

Certification Evaluation Report

Roundtable on Sustainable Biomaterials

Gevo Inc.

SCS Certificate Code: SCS-RSB/PC-0034

Luverne, MN
Karen O'Brien
Gevo.com

CERTIFIED	EXPIRATION
31 January 2020	30 January 2023

DATE(S) OF AUDIT
December 18, 2019
DATE OF LAST UPDATE
January 31, 2020

SCS Contact:

Matthew Rudolf | Manager, Biofuels
+1.919.533.4886 (direct) mrudolf@scsglobalservices.com

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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. 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 **(Can be moved to appendix if certain information is confidential)**

Organization name	Gevo, Inc.		
Contact person	Karen O’Brien, Sustainability		
Address	345 Inverness Drive South Bldg C Ste 310 Englewood, CO 80112 USA	Telephone	(720) 267-8629
		Fax	(no fax number)
		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.		
Contact person	Shawn Feikema		
Address	1735 120th Ave	Telephone	507 283-9215
	Luverne, MN 56156	Fax	507 283-2795
	USA	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 checked="" type="checkbox"/> Initial Assessment <input type="checkbox"/> Re-certification <input type="checkbox"/> Follow-Up to NCs	<input 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 should appear/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, 1 PT, 4 seasonal Gevo: 25 FT	
Number of women workers	Circle F Farms: 0 Gevo: 8 female workers	

AGRICULTURAL SITES OR FEEDSTOCK PRODUCTION SITES		
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 farms included in certification scope	One			
Geographic location:	Farm/Entity	Location (Lat. - Long.)	Area (ha)	Area Planted (ha)
	1735 120th Ave Luverne, MN 56156 USA	N 43.736541 W 96.232834		2,552
NEW Please request shapefiles of all farms				
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)	Not provided			
Total Planted Area (ha)	2552 hectares			
Total area set aside for conservation purposes (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)	509,497.28 bushels (12,943.52 metric tons) in 2018; 100,725 bushels (2,558.58 metric tons) in 2019			
Feedstock Production counted as RSB in last calendar year (tons)	0 metric tons			
Amount sold as RSB certified in last calendar year (tons)	0 metric tons			
Amount of RSB material in stock at end of last calendar year (tons)	0 metric tons			

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 (<i>Latitude & Longitude</i>)	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 (Can be moved to appendix if certain information is confidential)	
Feedstock Input (Metric Ton)	Values not provided as corn has been used to produce ethanol rather than isobutanol.
Final/Primary Product Output (Metric Ton)	Values not provided as corn has been used to produce ethanol rather than isobutanol.
Intermediate/by-product Output (Metric Ton) (DDG, DDGS, Corn oil, Corn syrup)	Values not provided as corn has been used to produce ethanol rather than isobutanol.
% output yield compared to input material (total output/total input)	Values not provided as corn has been used to produce ethanol rather than isobutanol.
Amount sold as RSB certified (tons)	0 tons in 2019

1.3 GHG Intensity: In Appendix, Not Public

1.4 Standards Used

Applicable RSB-Accredited Standards

Title	Version
RSB Principles & Criteria (RSB-STD-01-001)	3.0
RSB Standard for Traceability (RSB-STD-20-001)	3.1
RSB Standard for Participating Operators (RSB-STD-30-001)	3.1
Standard-for-Risk-Management (RSB-STD-60-001)	3.1
RSB GHG Calculation Methodology (RSB-STD-01-003-01)	2.3
RSB Procedure on Communication and Claims (RSB-PRO-50-001)	3.2
All standards employed are available on the websites of the Roundtable on Sustainable Biomaterials (http://rsb.org/sustainability/rsb-sustainability-standards/). Standards are also available, upon request, from SCS Global Services (http://www.scsglobalservices.com/).	

2.0 EVALUATION PLANNING & PROCESS

2.1 Documentation Submitted by Operator

ESMP, v. 8	Chemical – Input Usage Analyzer Feikema Farms
RSB-GUI-01-002-02_Screening-Tool 2019-12-02	Corn Yield Summary
RSB Product Sales.xlsx	Feikema Farms Contract 2019-11-18
Sustainable Product Tracking.xlsx	Feikema Inputs.xlsx

2.2 Audit Type and Determination

The following table summarizes the audit types for RSB Audits:

