold an own RSB EU certificate. However, it is certified by another EU recognized voluntary scheme.

Under which conditions is the claim “EU RED compliant” allowed for the RSB EU feedstock processed by that independent industrial unit?

2. Applicable Standards

1. RSB-STD-11-001-30-001¹ requires the PO to define the certification scope, including (amongst others) the details of all the operation sites, subsidiaries, branch offices, individuals and supply chain structures where RSB-compliant products are produced, processed, acquired, handled or forwarded (see 1.3.2).

2. RSB-PRO-11-001-50-001² Section 3 covers the situations where EU RED compliance claims are allowed for biomass/biofuels certified through other sustainability systems recognised by the European Union.

3. RSB-STD-11-001³ requires that all participating operators producing, converting, processing, trading biomass/biofuels / bioliquids for use in the European Union and recognition under EU RED and/or the EU Fuel Quality Directive comply with the provisions of that standard in addition to the RSB Principles & Criteria and all other RSB EU RED standards and procedures.

The standards above define the requirements that apply if industrial units are within an RSB EU certification scope or whenever they are suppliers of their own EU RED compliant biomass / biofuels. However, these standards do not have provisions for RSB Operators to outsource industrial processes from operators certified by another EU recognized voluntary scheme.

¹ Consolidated RSB EU RED Standard for Participating Operators

² Consolidated RSB EU RED Procedure on Communication and Claims

³ Standard for EU market access



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3. Guidance

Under the RSB EU RED certification scheme it is not allowed to make RSB EU claims on biomass/biofuels handled by industrial processors certified by other EU recognized voluntary schemes than RSB. This is because RSB requires compliance with the RSB Principles and Criteria at industrial site level while the other EU RED voluntary schemes are limited to traceability and GHG emission calculations⁴.

However, RSB certified operators using independent processors described above may make claims limited to EU RED compliance (i.e. not using RSB trademarks) under the following conditions:

- a) The industrial unit holds a valid EU RED certificate⁵, which scope covers the operations and biomass type being processed;
- b) There is an agreement in place for outsourcing between the RSB EU RED certified participating operator and the industrial unit, where it is clearly stated that
 - the RSB EU RED certified participating operator keeps the legal ownership of the feedstock and the product and
 - only the RSB EU RED certified participating operator is allowed to make EU RED complaint claims and issue Proofs of Sustainability for the feedstock and the products covered by the agreement;
 - all necessary records and documents are provided by the industrial operator to the RSB EU RED certified operator (eg. disaggregated GHG emissions value for the industrial process outsourced, conversion factors of its industrial process for mass balance purposes etc).
- c) The RSB EU RED certified participating operator complies with all provisions of RSB-PRO-11-001-50-001 regarding “EU RED compliance claims”;
- d) The RSB EU RED certified participating operator is responsible for the GHG calculation and traceability of the feedstock and products and the compliance with the respective requirements in RSB-STD-11-001 and RSB-STD-11-001-20-001;
- e) Records and documents for evidencing the conditions a) b) c) and d) above are available and shall be verified by the auditors (eg. copy of the outsourcing agreement, details of the EU RED certificate of the industrial unit, copy of verified GHG emissions and disaggregated value for industrial process, chain of custody records regarding certified inputs and outputs, as well as related product information, among others);
- f) The information about outsourcing and the limitation to EU RED compliance claims is clearly stated on the public summary of RSB audit report.

⁴ RSB Principles & Criteria are applicable to industrial units doing chemical conversion; in case of only mechanical or physical process, the RSB P&C are not applicable.

⁵ It shall be confirmed that the voluntary or national scheme has been recognized by the European Commission for the relevant scope.