

RSB – ROUNDTABLE ON SUSTAINABLE BIOMATERIALS

**RSB Procedure for Operators Taking Part in the RSB
Certification System
(RSB Procedure for Participating Operators)**

Version 3.4

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Introduction

This procedure sets out the conditions operators shall meet when taking part in the *RSB certification system* and describes requirements related to the application for the certification, the preparation of the audit as well as the responsibilities during and after the audit. Operators taking part in the *RSB certification system* are referred to as *Participating Operators* (POs).

POs take full responsibility for all operations, processes, activities and sites listed in the scope of certification to implement RSB standards and procedures and ensure compliance at all times.

Main changes from the previous version (Version 3.3)

- a) Updated guidance on the types of certifications and standards a PO already has in place prior to an EU RED audit by the RSB.
- b) Definitive confirmation that any PO failing or unwilling to comply with the requirements of the EU Standard will be excluded from certification.
- c) Updated guidance on the role and responsibilities of a group manager where applicable.

Main changes from the previous version (Version 3.2)

- a. Annex I: updated Standard and Procedure names in Applicable Standards for RSB EU RED certification.

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A. The aim of this procedure

This procedure aims to set out requirements for POs on the following aspects:

- POs commitment to implementing and maintaining compliance with RSB standards and procedures;
- Definition of the certification scope; and
- Responsibility and liability for fully and consistently complying with RSB standards and procedures for the certification scope of the operation.

B. Scope

This procedure is an international procedure and is valid worldwide. It sets out the general requirements for operations producing, converting, processing, trading and using eligible material in RSB certification systems.

This procedure applies to POs intending to be certified under the certification schemes RSB Global, RSB EU RED, RSB ICAO CORSIA and RSB Japan.

POs are legal entities or natural persons that have entered into a formal agreement with the RSB Association (“Participating Operator Agreement”) and that are responsible for the implementation of the requirements of all applicable RSB Standards and Procedures in all organisations listed in the scope of certification.

C. Version and date

Version 3.3 of this procedure came into effect on 30 December 2023 (the ‘effective date’). 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 distributed 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 we say otherwise. When putting this procedure in place Participating Operators shall make sure that all of the requirements specified in this procedure are met and any other measures necessary to achieve its aim are implemented.

For RSB EU RED certifications, in cases of a conflict between this procedure and the EU Market Access Standard [RSB-STD-11-001], the latter shall prevail.

For RSB ICAO CORSIA certifications in case of a conflict between this procedure and the ICAO CORSIA Market Access Standard [RSB-STD-12-001], 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.

F. Requirements

1. Applying for Certification

The following section describes the documents Participating Operators shall provide to the RSB Secretariat to apply for the certification process.

1. 1. The Participating Operator (PO) shall accept the Terms and Conditions on the RSB website (Participating Operator Agreement) which include the following elements:
 1. 1. 1. A confirmation that the POs activities have not been suspended as a result of administrative or legal action taken by a public authority or any other group or individual;
 1. 1. 2. A confirmation that the PO supports the RSB, RSB standards and RSB procedures;
 1. 1. 3. A commitment to fully comply with all RSB standards and RSB procedures that apply, as specified in the certification scope (See 1.3);
 1. 1. 4. Information about any parts of the operations in the scope of certification which may put at risk how RSB standards and procedures are met and put in place, or which may reflect badly on or affect RSB's good name, or which go against the RSB vision and mission. This includes information about any social or environmental dispute or conflict, and about legal or criminal proceedings.
 1. 1. 5. Circumstances under which RSB may suspend or terminate the Participating Operator Agreement.
 1. 1. 6. A confirmation that under the PO and its legal predecessors has not in the last 2 years been suspended or terminated by the withdrawal of an EU RED certificate (issued by any EU RED voluntary scheme) following an audit which confirmed critical non-conformity.
1. 2. The PO shall provide and keep updated a documented profile of all activities and operations under the certification scope (See 1.3) which are affecting, or could affect, how RSB standards and procedures are put in place.

