

Surveillance Audit Summary Report

Roundtable on Sustainable Biomaterials

Global

Gevo Inc.

SCS Certificate Code: SCS-RSB/PC-0034

Luverne, MN
Karen O'Brien
www.gevo.com

CERTIFIED	EXPIRATION
31 January 2020	30 January 2025

DATE(S) OF AUDIT
13-15 January 2021
DATE OF LAST UPDATE
28 May 2021

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FOREWORD

SCS Global Services (SCS) is a certification body accredited by the Roundtable on Sustainable Biomaterials (RSB) to conduct evaluations of biofuel operators (CB Registration No. 592). Under the RSB/SCS certification system, participating operators meeting international standards of biofuel production can be certified as “sustainable,” thereby permitting the Operator’s use of the RSB endorsement and logo in the marketplace subject to regular RSB/SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts all over the world to conduct evaluations of biofuel operations. SCS evaluation teams collect and analyze written materials, conduct interviews with Participating Operator’s staff and key stakeholders, and complete field and office audits of the operation(s) identified in the certification scope. Upon completion of the fact-finding phase of all evaluations, SCS teams determine compliance to the RSB Principles and Criteria.

Please Note: An RSB certificate itself does not constitute evidence that a particular product supplied by the certificate holder is certified to RSB standards. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required RSB claim is clearly stated on-product. For more information about the RSB, visit their website at www.rsb.org.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Roundtable on Sustainable Biomaterials. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs, and policies applied to the Participating Operator, and the results of the evaluation. Section A will be posted on the RSB Participating Operators Database (<http://rsb.org/certification/participating-operators/>). Section B contains more detailed results and information for use by the Participating Operator.

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SECTION A – PUBLIC SUMMARY

1.0 GENERAL INFORMATION

1.1 Operator Information

1.1.1 Name and Contact Information

Organization name	Agri Energy LLC		
Operator Number	2111		
Contact person	Karen O’Brien, Sustainability Engineering Manager		
Address	502 S. Walnut Avenue Luverne, MN 56156 USA	Telephone	(507) 283-9297
		Fax	(507) 283-0001
		e-mail	kobrien@gevo.com
		Website	Gevo.com

1.1.2 Additional Parties Involved

Organization name	Gevo, Inc.		
Contact person	Karen O’Brien, Sustainability Engineering Manager		
Address	345 Inverness Drive South Bldg C Ste 310 Englewood, CO 80112 USA	Telephone	(720) 267-8629
		Fax	N/A
		e-mail	kobrien@gevo.com
		Website	Gevo.com
Nature of Involvement:			
100% owner of Agri-Energy LLC			

Organization name	Circle F Farms		
Contact person	Shawn Feikema		
Address	1735 120th Ave Luverne, MN 56156 USA	Telephone	507 283-9215
		Fax	507 283-2795
		e-mail	shawn@feikemafarms.com
		Website	www.feikemafarms.com
Nature of Involvement:			
Producer of corn.			

Organization name	Feikema Farms Inc.		
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Contact person	Shawn Feikema		
Address	1735 120th Ave Luverne, MN 56156 USA	Telephone	507 283-9215
		Fax	507 283-2795
		e-mail	shawn@feikemafarms.com
		Website	www.feikemafarms.com
Nature of Involvement:			
Corporation that employs personnel who work for Circle F Farms.			

1.2 Scope of Certificate

Please select one:	<input type="checkbox"/> RSB EU RED	<input checked="" type="checkbox"/> RSB Global
Please select boxes that apply:	<input type="checkbox"/> Pre-assessment <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Re-certification <input type="checkbox"/> Follow-Up to NCs	<input checked="" type="checkbox"/> 1st Annual Surveillance <input type="checkbox"/> 2nd Annual Surveillance <input type="checkbox"/> 3rd Annual Surveillance <input type="checkbox"/> 4th Annual Surveillance
Scope as it appears on certificate:	Cultivation of corn and production of isobutanol as an intermediate product	
The scope assessment agrees with the scope under which the operator applied	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If no, please explain:		
<p><i>Note 1: If the scope is different, please contact SCS.</i></p> <p><i>Note 2: Where the client uses external organizations (public or private) to provide utilities services, such as electricity, waste disposal, water, the auditor shall check that these organizations are run according to local requirements (i.e. the law) but these organizations will not be considered in scope of the audit. Therefore no on-site visits to these utility services are required.</i></p>		
Total workers covered by scope of certification:	Circle F Farms: 5 FT, 4 seasonal Gevo: 34 FT	
Number of women workers	Circle F Farms: 0 Gevo: 8 FT	

