

RSB – ROUNDTABLE ON SUSTAINABLE BIOMATERIALS

**RSB EU RED Procedure for Traceability
(RSB EU RED Chain of Custody Procedure)**

Version 3.7

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Introduction

All RSB certified operators acquiring, handling or forwarding *RSB EU RED* or *EU RED* Certified Material are required to implement a chain of custody system in line with this procedure.

Under this procedure, *RSB EU RED* or *EU RED* Certified biomass / biofuels / bioliquids / biomass fuels / renewable liquid and gaseous transport fuels of non-biological origin and recycled carbon fuels shall be tracked from the farm to the final user, each time they pass through an internal processing step or change ownership (i.e. custody) along the supply chain (or “chain of custody”). A supply chain includes each stage of processing, conversion, transformation, manufacturing, trading and distribution where progress to the next stage involves a change of legal and/or physical control.

Supply chains can begin at the stage of feedstock production, or in the case of waste and residue-based chains, will start at the Point of Origin (See the RSB EU RED Standard for Advanced Fuels [RSB-STD-01-010] for more details).

All RSB certified operators legally and/or physically controlling *RSB EU RED* and/or *EU RED* certified biomass / biofuels / bioliquids / biomass fuels / renewable liquid and gaseous transport fuels of non-biological origin and recycled carbon fuels along the supply chain are required to establish effective and transparent chain of custody tracking systems, which will be verified by the certification body during the audit process. This verification step increases transparency along the supply chain and reduces the risk of fraud.

RSB provides (3) different options for the chain of custody system that shall be put in place: Identity Preserved, Product Segregation, and Mass Balance.

Information about the chain of custody systems, as well as their requirements for traceability can be found in this procedure.

Main changes between Version 3.6 and Version 3.7

- a. Added requirement to enter information into a union database (F.1.14)
- b. Clarification on mass balance calculation methods, as character-specific and use of energy content multipliers (F.3.4.9)
- c. Updated the balancing period for agricultural and forestry materials (F.3.4.11.2)
- d. Requirement that transfer of sustainability characteristics must always be accompanied by a physical transfer of material (F.3.4.12)
- e. Clarification to explicitly state that double-counting of sustainability claims shall not occur (F.4.4)
Expansion of information requirements in Annex 1

Please see the full history of changes in the Annex III of this Procedure.

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A. The aim of this procedure

The aim of this procedure is to ensure that RSB certified operators put in place a robust and transparent chain of custody system that provides traceability for the *RSB EU RED* and/or *EU RED* Certified Material (e.g. biomass, chemical intermediaries, biofuel, etc.) acquired from and/or delivered to other operators in the supply chain.

This procedure also aims to ensure that sustainability claims based on compliance with RSB standards and procedures only accompany material that is acquired, handled, and forwarded by RSB certified operators according to the requirements included in this procedure.

B. What this procedure covers

This procedure applies to any RSB-certified operator acquiring, handling and/or forwarding *RSB EU RED* and/or *EU RED* Certified Material (i.e. material certified against a voluntary or national scheme recognised by the European commission for compliance with conditions set out in Directive (EU) 2018/2001). The first section describes general requirements that RSB certified operators shall meet when putting in place chain of custody systems. It is followed by specific requirements for the acquisition, handling and forwarding of certified material.

C. Version and date

Version 3.7 of this RSB EU RED Procedure for Traceability (Chain of Custody) shall be effective on 28th June 2021.

Whenever any contradiction or inconsistency exists between this version and previous versions of this procedure, the latest version shall prevail. Any new version of this document will be notified immediately via email to all Participating Operators, Certification Bodies and RSB Accreditation Body.

D. Note on using this procedure

All parts of this procedure are considered to be normative, including its aim, scope, effective date, notes on its use, references, terms and definitions, requirements and annexes, unless stated otherwise. When putting this procedure in place operators shall make sure that all of the requirements specified in this procedure, and any other measures necessary to achieve its aim, are met. In case of a conflict between this procedure and the EU Market Access Standard [RSB-STD-11-001], the latter shall prevail.

E. Terms and definitions

For the purposes of this procedure, the terms and definitions given in RSB Glossary of Terms [RSB-STD-01-002] shall apply. The following terms are particularly important:

Acquisition process

The acquisition process includes any and all aspects of ordering, sourcing, procuring, buying, purchasing, receiving or otherwise gaining legal and physical control of a product.

Acquiring a product, time of

The time of acquisition of a product refers to the time when direct or indirect legal and physical control (ownership) is acquired

Batch

A specific quantity of a product that is intended to have uniform characteristics and qualities.

Chain of custody

Process by which inputs and outputs and associated information are transferred, monitored and controlled as they move through each step in the relevant supply chain (Source: ISO 22095:2020).

Chain of custody system

Set of measures designed to implement a Chain of Custody, including documentation of these measures (Source: ISO 22095:2020).

First Collector of waste and residues

Operator that receives waste or residual materials from points of origin

EU RED Certified Material

Refers to biomass / biofuels / bioliquids / biomass fuels / renewable liquid and gaseous transport fuels of non-biological origin and recycled carbon fuels certified by any voluntary scheme or national scheme recognised by the European Commission other than RSB. *EU RED Certified Material* may be handled by an RSB certified Participating Operator and forwarded with an “EU RED Compliant” on-product claim, following RSB EU RED Procedure on Communication and Claims [RSB-PRO---50-001].

Forwarding of material

Refers to the transfer of legal control of *RSB EU RED* or *EU RED Certified Material* to the next operator in the supply chain.

Handling of material

Refers to the storage, processing and transport of *RSB EU RED* or *EU RED Certified Material* within the operations included in the scope of certification (e.g. the transformation of municipal solid waste into gas through pyrolysis or a warehouse/trader storing bioethanol).