The POs profile shall include, at a minimum, the following information:

1. 2. 1. A description of the legal status.
1. 2. 2. A list of the governing bodies and a description of their role and responsibilities within the organisation.
1. 2. 3. Names, details, descriptions, organisational charts and any other relevant information about subsidiaries, branch offices, connected organisations, other organisations or individuals contracted or otherwise involved, operational structures, sites, facilities, processing and production units, supply chain structures, authorities, functions, roles and responsibilities, and if it applies, management systems including policies, procedures, and controlling systems and risk-management systems.
1. 2. 4. A description of the POs experience of putting in place social, environmental, economic and management standards and procedures, including a list of:
 1. 2. 4. 1. Standards and certification systems the PO currently has in place and their status, including for RSB EU RED applications:
 - Whether the PO or their legal predecessor are currently participating in another EU RED voluntary scheme or have participated in another voluntary scheme in the last 5 years;
 - All relevant information, including the mass balance data and the auditing reports and, where applicable, any decisions to suspend or withdraw their certificates in the last 5 years;
 - Whether the PO withdrew from a scheme before the first surveillance audit.

Please Note: The PO shall declare the names of all sustainability certification systems under which the PO is and / or was certified and make available to the auditors all information relevant to those certifications.
 1. 2. 4. 2. The certification bodies the PO is involved with;
 1. 2. 4. 3. Consultants the PO has appointed to advise on how to put standards and certification systems in place; and
 1. 2. 4. 4. Certifications withdrawn, suspended or terminated.
1. 3. The PO shall define the certification scope, including:
 - the product(s) for which the certification is intended;
 - the sites and facilities that the certification is covering, including a list of feedstock producers and points of origin (if covered by the certification);
 - the applicable certification scheme, and
 - the applicable standards and other normative document(s) (see annex for further information)

Additionally, the PO shall provide, at a minimum, the following information:

1. 3. 1. The name and details of the management representative who has overall responsibility for compliance with all of RSB standards and procedures that apply.
1. 3. 2. 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, as listed in the certification scope, including:
 1. 3. 2. 1. Name and location
 1. 3. 2. 2. Geographic coordinates (latitude and longitude)
 1. 3. 2. 3. Position in the supply chain and legal status within the organisation
 1. 3. 2. 4. Name and details of the local management representative who has the responsibility for compliance with all of RSB standards and procedures that apply
 1. 3. 2. 5. Total surface (Hectares) or production volumes (Metric Tons)

Note: In the case of Points of Origin delivering to the PO, the total amount of material generated per month as well as the amount delivered to the PO per month shall be included
 1. 3. 2. 6. Description of the production/processing steps, including conversion factors and product characteristics
 1. 3. 2. 7. Types of RSB-compliant product produced, processed, acquired, handled or forwarded. This will include relevant product characteristics, product classification, product documentation, product groups and product types.
1. 3. 3. The 'chain of custody' tracking models that are applied
1. 3. 4. The PO shall include in the certification scope (See 1.3) all production, processing and any other steps that are necessary to produce and sell the certified product from the feedstock entering the certification scope.
1. 3. 5. Operation sites with continuous boundaries cannot be divided into smaller certification units.

Example: the PO cannot divide a contiguous plantation or a field into smaller units and exclude some of these smaller units from the certification scope. Non-contiguous fields or operational sites under common ownership may be excluded from the certification scope.

1. 4. The PO shall have contracts with all the groups, people and structures listed in 1.3.2:

1. 4. 1. These contracts shall specifically refer to the commitment of the groups, people and structures listed in 1.3.2 above to put in place and comply with RSB standards and procedures.

Please Note: Contracts referred to in this clause may either refer to the RSB standards and procedures in general or may specifically refer to those RSB requirements that are relevant for the type of operator that the PO has the contract with. In this case, the auditor will verify that all applicable requirements are mentioned.