1.2.1 Determination of Extent of Audit

Total number of subsidiaries, branch offices, affiliated entities, external third parties contracted or otherwise engaged, operational structures, sites, facilities, processing and production units, and supply chain structures	One farm and one biorefinery
Participating Operator Risk Class	Low Risk

Disputes or prior Non-compliances	0
Changes in scope since last evaluation	0
Total number of compliance claims	0

1.2.2 Standards Used

Applicable RSB-Accredited Standards

Standard Name and Version
<ul style="list-style-type: none"> • RSB Principles & Criteria (RSB-STD-01-001 V3.0); • RSB Standard for Participating Operators (RSB-PRO-30-001 V3.2); • RSB Risk Management (PRO-PRO-60-001 V3.2); • RSB GHG Calculation Methodology (RSB-STD-01-003-01 V2.3); • RSB Procedure on Communication and Claims (RSB-PRO-50-001 V3.5); • RSB Chain of Custody (RSB-PRO-20-001 V3.2)

All standards employed are available on the websites of the Roundtable on Sustainable Biomaterials (<https://rsb.org/the-rsb-standard/working-with-the-rsb-standard/>). Standards are also available, upon request, from SCS Global Services.

1.3 Sites in Scope

1.3.1 Agricultural Sites/ Feedstock Production Sites/ Farms

Site Type	<input checked="" type="checkbox"/> Agriculture	<input type="checkbox"/> Forestry
	<input type="checkbox"/> Biomass Production	<input type="checkbox"/> Other:
Feedstock(s) Produced:	Corn	
Current Land Use	Prior Land Use	
<input type="checkbox"/> Biomass Production	<input type="checkbox"/> Biomass Production	
<input checked="" type="checkbox"/> Agriculture	<input checked="" type="checkbox"/> Agriculture	
<input type="checkbox"/> Other:	<input type="checkbox"/> Other:	
Current Employment on Site	Prior Employment on Site	
<input type="checkbox"/> Negligible	<input type="checkbox"/> Negligible	
<input checked="" type="checkbox"/> Local Average	<input checked="" type="checkbox"/> Local Average	
<input type="checkbox"/> Above Local Average	<input type="checkbox"/> Above Local Average	
<input type="checkbox"/> Full	<input type="checkbox"/> Full	
Owned/Controlled By:	Circle F Farms	

Location/City:	Luverne, MN				
Total number of farms included in certification scope	One				
Details on ALL farms in scope:	Farm/Entity	Visited as sample	Location (Lat. - Long.)	Area (ha)	Area Planted (ha)
	1735 120th Ave Luverne, MN 56156 USA	No	N 43.736541 W 96.232834	1654	1445
Were shapefiles of farms requested?	Yes				
Did Operator provide shapefiles of farms included in scope of certification?	Yes, of farm fields only				
Total Area (ha)	1654				
Total Planted Area (ha)	1445				
Total area set aside for conservation purposes (ha)	Approx 6 ha. Buffer strips around fields near Mound State Park and Northern Tallgrass National Wildlife Refuge as well as 50ft average buffer strips around all named streams/creeks.				
Annual Feedstock Production Volume (please specify unit of measurement)	511579 bushels (14748 metric tons) in 2019				
Feedstock Production counted as RSB in last calendar year (tons)	0 (due to pandemic shutdown)				
Amount sold as RSB certified in last calendar year (tons)	0 (due to pandemic shutdown)				
Amount of RSB material in stock at end of last calendar year (tons)	0 (due to pandemic shutdown)				

1.3.2 Industrial Facilities

Name of Facility	Agri-Energy LLC
Type	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Vegetable oil Extraction <input checked="" type="checkbox"/> Biofuel Production and/or Distribution <input type="checkbox"/> Other, please explain here:
Location/City	Luverne, MN USA
Geographic location (Latitude & Longitude)	N 43.647693, W 96.223727

Start date of operations (initial start date)	Date isobutanol production began: May 23, 2012
Number of processing steps	6 steps
Description of the product or the product component that the certification covers, including, if applicable, the specification of the mass of the certified component related to the total product.	Iso-butanol
Annual throughput of previous 12 months <i>(Can be moved to appendix if certain information is confidential)</i>	
Feedstock Input (Metric Ton)	0 (due to pandemic shutdown) Any production was of non-RSB ethanol in early 2020 rather than isobutanol.
Final/Primary Product Output (Metric Ton)	0 (due to pandemic shutdown) Any production was of non-RSB ethanol in early 2020 rather than isobutanol.
Intermediate/by-product Output (Metric Ton)	0 (due to pandemic shutdown) Any production was of non-RSB ethanol in early 2020 rather than isobutanol.
% output yield compared to input material (total output/total input)	0 (due to pandemic shutdown) Any production was of non-RSB ethanol in early 2020 rather than isobutanol.
Amount sold as RSB certified (tons)	0 (due to pandemic shutdown) Any production was of ethanol in early 2020 rather than isobutanol.