Point of origin

Companies or private households where waste and residues occur.

RSB Certified Material

Refers to biomass or biofuels certified to the global RSB Principles & Criteria [RSB-STD-01-001] and other relevant RSB standards and procedures.

RSB EU RED Certified Material

Refers to biomass / biofuels / bioliquids / biomass fuels / renewable liquid and gaseous transport fuels of non-biological origin and recycled carbon fuels certified to the RSB Principles & Criteria [RSB-STD-01-001] and other relevant RSB EU RED standards and procedures.

F. Requirements

1. General Requirements

1. 1. The operator shall put in place a chain of custody system to track *RSB EU RED* and/or *EU RED* Certified Material through the processes included in the scope of certification. This system shall meet all requirements of this procedure.
1. 2. The operator shall appoint a management representative as having overall responsibility and authority for putting in place and monitoring the chain of custody system.
1. 3. The operator shall identify and document the employees or third parties involved in the chain of custody system, in particular those in charge of the acquisition, handling and forwarding (including the verification of the product information) of *RSB EU RED* and/or *EU RED* Certified Material.
1. 4. The operator shall provide involved employees with appropriate training and make sure they have the needed competences, knowledge and experience to put the chain of custody system in place.
1. 5. The operator shall have all necessary infrastructure (e.g. software or other tools) and operating procedures in place to effectively operate the chain of custody system and ensure that *RSB EU RED* and/or *EU RED* Certified Material can be tracked continuously without interruption through all processing and trading steps taking place within the scope of certification between the acquisition of the material and forwarding to clients.
1. 6. The operator shall document all sites where *RSB EU RED* and/or *EU RED* Certified Material is acquired, handled and forwarded and where internal processing steps occur (See also Section F.1.3 of the Procedure for Operators taking part in RSB certification systems [RSB-PRO-30-001]), with additional requirements for site records as follows:

1. 6. 1.
 - **Farms, Plantations or Forestry:**
 - List of fields or other production areas (hectares), status (in production/not in production), biomass type, chain of custody model employed.
 - List of all recipients of sustainable biomass (e.g. collection points, storage facilities, warehouse, traders), including their address and contracts.
 - Additional sites used by the operator but owned by third parties.
 - Production records (including yield per field);
 - Sales orders, sales invoices, dispatch information, including dates, customers to which the batch or lot was dispatched, delivery records;
 - Stock records including inventory balancing, for storage sites;
 - Transporter or shipper details.

1. 6. 2. **Industrial units (including mechanical operators.):**
 - List of all suppliers of certified material, and copy of their valid certificates;
 - Purchase documents including, e.g. purchase orders, contracts, invoices and goods receipts inspections, delivery notes and received quantities;
 - Processing information including the conversion factors and specification of quantities of materials and products, stored and finished;
 - Production records;
 - Sales orders, sales invoices, dispatch information, including dates, customers to which the batch or lot was dispatched, delivery records;
 - Stock records including inventory balancing;
 - Transporter or shipper details;
 - Records of mass balance calculation (if relevant);
 - List of sites, status (in production/not in production),
 - Chain of custody model employed.
 - List of all recipients of certified material (e.g. collection points, storage facilities, warehouse, traders), including their address and contracts.
 - Additional sites used by the operator but owned by third parties.

1. 6. 3.
 - **Collection Points, Storage Facilities, Warehouse and Traders**
 - List of all suppliers of certified material, and copy of their valid certificates.
 - Purchase documents including, e.g. purchase orders, contracts, invoices and goods receipts inspections, delivery notes and received quantities;
 - Sales orders, sales invoices, dispatch information, including dates, customers to which the batch or lot was dispatched, delivery records;
 - Stock records including inventory balancing;
 - Transporter or shipper details;
 - List of all collection points, including name and address;
 - Record of mass balance calculation (if relevant¹);
 - If the operator is not the legal owner of the storage site, a written contract between the operator and the legal owner of the site will be required to forward products with an *RSB EU RED* or an *EU RED* compliance claim included with the product information.

1. 7. The operator shall keep these records for 5 years.

1. 8. Greenhouse gas (GHG) emissions for transport shall be added, either by a) the certified operator forwarding *RSB EU RED* or *EU RED* Certified Material, prior to its transport; b) the certified operator responsible for transport of the *RSB EU RED* or *EU RED* Certified Material; or c) the certified operator acquiring *RSB EU RED* or *EU RED* Certified Material, after its transport. GHG emissions for transport can be calculated by using disaggregated default values for transport (see EU RED Directive 2018/2001/EU Annex V) or by using the RSB GHG Calculator or accepted alternatives.

1. 9. The operator shall make sure that sufficient details to identify the material are included in the product information attached to every batch of *RSB EU RED* or *EU RED* Certified Material that is acquired, handled or forwarded.
Full details of product information requirements/guidelines for each operator type are available in Annex I.

Please Note: additional requirements for documentation may apply in certain EU Member States (e.g. NABISY system in Germany). Please contact the RSB Secretariat for more details.