1. 4. 2. The commitment to put in place and comply with RSB standards and procedures shall include a commitment to provide unrestricted access to any of the groups, people and places listed in 1.3.2 above, including for RSB EU RED certification scopes access for Member States to premises of POs where requested.

Participating Operators failing or unwilling to comply with the requirements set out by the EU Commission and Members states in full shall be respectively excluded from participating in EU RED certification.

1. 5. The PO shall ensure that it has and maintains the necessary knowledge, competencies, skills and systems for complying with RSB standards and procedures. In particular, the management representative with overall responsibility for putting the applicable standards and procedures in place shall be knowledgeable and competent to do so.
1. 6. The PO shall carry out a self-risk assessment of the operations as defined in the certification scope (See 1.3), in conformity with the RSB Procedure for Risk Management [RSB-STD-60-001]¹.

Please Note: RSB Secretariat will publish the application on their website for two weeks to get external comments. Any comment will be sent to the CB with whom the PO has a contract to carry out the RSB audit. The PO will be given a Participating Operator Number.

2. Preparing the Audit

To prepare for main audits (i.e. certification or re-certification audits) as well as for surveillance audits, the PO shall do the following:

2. 1. Enter into an agreement with an RSB-recognised certification body ('the certification body') for evaluation against RSB standards through an official audit process;

¹ POs may use the online tool for Self-Risk Assessment. More information at www.rsb.org
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2. 2. Make sure the audit process starts within six months of the application, and that the first audit is a field audit;
2. 3. Make sure that the management representative is kept fully informed about putting in place RSB standards and procedures. The PO shall also ensure that they have a documentation management system, that the system is auditable for safekeeping and reviewing all evidence related to the claims they make or rely on, that records are complete and up to date, covering all parts of complying with RSB standards and systems and that these records are kept for at least five years or longer where it is required by the relevant national authority (in the case of EU RED scope of certification);
2. 4. Make sure that the management representative has all the systems and methods they need to fully comply with RSB standards and procedures;
2. 5. Inform the RSB Secretariat and the certification body immediately about any changes to the POs ownership and legal structure, business scope, organisational structure and management responsibilities as well as any changes to the documented profile (as required under point 1.2) and the certification scope (as required under point 1.3);
2. 6. Have systems in place for fair, equal and open management, and for settling disputes and complaints about the POs performance raised by staff or other people or organisations, in line with the RSB Grievance Procedure [RSB-PRO-65-001]. The PO shall record how they have managed and settled all disputes and complaints;
2. 7. The PO shall keep updated the self-risk assessment (See 1.6), in conformity with the RSB Procedure for Risk Management [RSB-PRO-60-001] and inform the RSB Secretariat and the certification body immediately about any changes to the results of the self-risk assessment;
2. 8. The PO shall carry out and keep updated a self-evaluation of the operations as defined in the certification scope (See 1.3), to comply with RSB standards and procedures.

The PO shall include in the self-evaluation all the requirements RSB ask for in the applicable standards and procedures. Where available, the PO should use RSB indicators and checklists to demonstrate that they are complying with RSB standards and procedures. If necessary, the PO may introduce further indicators and checkpoints.

The PO shall clearly indicate any extra indicators and checkpoints in the self-evaluation.

2. 9. The PO shall carry out and keep updated the screening exercise of the operations as defined in the certification scope in accordance with RSB-GUI-01-002-02

Please Note: The operator types **Trader** and **Mechanical Operator** do not have to carry out the screening exercise (see annex for definitions).

2. 10. If requested, the PO shall make available to auditors all mass balance data in

advance of the audit.

2. 11. Where group auditing is selected (see RSB-PRO-70-001 for certification scopes where group auditing is permitted), the POs within the group shall designate a Group Manager.

The Group Manager shall be responsible for developing an internal management system that ensures compliance of all members with the requirements of the RSB Standards. This shall include at minimum the following:

- Set up a procedure to register new group members (e.g. PoOs, farms).
- Ensure that all group members understand the RSB requirements and processes.
- Maintain an up-to-date register of members.
- Exclude members in the case of non-compliance.
- Inform the group members about relevant changes to requirements.