***Note: the Gevo industrial facility was closed for 2020 due to COVID pandemic restrictions. There was no sustainable input or output. There were two small batches of isobutanol started in October 2020 but they are still in process and will not be finished until April 2021 so it is impossible to gather accurate yield data. The batches of isobutanol were not made with sustainable corn.**

1.4 GHG Intensity: In Appendix, Not Public

2.0 EVALUATION PLANNING & PROCESS

2.1 Audit Team

Auditor Name:	Robert Earley	Auditor role:	Lead Auditor
Qualifications: Robert Earley is a staff auditor and verifier at SCS Global Services. He is a certified auditor of RSB, ISCC and Bonsucro certifications, and a certified verifier of the California Low Carbon Fuel Standard, and has been trained in ISO 9001:2015 auditing. Additionally, he is currently an expert consultant on UN, EU, charitable foundation and NGO projects focused on sustainable transportation and air pollution. Prior to becoming an auditor, Robert was the Transport Program Manager of Manila-based Clean Air Asia, promoting clean and efficient freight and logistics across Asia, and			

before that was the Director of the Clean Transportation Program at the Innovation Center for Energy and Transportation (iCET), which developed standards for lifecycle GHG emissions assessment for biofuels in China, and which became the first member of the RSB in China. He is currently on the board of the Beijing Energy Network as well as the China Carbon Forum. Mr. Earley, who has lived in China since 2005 and is fluent in Mandarin Chinese, studied environmental science at the University of Calgary and Urban and Regional Planning at the University of Waterloo in Canada. His coursework at the University of Calgary included impacts of agriculture and conservation in agricultural areas in southern Alberta

Auditor Name:	Justin Richter	Auditor role:	GHG Verifier
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Qualifications: Dr. Richter is a Life Cycle Analysis practitioner and Supply Chain researcher in the areas of biofuels, renewable energy, advanced products, and social impacts. He holds GHG certification from ISCC. Dr. Richter has received a Ph.D. in Environmental and Ecological Engineering from Purdue University (West Lafayette, IN, USA).

2.2 Evaluation Schedule and Extent of Audit

2.2.1 RSB Audit types Matrix

	Low risk class	Medium risk class	High risk class
Certificate validity	5 years	3 years	2 year
Main audit	Every 5 years	Every 3 years	Every 2 year
Surveillance audit	Annual	Annual	Annual

2.2.2 Methodology and Strategies Employed

SCS deploys interdisciplinary teams with expertise in agriculture, ecology, forestry, social sciences, natural resource economics, and other relevant fields to assess an Operator’s compliance to RSB standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of site and facility types, observation of implementation of management plans and policies, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant site observations, stakeholder comments, and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section.

2.2.3 Evaluation Itinerary and Activities

Time	Element/Activity	Personnel Involved
<i>Day 1</i> <i>13 Jan</i> <i>2021</i>	Online – Microsoft Teams	
9:00 a.m.	Opening Meeting and General Requirements <ul style="list-style-type: none"> – Introduction to certification program and assessment process to on-site staff – Review of scheduled activities – Review of RSB Procedures; confirm roles, responsibilities and processes – Confirmation of scope of products to be certified – Clarification of all suppliers; i.e. farms, blending, transportation, storage – Client to outline production process and overall process flow – Review site map(s) – Update from client and any social or environmental changes to the operation – Follow up on implementation of any corrective action plans from desk audit or previous initial field audit 	Management
10:00 a.m.	Document Review: Participating Operator/ Standards Checklist <ul style="list-style-type: none"> – Review of training procedures and records – Review of Grievance Mechanism – Review of traceability method and implementation (including acquiring, handling, and forwarding sustainable material) – Analysis of material balances and records – Review of records – Review of GHG inputs – Communications and Claims 	
1:00 p.m.	End of Day 1	