¹ Participating Operators implementing Identity Preserved or Segregation models are not required to provide this record

1. 10. If the operator is implementing more than one chain of custody systems in the operation(s) (e.g. one of their clients require physically segregated batches of products while others use mass balance), the operator shall keep a separate accounting for products acquired through each chain of custody system used. The operator may group various products that share similar characteristics in terms of product type, quality and production process into product groups.
1. 11. If the operator is simultaneously acquiring, producing, processing, handling or forwarding *RSB Certified Material*, *RSB EU RED Certified Material* and/or *EU RED Certified Material*, the operator shall keep a separate accounting for the different compliance claims (i.e. RSB, RSB EU RED, EU RED).
1. 12. The operator shall provide any product information required in this procedure upon request to the RSB Secretariat, the Accreditation Body and/or the responsible Certification Body.
1. 13. The operator shall notify the responsible Certification Body and the RSB Secretariat about any modification in your chain of custody system.
1. 14. The operator shall enter accurate information into a Union database to ensure transparency and traceability of the feedstock, intermediate or fuel. This should provide information on the transactions made and the sustainability characteristics of those feedstocks, intermediates or fuels, including their life-cycle greenhouse gas emissions.

Please Note: The Commission shall ensure that a Union database is put in place to enable the tracing of liquid and gaseous transport fuels, including information on the transactions made and the sustainability characteristics of those fuels, including their life-cycle greenhouse gas emissions, starting from their point of production to the fuel supplier that places the fuel on the market. While Member States should be allowed to continue to use or establish national databases, those national databases should be linked to the Union database, in order to ensure instant data transfers and harmonisation of data flows.

2. Specific Requirements for Acquiring *RSB EU RED Certified Material* or *EU RED Certified Material*

2. 1. Any and all acquisition of *RSB EU RED Certified Material* or *EU RED Certified Material* shall be based on a contractual agreement between the operator and the operator's supplier.

Please Note: this includes purchases made on spot markets.

2. 2. The operator shall make sure that the product information described in Annex I for each batch of incoming RSB EU RED Certified Material or EU RED Certified Material is provided by the supplier (e.g. in the supplier invoice, transport documentation, proof or sustainability other supporting documentation) and shall keep records of this information.
2. 3. If the operator is acquiring EU RED certified material the operator shall make sure that the voluntary or national scheme is recognised by the European Commission for the scope needed for this material, such as:
 - Feedstock type.
 - Feedstock origin.
 - Biomass / biofuel / bioliquid / biomass fuel / renewable liquid and gaseous transport fuel of non-biological origin / recycled carbon fuel production geography.
 - Extent of supply chain covered.
 - Sustainability criteria covered (e.g. approaches to determine GHG emission reduction values).

Please Note: information can be found here:
https://ec.europa.eu/energy/topics/renewable-energy/biofuels/voluntary-schemes_en#approved-voluntary-schemes

3. Specific Requirements for Handling RSB EU RED Certified Material or EU RED Certified Material

3. 1. The operator shall keep records of the product information described in Annex I for handling *RSB EU RED* Certified Material or *EU RED* Certified Material in process.
3. 2. **For operators using an Identity Preserved chain of custody system:**
 3. 2. 1. The operator shall document each batch of *RSB EU RED* Certified Material in each internal processing step included in the certification scope separately.
 3. 2. 2. The operator shall not mix a batch of *RSB EU RED* Certified Material tracked under this system with a batch of *RSB EU RED* Certified Material from a different place of origin or a batch of products that are not *RSB EU RED* certified.
 3. 2. 3. to the operator shall inform the responsible Certification Body and change the tracking model to “Product Segregation” under the following circumstances:
 3. 2. 3. 1. if a “batch” of *RSB EU RED* Certified Material is physically mixed with a batch of *RSB EU RED* Certified Material from a different place of origin; or

3. 2. 3. 2. in cases where the documentation associated with a batch of *RSB EU RED* Certified Material was not kept separate from another batch of *RSB EU RED* Certified Material.
3. 2. 4. It will be necessary to inform the responsible Certification Body and change your tracking model to “Mass Balance” if a batch of *RSB EU RED* Certified Material is physically mixed with a batch of *EU RED* Certified Material or with a batch of products that are not *RSB EU RED* or *EU RED* certified in an internal processing step.
3. 3. **For operators using a Product Segregation chain of custody system:**
 3. 3. 1. The operator shall document *RSB EU RED* Certified Material separately from products that are not *RSB* certified.
 3. 3. 2. The operator shall keep *RSB EU RED* Certified Material physically separate from products that are not *RSB EU RED* certified.
Note: The operator can mix different batches of RSB EU RED Certified material.
 3. 3. 3. Whenever *RSB EU RED* Certified Materials with different GHG intensities are mixed together, the operator may calculate the greenhouse gas (GHG) intensity of each batch of *RSB EU RED* Certified Material in the mix and apply the highest GHG intensity to the entire mix or track the individual GHG intensities separately.

Example: 1,000 Liters of RSB EU RED certified bioethanol with a GHG intensity of 40 g CO2 eq/MJ mixed with 1,000 Liters of RSB EU RED certified bioethanol with a GHG intensity of 50 g CO2 eq/MJ will make 2,000 Liters of RSB EU RED certified bioethanol with a GHG intensity of 50g CO2 eq/MJ.
 3. 3. 4. The operator shall not use the “identity of product preserved” tracking model in any internal processing steps if the “product segregation” tracking model was used anywhere in the preceding steps of the supply chain.
 3. 3. 5. The operator shall inform the responsible Certification Body and change the tracking model to “Mass Balance” if a batch of *RSB EU RED* Certified Material is physically mixed with a batch of products that are not *RSB EU RED* certified in an internal processing step.
3. 4. For operators using a **Mass Balance** chain of custody system:

As defined by Article 30 of Directive (EU) 2018/2001, a mass balance system

(a) allows consignments of raw material or fuels with differing sustainability and greenhouse gas emissions saving characteristics to be mixed for instance in a container, processing or logistical facility, transmission and distribution infrastructure or site; and

(b) allows consignments of raw material with differing energy content to be mixed for the purposes of further processing, provided that the size of consignments is adjusted according to their energy content; and

(c) requires information about the sustainability and greenhouse gas emissions saving characteristics and sizes of the consignments referred to in point (a) to remain assigned to the mixture; and

(d) provides for the sum of all consignments withdrawn from the mixture to be described as having the same sustainability characteristics, in the same quantities, as the sum of all consignments added to the mixture and requires that this balance be achieved over an appropriate period of time.