Group audits will be conducted in-line with requirements set out in the RSB Procedure for CBs and Auditors [RSB-PRO-70-001], Section H1.5.

Please note: Audits of the group manager shall always be conducted on-site.

3. During the Audit Process

When the audit process ('the evaluation') is being conducted by the certification body, the PO shall do the following:

3. 1. Produce documented evidence through the means of an auditable documentation management system that they comply with all the requirements listed in this procedure and all other applicable RSB standards and procedures;
3. 2. Inform the certification body and the RSB Secretariat immediately (i.e. within 3 working days) about any part of the operations in the scope of certification which may pose a risk of a major non-compliance with the RSB standards and procedures;
3. 3.
 1. Deal immediately with any issue relating to not complying with RSB standards and procedures ('Non-Compliances') which may be identified during evaluation;
 2. Assess the root causes for major non-compliances to identify the source or origin of a non-compliance, as well as any contributing factors involved.
 3. Define corrective action measures and their timelines (activities that the PO is planning to take) to address non-compliances and their root-causes.
 4. Submit the corrective action plan and actions the PO has taken to deal with non-compliances (that is, whether the PO has corrected the problem to bring it into line with RSB standards and procedures) to the certification body for evaluation and approval.
 5. Provide any additional information as requested by the certification body to close non-compliances.

6. Major non-compliances shall be corrected within 90 days of the audit closing meeting, minor non-compliances shall be corrected according to the corrective action plan within 12 months of the audit closing meeting.

Notes on the result of the audit process

The certification body will evaluate the compliance (conformity) with relevant RSB standards and procedures, following the audit procedures defined by the RSB.

The certification body will evaluate the corrective action plan and communicate to the PO whether the corrective action plan is accepted. The certification body will also monitor and evaluate all actions taken by the PO to address non-compliances.

The certification body will issue a certificate of compliance, unless major non-compliances are found in the operations, which cannot be corrected within 90 days.

The certification body will document the audit findings and conclusions in a public audit summary report. It is the responsibility of the certification body to ensure that the public audit summary report does not include any element of confidential nature, as agreed with the PO upon signature of the certification contract.

The RSB certificate and the public audit summary report will be posted on the RSB website.

In case the PO disagrees with the results of the evaluation by the certification body, they may file a grievance, following RSB Grievance Procedure [RSB-PRO-65-001].

Please see more information on the audit and certification process in the RSB Procedure for Certification Bodies and Auditors [RSB-PRO-70-001].

4. After the Audit Process

4. 1. If the PO fails to achieve a successful audit, the PO shall make sure they are evaluated again by the certification body within six months otherwise they will lose their participating operator number.
4. 2. Upon issuance of a valid certificate by the certification body, the PO shall do the following:
 4. 2. 1. Use RSB trademarks according to the requirements described in the RSB Procedures on Communications and Claims [RSB-PRO-50-001];
 4. 2. 2. Make sure further audits are carried out with the certification body, in accordance with the agreed audit schedule and before the valid certificate runs out;
 4. 2. 3. Not carry out or take part in any activity which could damage the RSB's good name or go against the RSB vision and mission;

4. 2. 4. Tell the certification body and the RSB Secretariat immediately if they know that RSB trademarks, standards and procedures are being misused. Misuse includes if RSB standards and procedures are not being met or are at risk of not being met. This applies to all operations, whether or not they are within the certification scope, and whether or not they are formally engaged with the RSB Secretariat or any other part of our organization or certification systems.
4. 3. Whenever new operations are to be included in the certification scope, the PO shall:
 - have valid contracts in place in line with 1.4.; and
 - carry out a self-risk assessment in line with 1.6.; and
 - carry out a self-evaluation in line with 2.8.; and
 - carry out a screening exercise in line with 2.9; and
 - submit the amended certification scope to the certification body for evaluation.