Time	Element/Activity	Personnel
<i>Day 2</i> <i>14 Jan</i> <i>2021</i>	Online – TBD – Microsoft Teams / Zoom	
7:00	Document Review: Compliance with Principles and Criteria – Surveillance Audit P&C Checklist with USA Indicators <p>Principle 1:</p> <ul style="list-style-type: none"> – Review of all relevant business licenses – Review of land and water use permits <p>Principle 2:</p> <ul style="list-style-type: none"> – Review screening tool – Review environmental and social management plan 	Management

	<ul style="list-style-type: none"> - Review impact assessments, if applicable <p>Principle 7: Conservation values, ecosystems, buffers, water rights</p> <p>Principle 8: <ul style="list-style-type: none"> - Soil quality practices, measurements, process in ESMP </p> <p>Principle 9: <ul style="list-style-type: none"> - Water permits, water management in ESMP </p> <p>Principle 10: <ul style="list-style-type: none"> - Air permits, air management in ESMP </p> <p>Principle 11: <ul style="list-style-type: none"> - Use of technology: GMO, fertilizers, pesticides - Integrated waste management - Resource and energy usage, and efficiency </p>	
4:45	<ul style="list-style-type: none"> - End of day Summary 	
	End of Day 2	

<i>Day 3</i> <i>15 Jan</i> <i>2021</i>	Circle F Farm Teams / Zoom - TBD	
7:00 a.m.	<p>Opening Meeting and General Requirements</p> <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff - Confirm roles, responsibilities and processes - Confirmation of scope of products to be certified 	Farm Management
8:30	<p>Document Review: Participating Operator/ Standards Checklist</p> <ul style="list-style-type: none"> - Confirm fields and production - Confirm origin of crops - Confirm cultivation dates for compliance with Jan 2008 rule - Review of feedstock specific requirements, if applicable 	Farm Management
11:45	<p>Report Writing</p> <ul style="list-style-type: none"> - Auditor(s) take time to consolidate notes and confirm audit findings 	Auditor
12:30	<p>Findings</p> <ul style="list-style-type: none"> - Presentation of all non-compliances and opportunities for improvement 	Farm Management
	End of Day 3	

<i>Day 4</i> <i>18 Jan</i> <i>2020</i>	Online – MS Teams or Zoom - TBD	
8:00 a.m.	Closing Meeting <ul style="list-style-type: none"> - Presentation of General audit finding - Presentation of all non-compliances and opportunities for improvement - Fix timetables for corrective actions - Reiterate SCS appeal policy - Questions 	Management
	End of Audit	

2.3 Documentation Submitted by Operator

1.3 General Requirements.docx	Gevo policy on complaints
1.4 General Requirements.docx (General Information)	Gevo whistleblower policy
1.5 Consecutive Stages of Operation	Gevo_January 2021_Investor Relationsv2.pdf
RSB Risk Assessment Tool Version 3.2.1	Gevo Press release
2.4 Management representative	Gevo Org Chart 1.6.2021
2.a.6 ESMP v9	Agri Org Chart 1.1.2021
Feikema Certification 2019.kmz	Feikema RSB Contract Signed.pdf
ISCC and RSB Certification Overview March 2020	Form 10-K Annual Report, US Securities and Exchange Commission, FY2018
Sustainability Quality Management System v1.5	Agri-energy P2PR Certification 2019
Agri-Energy Employee Handbook	Agri-Energy Pollution Prevention Plan 6-26-2020
Gevo Employee Handbook 5-18-2015	December 2020 GEVO Monthly water report to city
MCAN December 20 2019	Threatened Species Info V2
RSB Screening Tool January 2021	

2.4 Evaluation of Management System

2.4.1 Capacity of the participating operator to implement its management systems

Confidential information – see Annex 2

The operator is highly competent and dedicates adequate resources to its implementation of the RSB standard.

2.4.2 Evaluation of RSB compliance claims and use of RSB trademarks

For Advanced Products, signed document specifying claims approved by RSB:	Not applicable. No RSB compliant material has been produced.
If other claims are used, are they in line with scope and allowed claims per RSB-PRO-50-001?	
Does Operator use RSB trademarks on off-product or on-product claims?	Not applicable.

2.5 Stakeholder Consultation Process (for Main audits)

In accordance with SCS and RSB protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. The primary purpose of such consultation is to solicit input from affected parties as to the strengths and weaknesses of the Participating Operator’s management system and operations, relative to the standard, and the nature of the interaction between the company and the surrounding communities.

Principal stakeholder groups are identified based upon the certification scope of the participating operator.