3. 4. 1. If several operational sites are included in the scope of certification, each operational site shall maintain its own Mass Balance accounting system.

The mass balance system shall operate at a level where consignments could normally be in contact, such as in a container, processing or logistical facility, transmission and distribution infrastructure or site (defined as a geographical location with precise boundaries within which products can be mixed).
3. 4. 2. If more than one legal entity operates on a site then each legal entity is required to operate its own mass balance.
3. 4. 3. The operator shall record *RSB EU RED* Certified Material separately from *EU RED* certified material.
3. 4. 4. The operator shall record *RSB EU RED* Certified Material separately from materials that are not certified to either *RSB EU RED* or *EU RED*.
3. 4. 5. The operator shall record the compliance claim associated with each batch of *RSB EU RED* or *EU RED* Certified Material.
3. 4. 6. The operator may physically mix *RSB EU RED* Certified Material with products that are *EU RED* certified and/or with products that are not certified to either *RSB EU RED* or *EU RED*.

3. 4. 7. Whenever *RSB EU RED* Certified Materials and/or *EU RED* Certified Materials with different GHG intensities are mixed together, the operator may either apply the highest GHG intensity to the entire mix or track the individual GHG intensities separately.

Example for applying the highest GHG intensity: A mix containing:

- 1,000 Liters of RSB EU RED certified biodiesel with a GHG intensity of 40 g CO₂ eq/MJ

- 1,000 Liters of RSB EU RED certified biodiesel with a GHG intensity of 50 g CO₂ eq/MJ

- 1,000 Liters of EU RED certified biodiesel with a GHG intensity of 35 g CO₂ eq/MJ

will make 2,000 Liters of RSB EU RED certified biodiesel with a GHG intensity of 50g CO₂ eq/MJ and 1,000 Liters of EU RED certified biodiesel with a GHG intensity of 50g CO₂ eq/MJ.

3. 4. 8. The operator shall monitor the balance of *RSB EU RED* and/or *EU RED* Certified Material withdrawn from and added to your mass balance system, taking into account the conversion factor (whenever processing is involved). The conversion factor shall be calculated as follows:

$$\text{Conversion factor [\%]} = \frac{\text{Output}}{\text{Input}} \times 100$$

The conversion factor shall be calculated based on the actual output of a specific product, coproduct and/or residue.

Whenever a batch of certified material is processed, the information on the sustainability and greenhouse gas emission saving characteristics of the batch shall be adjusted and assigned based on the following rules:

- a) When the processing yields only one output that is intended for the production of production of biofuels, bioliquids or biomass fuels, renewable liquid and gaseous transport fuels of non-biological origin, or recycled carbon fuels, the size of the consignment and the related quantities of sustainability and greenhouse gas emission saving characteristics shall be adjusted applying a conversion factor representing the ratio between the mass of the output that is intended for such production and the mass of the raw material entering the process;
- b) When the processing of a consignment yields more than one output intended for the production of biofuels, bioliquids or biomass fuels, renewable liquid and gaseous transport fuels of non-biological origin, or recycled carbon fuels, for each output a separate conversion factor shall be applied and a separate mass balance shall be used.

3. 4. 9. The operator shall keep the mass balance *characteristic-specific*.
- Transferring the “RSB EU RED certified” from one type of material to another type of material (e.g. different types of raw materials or fuels) is only allowed if they have similar physical or chemical characteristics, heating values and/or conversion factors.
- Differences in the energy content are permitted if the raw materials are mixed for the purpose of further processing (e.g. in a co-digestion plant), provided that the size of consignments is adjusted according to their energy content.
- The application of the mass balance system to different types of raw materials and fuels must not lead or risk to lead to a situation where the rules set out in Article 26 and 27 of Directive (EU) 2018/2001 that apply for determining the contribution of biofuels, bioliquids and biomass fuels towards the targets for renewable energy are not correctly applied or circumvented.
3. 4. 10. Reconciliation (e.g. monthly) of RSB EU RED and/or EU RED certified inputs and outputs shall be available, including control of purchases and sales of the product.

Please Note: reconciliation of RSB EU RED certified inputs and outputs shall be separate from the reconciliation of EU RED certified inputs and outputs.

3. 4. 11. The operator shall monitor the balance of *RSB EU RED* and/or *EU RED* Certified Material withdrawn from and added to your mass balance system. The operator may use either of the following accounting methods:
3. 4. 11. 1. Continuous: Deficits of *RSB EU RED* or *EU RED* Certified Material shall not occur; i.e. the operator shall not forward or deliver greater amount of *RSB EU RED* or *EU RED* Certified Material than you acquire or produce;
3. 4. 11. 2. Fixed: Deficits of *RSB EU RED* or *EU RED* Certified Material may occur, as long as balance is achieved over a fixed period of maximum 3 months.

For agricultural or forestry materials, the mass balance period may be to be up to one year, but for any period longer than three months the material is not permitted to go into deficit.

i.e. The operator may forward or deliver greater amount of *RSB EU RED* or *EU RED* Certified Material than you acquire or produce as long as the total amount of forwarded/delivered *RSB EU RED* or *EU RED* Certified Material over (at maximum) 3 months equals the amount of acquired/produced *RSB EU RED* or *EU RED* Certified Material over the same period, considering the conversion factor.