Note on the audit process for scope extensions:

The certification body will assess the documentation received and determine the type of evaluation needed to confirm the amended scope. For example, for industrial facilities added to the scope of certification, the evaluation will include an on-site audit.

Following the evaluation, the certification body will issue the revised formal audit and certification documentation. Please see more information about scope extension in the RSB Procedure for Certification Bodies and Auditors [RSB-PRO-70-001].

Only after the new operations have been approved by the CB to the certification scope, those operations are considered to be part of the RSB certification scope.

Annex I: Scope of RSB Documents Applicable at the Audit for different operator types

Operator types

The RSB standard specifies requirements for the following operator types:

- *Primary Biomass Producer*: Organisation that applies for certification for a specific activity that includes the production of crops or woody material, for example farm operators or plantation owners.
- *Points of Origin*: The generator, such as companies, farms, forest areas, residences, industries and commercial facilities of end-of-life-products, production residues or other waste materials.
- *First Collectors*: Operator that receives end-of-life-products, by-products or production residues from points of origin.
- *Industrial Operators*: Organisation that applies for certification for a specific activity that includes feedstock processing and/or the *production of intermediary products, fuels or advanced products*.
- *Mechanical operator*: Subgroup of industrial operators only conducting mechanical or physical processing, i.e. mixing, assembling, sorting, moulding, cutting, plastics extrusion. For further mechanical processes to be added to the list, please consult with the RSB Secretariat.
- *Trader*: Organisation that applies for certification for a specific activity that includes buying and selling of materials or products, including raw materials, intermediates and final products. Examples for traders are first collectors, blenders, wholesale and retail companies (also companies selling to end-consumers) as well as airlines or shipping companies selling transport services to their clients.

Please Note: Traders not necessarily have physical ownership of the product

Please Note: Whenever organisations process materials, they are either **industrial operators** or **mechanical operators**.

Applicable standards for RSB Global Certification

Energy Products (road transport, shipping, aviation fuels)

	RSB Principles & Criteria [RSB-STD-01-001]	RSB GHG Calculation Methodology [RSB-STD-01-003-01]	RSB Procedure for Participating Operators [RSB-PRO-30-001]	RSB Chain of Custody Procedure [RSB-PRO-20-001]	For waste or residues-based fuels: RSB Advanced Fuels Standard [RSB-STD-01-010]	RSB Procedure for Communication & Claims [RSB-PRO-50-001]	RSB Procedure for Risk Management [RSB-PRO-60-001]
Biomass Producer	√ √*	√ √	√ √	√ √		√ √	√ √
Points of Origin					√ √		
First Collector		√ √	√ √	√ √	√ √	√ √	√ √
Industrial Operator	√ √*	√ √	√ √	√ √	√ √	√ √	√ √
Mechanical Operator		√ √	√ √	√ √	√ √	√ √	√ √
Trader		√ √	√ √	√ √	√ √	√ √	√ √

√: Main audit, √: Surveillance audit, √*: The surveillance audit shall focus on the implementation of the ESMP, the correction of non-conformities and compliance with progress requirements

Non-energy Products (Advanced Products)

	RSB Principles & Criteria [RSB-STD-01-001]	RSB GHG Calculation Methodology [RSB-STD-01-003-01]	RSB Procedure for Participating Operators [RSB-PRO-30-001]	RSB Chain of Custody Procedure [RSB-PRO-20-001]	RSB Procedure for Communication & Claims [RSB-PRO-50-001]	RSB Procedure for Risk Management [RSB-PRO-60-001]	RSB Standard for certification of Advanced products [RSB-STD-02-001]	For waste or residues based Advanced products: [RSB-STD-01-010]
Biomass Producer	√ √*	√ √	√ √	√ √	√ √	√ √	√ √	
Points of origin								√ √
First Collector		√ √	√ √	√ √	√ √	√ √	√ √	√ √
Industrial Operator	√ √*	√ √	√ √	√ √	√ √	√ √	√ √	√ √
Mechanical Operator		√ √	√ √	√ √	√ √	√ √	√ √	√ √
Trader		√ √	√ √	√ √	√ √	√ √	√ √	√ √

