Reactive Guidance on achieving the GHG emission reduction threshold under the RSB Standard for Advanced Products

RSB-STD-02-001

May 2020, version 1.0

1. Background
The RSB Standard for Advanced Products requires that certified final products which are intended to replace fossil derived products should achieve at least a 10% greenhouse gas (GHG) emission reduction relative to the lifecycle GHG emissions of a comparable fossil product. The purpose of this requirement is to ensure that certified products create a real, measurable and verifiable positive climate impact. In addition, it enables operators to communicate this positive impact to customers.

For operators in the early phase of pilot facilities and innovative processes however, technologies employed at the certified site may not yet be optimised, meaning that the anticipated GHG emission reduction may not yet be achieved. This poses a challenge to these types of operators, who wish to achieve RSB certification early on in their process development and drive market demand for certified sustainable products, but are unable to meet the required 10% GHG emission reduction threshold.

RSB recognise that the RSB standards and certification should serve not as a barrier to innovation but to support sustainability improvements, in-line with the RSB mission to enable a just transition to a net positive world.

2. Objective and Scope
This guidance clarifies the application of the GHG emission reduction threshold of 10% defined in the RSB Standard for Advanced Products in the context of pilot and demonstration-scale facilities and innovative processes.

3. Applicable Standards
RSB-STD-02-001, RSB Standard for Advanced Products, requirement F2.2.1. Whenever certified final products are intended to replace fossil derived products, these certified final products shall achieve at least 10% lower lifecycle greenhouse gas emissions calculated on a cradle-to-grave basis relative to the lifecycle greenhouse gas emissions of a comparable fossil product.

RSB-PRO-50-001, RSB Procedure on Communications and Claims, requirement 6.1.3. The logo user shall not use the RSB logo for anything not covered by the scope of certification.
4. Guidance

Operators with innovative processes and/or pilot facilities whose certified products will not achieve the minimum GHG emission reduction threshold of 10% at the final product stage may be exempt from the submission of GHG values to their customers for 3 years after the certificate is issued under the following conditions:

I. Evidence can be shown to demonstrate that the 10% GHG emission reduction threshold can be met or exceeded in an improved scenario which will be achieved through implementing the activities documented under point II below. Evidence may be a GHG calculation of the improved scenario, technical specification, engineering data etc.

And

II. Documentation is in place to evidence the existing planning of measures to improve the process which will achieve the 10% GHG emission reduction threshold, signed or approved by upper management. Evidence may include but is not limited to a project plan with responsibilities and timelines for work packages, business plans, budget allocation etc.

In exceptional cases, the RSB Secretariat may grant an extension to the 3 year period, allowing the operator to meet the GHG emission reduction threshold within maximum 5 years from date of first audit. In order for this exception to be granted, operators shall submit information to the RSB secretariat to clearly describe the need for the 5 year period, including additional information relating to the planning of the facility as per Evidence 4.II above.

5. Auditing requirements

A. Evidence required

Auditors shall verify in the first (main) certification audit that the above documentation exists and provides sufficient evidence that the 10% GHG emission reduction threshold is highly likely to be met within 3 years of certificate issuance.

Auditors shall verify in surveillance audits the operator’s progress in meeting the timelines defined in the project plan. Operators shall show timely progress suggesting that the objective of meeting the 10% GHG emission reduction threshold is highly likely to be met within the required timeframe.

Timelines may change as long as the project can be implemented and 10% GHG emission reduction threshold achieved within 3 years of the first (main) audit.

B. Claims and communications

Operators that apply this rule shall communicate to their customers that they are improving their GHG performance and will not share any GHG values up to that point.

Operators that receive material for which this rule is applied and that produce final products are exempt from the GHG emission reduction threshold.
During this time for all types of products (final or intermediate) no claims can be made on the current GHG performance of the product or site or on meeting the GHG emission reduction threshold, as per RSB-PRO-50-001, requirement 6.1.3.

In addition, during this time operators applying this rule shall communicate clearly about the planned performance increase and coming into compliance with the RSB GHG emission reduction threshold within three years. This may be in the form of product related documentation and/or external communications and does not need to be on-product.

6. Rationale

The RSB Advanced Products Standard requirement F.1.4 already recognises that RSB-certified feedstock may not be available to operators when first becoming certified, and makes provisions for the scaling up of RSB-certified feedstocks to a specified threshold over a 3 year period. It follows that the same provision should be made to allow for progressive scaling up of innovative processes and pilot facilities, to enable operators to come into compliance with the 10% GHG emission reduction threshold within 3 years.

The intention of this provision is to enable operators with new and innovative technologies and solutions to demonstrate and improve their positive climate impact through RSB certification using a step-wise, progress-related approach, thereby creating an enabling environment for positive climate impacts to be nurtured, recognised and verified through the RSB Standards.