3. 4. 12. The operator may report a positive balance of *RSB EU RED* or *EU RED* Certified Material into the next reporting period if the corresponding amount of material is in stock and until the positive balance is expended.

Please Note: The transfer of sustainability characteristics must always be accompanied by a physical transfer of material. At the end of the mass balance period, the sustainability data carried forward should be equivalent to the physical stock.

3. 4. 13. The operator shall not use the “identity of product preserved” or “segregation” tracking model in any internal processing steps if the “mass balance” tracking model was used anywhere in the preceding steps of the supply chain.

4. Specific Requirements for Forwarding *RSB EU RED* Certified Material or *EU RED* Certified Material

4. 1. Any and all forwarding of *RSB EU RED* Certified Material or *EU RED* Certified Material shall be based on a **contractual agreement** between the operator and their customers.

Please Note 1: this includes purchases made on spot markets.

Please Note 2: A purchase order might also be a contractual agreement

4. 2. The operator shall include a proof of sustainability (PoS) to any batch of outgoing *RSB EU RED* Certified Material or *EU RED* Certified Material. The PoS shall include the product information described in Annex I. The operator may use regular sales documentation (invoices, bill of lading, etc.) instead of PoS as long as it includes the product information described in Annex I.

Please note: RSB provides a template for the PoS that may be used by the operator

4. 3. The operator shall keep records of all product transfer information for a period of five years.
4. 4. If a consignment of raw material or fuel has already been accounted for in the calculation of the share of renewable energy in any Member State, no further sustainability claims shall be issued for the consignment.

5. Specific requirements related to the certification of renewable gases

5. 1. Renewable gases can be mixed in the transmission and distribution infrastructure (gas grid), provided the infrastructure is interconnected.
Please note: The direction of the gas flow in the respective part of the grid does not have to be considered for a gas grid to be interconnected.
5. 2. The physical input (injection) to the gas grid and physical output (withdrawal) from the gas grid shall be documented by the operator. The following evidence shall be available to the auditor:
 - a) Documentation of renewable gas fed into the grid by the means of a calibrated measurement of the renewable gas. Amounts of fossil gas that may have been added to adjust the energy content shall be subtracted.
 - b) Verification of the renewable gas fed into the grid by the relevant gas network operator
5. 3. The operator shall ensure that double claiming of renewable gas is avoided at all times. To that end, the operator shall provide the auditor with the complete mass balance records of the renewable gas, including those gas volumes that are used for purposes other than as renewable energy under Directive 2018/2001/EC. This includes records related to the registration of the renewable gas in available registries, for example the Denmark Energinet², the German Biogas Register³, the Biomethane Register Austria⁴.

To avoid double-counting, RSB EU RED certified biomethane volumes must be reported into the Union Database for biomethane, or other as approved by the EU Commission.

5. 4. The operator shall at all times avoid registering the same volume of renewable gas in multiple registries.
5. 5. Whenever any incentive or subsidy has been received for the renewable gas, the operator shall make this information available to the auditor and transmit the information on the type of support (RES sector and country) as part of the product information (see Annex I)
Please note: There may be implications for the accounting to Member States targets whenever the withdrawal of renewable gas volumes is in a different country than the injection and the renewable gas production or grid injection was already subject to incentives or subsidies for electricity / heat.
5. 6. Gas losses must be included in the scope of the GHG emissions savings calculation. A standard industry factor can be applied for this purpose.

² www.energinet.dk

³ <https://www.biogasregister.de/en/home/>

⁴ www.agcs.at

Annex I: Summary of required product information to be recorded by the Participating Operator for RSB EU RED and EU RED Certified Material at different steps

A. General Information

For incoming RSB EU RED or EU RED Certified Material (“acquisition”):

- Description of the incoming material, including technical specification, if available
- Specification of the raw material that was used to produce the product (i.e. specification of the crop, waste or residue, etc. that was used)
- Statement if the raw material meets the definition for waste and residues
- Statement if the raw material is a high iLUC risk feedstock
- Statement if raw material/fuel is low indirect land-use change risk
- Statement if raw material/fuel is listed in Annex IX of Directive 2018/2001/EU (see Annex VI of RSB Standard for EU Market Access)Country of feedstock origin
- Quantity of certified material(s)
- Date of acquisition and (if different from the date of acquisition) date of entry in the participating operator’s chain of custody tracking and management systems
- Location of the site where RSB EU RED or EU RED Certified Material is acquired (i.e. origin of raw material) or biomethane entry point
- Name and address of supplier(s)
- Name and address of the last production/processing/transmission and distribution site
- If the previous production/processing/ transmission and distribution site is managed by an external third party, the name and address of this external third party
- Date production plant in operation (for fuel production plant only)
- *For RSB EU RED certified material only:* valid RSB Certificate number, Certification Body and Chain of custody model employed at the supplier’s last processing site
- *For EU RED certified material only:* Name of the certification scheme and valid certificate number;