√ : Main audit, √: Surveillance audit, √*: The surveillance audit shall focus on the implementation of the ESMP, the correction of non-conformities and compliance with progress requirements

Applicable standards for RSB EU RED certification

	RSB Principles & Criteria [RSB-STD-01-001]	RSB Standard for EU Market Access [RSB-STD-11-001]	RSB Procedure for Participating Operators [RSB-PRO-30-001]	RSB EU RED Procedure for Traceability (Chain of Custody) [RSB-STD-11-001-20-001]	RSB EU RED Standard for Advanced Fuels [RSB-STD-11-001-01-010]	RSB Procedure for Communication & Claims [RSB-PRO-50-001]	RSB Procedure for Risk Management [RSB-PRO-60-001]
Biomass Producers	√ √*	√ √	√ √	√ √		√ √	√ √
Point of Origin		√ √			√ √		
First Collector		√ √	√ √	√ √	√ √	√ √	√ √
Industrial Operator	√ √*	√ √	√ √	√ √	√ √	√ √	√ √
Mechanical Operator		√ √	√ √	√ √	√ √	√ √	√ √
Trader		√ √	√ √	√ √	√ √	√ √	√ √

Please note: In the event of any inconsistency between the *RSB Principles & Criteria* and the *RSB EU Market Access Standard*, the *RSB EU Market Access Standard* shall prevail

√: Main audit, √: Surveillance audit, √*: The surveillance audit shall focus on the implementation of the ESMP, the correction of non-conformities and compliance with progress requirements

Applicable standards for RSB ICAO CORSIA certification

	RSB Principles & Criteria [RSB-STD-01-001]	RSB ICAO CORSIA Standard [RSB-STD-12-001]	RSB Procedure for Participating Operators [RSB-PRO-30-001]	RSB Chain of Custody Procedure [RSB-PRO-20-001]	RSB Procedure for Communication & Claims [RSB-PRO-50-001]	For waste or residues-based fuels: RSB Advanced Fuels Standard [RSB-STD-01-010]	RSB Risk Management Procedure [RSB-PRO-60-001]
Biomass Producers	√ √*	√ √	√ √	√ √	√ √		√ √
Point of Origin		√ √				√ √	
First Collector		√ √	√ √	√ √	√ √	√ √	√ √
Industrial Operators	√ √*	√ √	√ √	√ √	√ √	√ √	√ √
Mechanical Operator		√ √	√ √	√ √	√ √	√ √	√ √
Trader		√ √	√ √	√ √	√ √	√ √	√ √

√ : Main audit, √ : Surveillance audit, √* : The surveillance audit shall focus on the implementation of the ESMP, the correction of non-conformities and compliance with progress requirements

Applicable standards for RSB Japan certification

	RSB Principles & Criteria [RSB-STD-01-001]	RSB GHG Calculation Methodology [RSB-STD-01-003-01]	RSB Procedure for Participating Operators [RSB-PRO-30-001]	RSB Chain of Custody Procedure [RSB-PRO-20-001]	RSB Procedure for Communication & Claims [RSB-PRO-50-001]	For waste or residues-based fuels: RSB Advanced Fuels Standard [RSB-STD-01-010]	RSB Risk Management Procedure [RSB-PRO-60-001]
Biomass Producers	√ √*	√ √	√ √	√ √	√ √		√ √
Point of Origin	√ √*					√ √	
First Collector		√ √	√ √	√ √	√ √	√ √	√ √
Industrial Operators	√ √*	√ √	√ √	√ √	√ √	√ √	√ √
Mechanical Operator		√ √	√ √	√ √	√ √	√ √	√ √
Trader		√ √	√ √	√ √	√ √	√ √	√ √

√ : Main audit, √: Surveillance audit, √*: The surveillance audit shall focus on the implementation of the ESMP, the correction of non-conformities and compliance with progress requirements