Stakeholder consultation activities are organized according to the requirements of the RSB. The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

3.0 RISK ASSESSMENT RESULTS

Highest Risk Class will Apply for the Participating Operator

Site	Based on the most recent self-risk assessment the PO’s risk assessment results are (The number):	Corresponding risk class (low, medium, high):	Date of risk assessment (must be no older than 3 months from the audit date)	Auditor’s assessment of Operator’s risk
Agri-Energy LLC	6	Low	November 2020	Auditor agrees with assessment

4.0 RESULTS OF THE EVALUATION

4.1 Process of Determining Compliance

4.1.1 Structure of Standard and Degrees of Non-Compliance

RSB-accredited biofuel standards consist of a three-level hierarchy: the principle, the criteria that correspond to that principle, and then the performance indicators that elaborate upon each criterion. Consistent with SCS Sustainable Biofuels Program evaluation protocols, the team collectively determines whether or not the subject operation is in compliance with every applicable indicator of the relevant sustainable biofuel standard. Each non-compliance must be evaluated to determine whether it constitutes a major or minor non-compliance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in non-compliance. The team therefore must use their collective judgment to assess each criterion and determine if the Operator is in compliance. If the Operator is determined to be in non-compliance at the criterion level, then at least one of the applicable indicators must be in major non-compliance.

4.1.2 Interpretations of Findings

Major Non-compliances, either alone or in combination with non-compliances of other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant RSB Criterion. These non-compliances must be resolved or closed out before a certificate can be awarded. If Major NCs arise after an operation is certified, the timeframe for correcting these non-compliances is typically no more than three months. Certification is contingent on the operator’s response to the NCs within the stipulated time frame.

Minor Non-compliances are typically limited in scale or can be characterized as an unusual lapse in the system. Most minor NCs are the result of a non-conformance at the indicator-level. Non-compliances must be closed out within a specified time period of award of the certificate.

Opportunity for Improvement is an observation made which does not fully impact compliance but could potentially affect the PO’s ability to comply with RSB requirements in the future.

4.1.3 Major Non-compliances

<input checked="" type="checkbox"/>	No major NCs were issued to the Operator during the evaluation. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
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<input type="checkbox"/>	Major NCs were issued to the Operator during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major NCs were issued to the Operator during the evaluation and the Operator has not yet satisfactorily closed all major NCs.

4.1.4 Non-compliances and Current Status

Summary of Non-compliances and Current Status				
Non-compliance Number	Type of Non-compliance	Relevant RSB Standard & Indicator No.	Summary of Finding and Evidence Collected	Status of Non-compliance (Open/Closed)
2020-1	Observation	Checklist 1.11, Principle 2.c.1.1, Principle 4.h.1	In internal audit, staff were not found to be adequately aware of the grievance system. Check at next audit to observe understanding. Lack of grievances may be due to lack of knowledge.	Open
2020-2	Observation	Checklist 9.3.4	Meters were not calibrated due to plant shutdown. Calibrations should be checked at next audit.	Open
2020-3	Observation	Principle 10.b.2	Check for changes in policy in Rock country, and opportunities for burning reduction.	Open

5.0 CERTIFICATION DECISION

Certification Recommendation		
For Surveillance Audits: Operator is to continue as an RSB certified Participating Operator subject to the minor non-compliances stated in Section 4.2.5.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Responsible Biofuels Program evaluation protocols. If certification is recommended, the Operator has satisfactorily demonstrated the following without exception:		
Operator has addressed any Major NC(s) assigned during the evaluation.	Yes <input type="checkbox"/> No <input type="checkbox"/> No Major NCs issued <input checked="" type="checkbox"/>	
Operator has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards are met over the sites and facilities covered by the scope of the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Operator has demonstrated that the described system of management is being implemented consistently over the sites and facilities covered by the scope of the certificate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments and/or details of any issue which was difficult and/or impossible to evaluate:	Auditing outdoor conditions at Circle F farms was difficult due to remote audit and harsh winter conditions where snow covered most of the farm.	
To be completed by Certification Decision-Making Entity	Technical Review by: If different to decision-maker	Matthew Rudolf
	Certification decision:	Continued certification under the standards listed in section 1.2.2
	Certification decision by:	Robert Earley
	Date of decision: For initial or continued certification	30 April 2021
	Surveillance schedule:	Before 13 January 2022 Notes: The certification period was lengthened to expire in 2025 due to a reduced risk rating. (Changed 28 May 2021)