- *RSB EU RED* or *EU RED* Short claim (see RSB-PRO-50-001)
- Greenhouse Gas Intensity (calculated using the EU RED methodology, or any calculator/tool that has been recognised by the European Commission for the purposes of the EU RED. State whether ‘default’ or ‘actual’ intensity).
- In cases where actual values are used:
 - GHG emissions value in g CO₂ equivalent/MJ of fuel (for biofuels / bioliquids / biomass fuels / renewable liquid and gaseous transport fuels of non-biological origin and recycled carbon fuels) and g CO₂ equivalent / dry-ton feedstock (for biomass and intermediaries)
 - Values for the following elements of the calculation shall be stated separately:
 - Emissions from the extraction or cultivation of raw materials
 - Annualized emissions from carbon stock changes caused by land use change
 - Emissions from processing
 - Emissions from transport and distribution
 - Emission saving from soil carbon accumulation via improved agricultural management
 - Emission saving from carbon capture and geological storage
 - Emission saving from carbon capture and replacement
 - Emission saving from excess electricity from cogeneration
- In case (disaggregated) default values are used, the following information shall be provided in line with Annex V and Annex VI of Directive (EU) 2018/2001:
 - Feedstock (e.g. wheat)
 - Process technology (e.g. natural gas as process fuel in conventional boiler)
 - Transport distance
- For waste and processing residues (other than agricultural crop residues, aquaculture, fisheries and forestry residues) and (intermediary) products made thereof: Statement that compliance with the sustainability criteria according to Article 29(3) to (7) of Directive (EU) 2018/2001 was not audited and not certified
- For renewable gases, statement whether material has received incentive/subsidy and type of support (RES sector and country)

For *RSB EU RED* or *EU RED* Certified Material in process within your scope of certification (“handling”), the operator should keep the following records:

- Identification and description of the process
- Name and address of the site(s) where the production steps occur
- Conversion factor(s)⁵ used in processing of each group of products (where relevant)

For outgoing RSB EU RED or EU RED Certified Material (“forwarding”):

- Description of the product, including the technical specification, if available
- Specification of the raw material that was used to produce the product (i.e. specification of the crop, waste or residue, etc. that was used)
- Statement if the raw material meets the definition for waste and residues
- Statement if the raw material is a high iLUC risk feedstock
- Statement if raw material/fuel is low indirect land-use change risk
- Statement if raw material/fuel is listed in Annex IX of Directive 2018/2001/EU (see Annex VI of RSB Standard for EU Market Access)
- Quantity of certified product(s)
- Date of shipment
- Name and address of customer(s) and delivery site
- Name and address of production/storage/ transmission and distribution site(s) and site from which the product is forwarded⁶ or biomethane exit point
- If the site from which the product is forwarded is managed by an external third party, the name and address of this external third party
- Country of feedstock origin
- Country of fuel production (if relevant)
- Date production plant in operation (for fuel plant only)
- Unique number of the delivery note (e.g. Bill of lading, or invoice #)
- ID number of batch
- valid RSB Certificate number, Certification Body and Chain of custody model employed
- *RSB EU RED or EU RED Short claim* (see RSB-PRO-50-001)
- For waste and processing residues (other than agricultural crop residues, aquaculture, fisheries and forestry residues) and (intermediary) products made

⁵ Conversion Factors are used to calculate the amount of outcomes based on the initial amount of material entering the processing step. They are expressed as a ratio of Liters of outcomes per Liter of entering material, Liters per ton, m³ per ton etc.

⁶ Last internal processing step where the RSB/RSB EU RED/EU RED compliant product is handled.

thereof: Statement that compliance with the sustainability criteria of the Renewable Energy Directive 2018/2001/EU was not audited and not certified

- Greenhouse Gas Intensity (calculated using the EU RED methodology, or any calculator/tool that has been recognised by the European Commission for the purposes of the EU RED). State whether 'default' or 'actual' intensity.
- In case (disaggregated) default values are used: State "default value" or "disaggregated default value"
- In case (disaggregated) default values are used, state the following in line with Annex V and Annex VI of Directive (EU) 2018/2001:
 - Feedstock (e.g. wheat)
 - Process technology (e.g. natural gas as process fuel in conventional boiler)
- In case actual values are used: State GHG emissions value in g CO₂ equivalent/MJ of fuel (for biofuels / bioliquids / biomass fuels / renewable liquid and gaseous transport fuels of non-biological origin and recycled carbon fuels) and g CO₂ equivalent / dry-ton feedstock (biomass and intermediaries)
- In case actual values are used, separate values for the following elements of the calculation shall be stated separately:
 - Emissions from the extraction or cultivation of raw materials
 - Annualized emissions from carbon stock changes caused by land use change
 - Emissions from processing
 - Emissions from transport and distribution
 - Emission saving from soil carbon accumulation via improved agricultural management
 - Emission saving from carbon capture and geological storage
 - Emission saving from carbon capture and replacement
 - Emission saving from excess electricity from cogeneration
- Statement whether the GHG value contains transport emissions. If not, list the transport type and transport distance (in km)
- For renewable gases, statement whether material has received incentive/subsidy and type of support (RES sector and country)

B. In addition to the requirements listed in A, in case of industrial units (mills, feedstock processing, fuel production, refinery, blending facility the following data shall be also informed by the operator to its customer:

- If biomass / biofuel / bioliquid / biomass fuel / renewable liquid and gaseous transport fuel of non-biological origin / recycled carbon fuel is being delivered to a retailer, an electricity, heat or co-generation plant, also include the following in accordance with the GHG Emissions Calculation Methodology described in RSB-STD-11-001 (RSB EU Market Access Standard) or any other calculator recognised by EU RED.
 - GHG emissions value in g CO₂ equivalent/MJ
 - Fossil fuel comparator in g CO₂ eq/MJ (dependent on end use)
 - The GHG emissions savings (%)

Annex II: Visual representations of 3 of the chain of custody system options

A. Identity Preserved

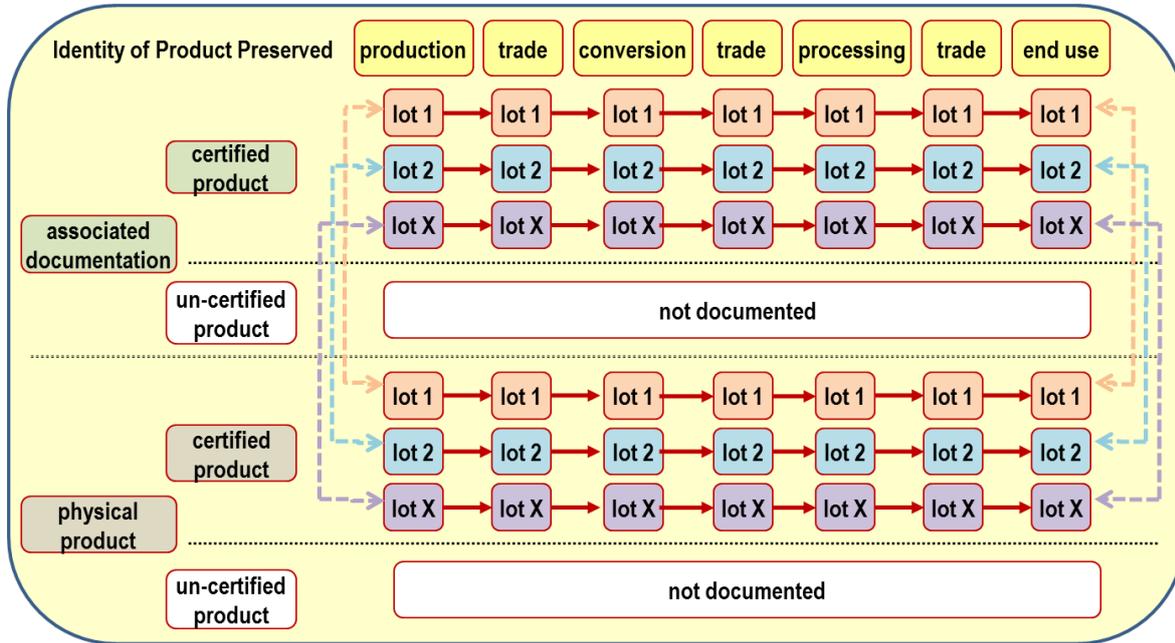


Figure 1: All product lots (batches) are kept separately. E.g. a batch of *RSB EU RED* certified feedstock from Farm A cannot be mixed with a batch of *RSB EU RED* certified feedstock from Farm B.

B. Product Segregation

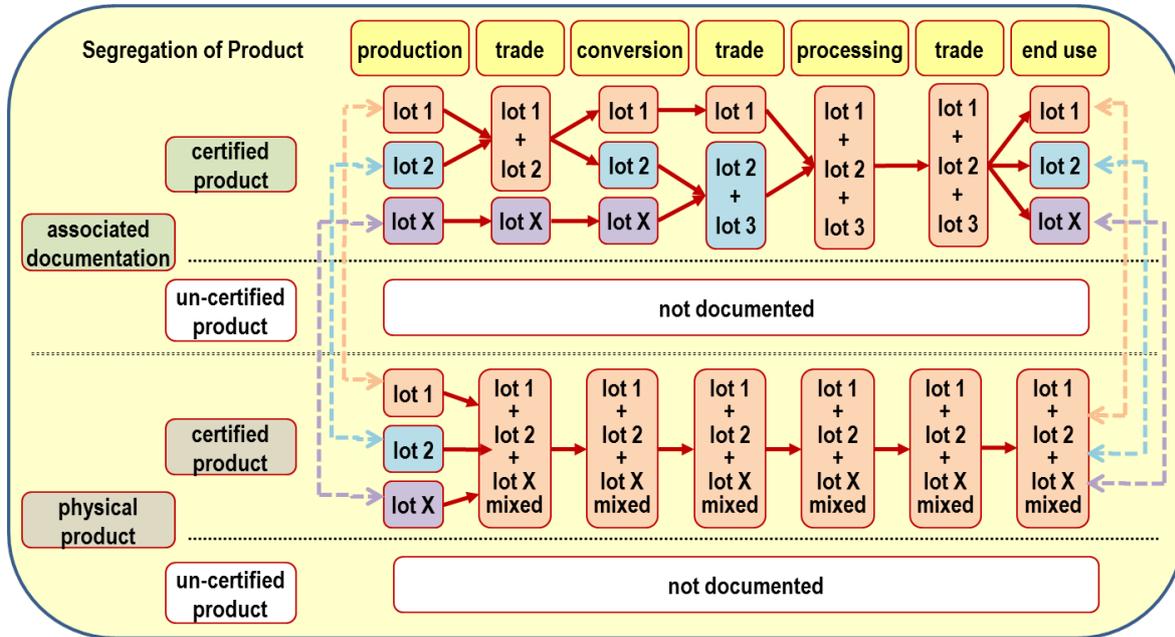


Figure 2: Certified products are kept separate from non-certified products. E.g. a batch of *RSB EU RED* certified biodiesel from Unit A can be mixed with a batch of *RSB EU RED* certified biodiesel from Unit B, but not with a batch of non-*RSB EU RED* certified biodiesel from Unit C.

C. Mass Balance

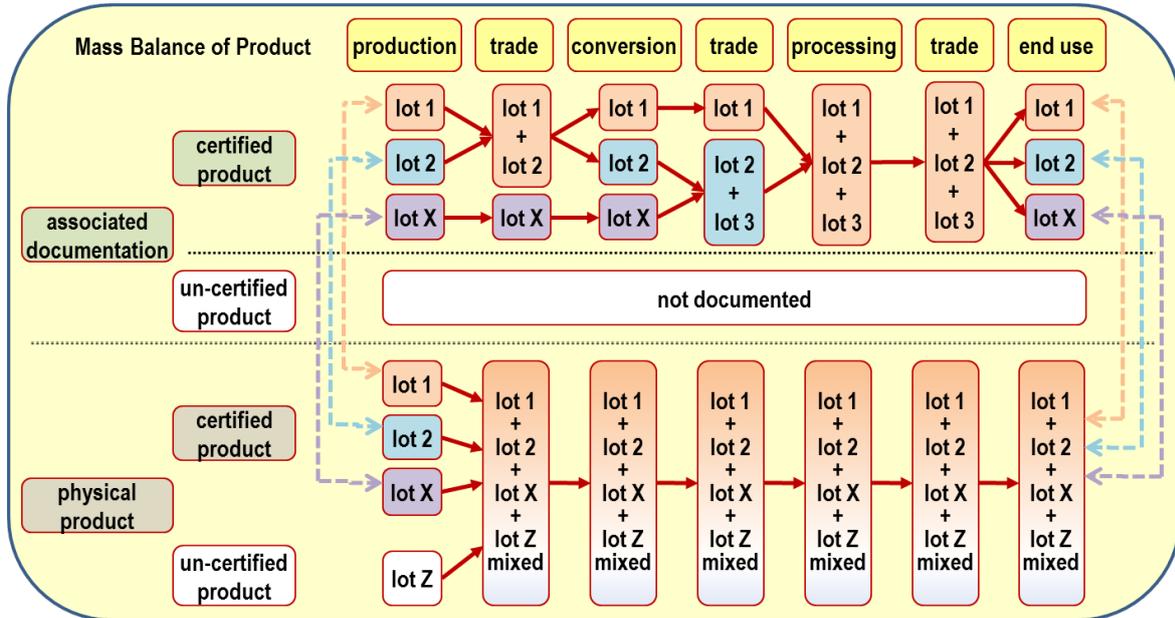


Figure 3: All products may be mixed, as long as documentation remains separate. E.g. a batch of *RSB EU RED* certified ethanol from Producer A can be mixed with a batch of non-*RSB EU RED* certified ethanol from Producer B. An equivalent quantity of certified and uncertified product can then be later sold to different markets, according to the mass balance accounting of the inputs.

Annex III: History of Changes

Main changes between Version 3.6 and Version 3.7

- f. Added requirement to enter information into a union database (F.1.14)
- g. Clarification on mass balance calculation methods, as character-specific and use of energy content multipliers (F.3.4.9)
- h. Updated the balancing period for agricultural and forestry materials (F.3.4.11.2)
- i. Requirement that transfer of sustainability characteristics must always be accompanied by a physical transfer of material (F.3.4.12)
- j. Clarification to explicitly state that double-counting of sustainability claims shall not occur (F.4.4)
- k. Expansion of information requirements in Annex 1 to cover biogas and biomethane supply chains

Main changes between Version 3.5 and Version 3.6

- a. Annex 1 was updated to ensure a transparent transmission of information in waste and residue based supply chains.

Main changes between Version 3.4 and Version 3.5 (based on updated version of the EC assessment protocol)

- a. Clarification that *EU RED certified* material refers also to material certified by a national scheme recognized by the European Commission.
- b. Requirement added that the scope of the recognition has to be taken into account when accepting material from other voluntary schemes (see F.2.3.).
- c. Clarification that operators may also track GHG intensities separately (see F.3.3.3 and F.3.4.7).
- d. Clarification that several legal entities operating on one site need individual mass balance documentations (F.3.4.2). and further explanation on the conversion factor (F.3.4.8.).
- e. Amendment regarding required product information (see Annex I).

Main changes between Version 3.3 and Version 3.4 (based on feedback from the European Commission (24 April 2015):

- a. Clarification that the latest version of the document prevails over older versions (Section C).

Main changes between Version 3.2 and Version 3.3 (based on feedback from the European Commission (25 March 2015):

- a. The possibility of using GHG calculators recognised by the EC is made more explicit.

Main changes between Version 3.1 and Version 3.2 (based on feedback from the European Commission (23 Feb 2015):

- a. In 3.4.9.2, “is consistent with” was replaced by “equals” to avoid confusion. In 3.4.10, the need for the corresponding material to be in stock to carry over positive balance is clarified.
- b. Additional clarifications were added to Annex I: ‘*Location of the site where RSB EU RED or EU RED Certified Material is acquired*’ is understood as ‘*Origin of raw material*’, as per EU RED. The possibility to use GHG calculators recognized by the EC is made more explicit.

Main changes between Version 3.0 and Version 3.1

- a. The requirements for product information were clarified and split among three subsections corresponding to the acquisition, handling and forwarding of certified material.
- b. The term “product information” is now used instead of “product documentation”, as this would allow information to be recorded through other means than written documents.
- c. The term “legally binding agreement” is replaced by “contractual agreement” for clarity.
- d. The required product information was simplified (Annex I)
- e. Minor language improvements were made and the numbering was updated.

Main changes between Version 2.0 and Version 3.0

- a. This document is the result of a merger between 4 standards (RSB-STD-11-001-20-001, RSB-STD-11-001-20-002, RSB-STD-11-001-20-003, and RSB STD-11-001-20-004). All the generic chain-of-custody requirements and specific requirements for every CoC model (Identity preserved, segregation, and mass balance) are now integrated into a single standard.
- b. This standard was entirely re-written using the “plain English” approach, which
- c. aims to make the content clearer.
- d. The word *RSB EU RED Certified Material* is used in replacement of *RSB EU RED Compliant Product* and other similar terms.
- e. Additional information was added on the management of mass balance systems and Product Transfer Documentation (Annex I).
- f. The possibility for an RSB-certified operator to acquire and process *EU RED* certified material (i.e. certified by another EU-recognised scheme) is now included, in line with the RSB EU RED Procedure on Communication and Claims (RSB-PRO-11-001-50-001).
- g. The numbering was updated.