	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

2.3 Audit Team

2.3.1 Determination of Audit Team

- Desk audits shall always be conducted by at minimum one (1) international lead auditor. The lead auditor appointed may include additional auditors and/or technical experts in the audit team if this is required by the extent of the audit.
- Field audits shall always be led by one (1) international lead auditor.
- The lead auditor appointed shall include at minimum one (1) local auditor in the audit team. The lead auditor appointed may include additional auditors and/or technical experts in the audit team if this is required by the extent of the audit.
- For field audits of participating operators in High Risk class shall always the lead auditor appointed shall appoint at minimum
 - one (1) local auditor and
 - one (1) technical expert on social issues to evaluate compliance with social requirements and the risk of non-compliance due to social issues and
 - one (1) technical expert on environmental issues to evaluate compliance with environmental requirements and the risk of non-compliance due to environmental issues.
 - The lead auditor appointed may include additional auditors and/or technical experts in the audit team if this is required by the extent of the audit.

2.3.2 Audit Team

Auditor Name:	John Shideler	Auditor role:	Lead Auditor
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Qualifications: Qualifications: Mr. John Shideler is an environmental professional with 20+ years’ experience auditing management systems and greenhouse gas statements for a number of accredited certification bodies. He is currently certified as a greenhouse gas lead verifier by the California Air Resources Board. He is an experienced ISO 14001/OHSAS 18001 lead auditor and previously held lead auditor certification for auditing Responsible Care management systems for members and partners in the chemical manufacturing industry. He represents his company, Futurepast: Inc., in CAAFI, the Commercial Aviation Alternative Fuel Initiative. He has provided consulting services on the topic of sustainability of aviation biofuels to the Alternative Fuels Project Manager in the Federal Aviation Administration’s Office of Environment and Energy. He led Futurepast’s contribution to a report published by the National Academy of Sciences Transportation Research Board on “Tracking Alternative Jet Fuel” (ACRP 02-65, 2016).

As a US expert, he has contributed to the writing of several greenhouse gas standards (ISO 14064-3, ISO 14065, ISO 14066, ISO 14067, and ISO 14069). He is the current chair of ISO Technical Committee 207 Subcommittee 4 on Environmental Performance Evaluation, and he served as ISO TC207 liaison to ISO Project Committee 248 which published ISO 13065, Sustainability criteria for bioenergy. He earned a PhD degree in history at the University of California, Berkeley.

2.4 Evaluation Schedule and Extent of Audit

2.4.1 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	Medium
Disputes or prior Non-compliances	None
Changes in scope since last evaluation	None – Initial certification audit
Total number of compliance claims	None

2.4.2 Evaluation Itinerary and Activities

Time	Element/Activity	Personnel Involved
Tuesday, 17 Dec. 2019	Gevo/Agri Energy Biofuel Plant in Luverne, MN	
<i>Day 1</i> 8:30	Arrive at Gevo/Agri Plant in Luverne and complete safety orientation	EHS Manager
8:45	Opening Meeting - Introduction to certification program and assessment process to on-site staff - Review of scheduled activities	Plant Management, Gevo Representative

	<ul style="list-style-type: none"> - Review of RSB Procedures; confirm roles, responsibilities and processes. - Confirmation of scope of products to be certified and any product groupings. and clarification of all suppliers; farms, blending, transportation, storage - Client to outline production process and overall process flow. - 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 	
9:30	<p>Document Review</p> <ul style="list-style-type: none"> - Review site map(s) - Review documentation of historic land use/land tenure, legal tenure - Review of all relevant business licenses - Review of land and water use permits - Review of tax documents - Analysis of material balances and records - Resource and energy usage, conservation and Efficiency - Air and waste management; water use and wastewater management 	Plant Management, Gevo Representative
10:30	<p>Site Walk-through</p> <ul style="list-style-type: none"> - Observe ponds/tanks/reservoir(s) - Observe feed storage and feeding procedures - Observe chemical storage and disposal - Observe sludge repository or disposal - Observe other critical control points 	Production, Warehouseman, and Post Production Personnel
12:00	<p>Lunch Break</p> <ul style="list-style-type: none"> - Working lunch off site 	
13:00	<p>Agri/Gevo Worker Interviews</p> <ul style="list-style-type: none"> - Interviews with key staff by risk category in absence of supervisors - Provide assurance for confidentiality 	Auditor will identify selected workers at the time of the site visit.
14:00	<p>Human Resources</p> <ul style="list-style-type: none"> - Review of contracts, policies, and records of training and grievances - Occupational health and safety training records - Complaints, living wage, equality issues - Records for freedom of association mechanism 	Plant Management, Gevo Representative
15:00	<p>Risk Management</p> <ul style="list-style-type: none"> - Evaluate how risk is taken into account 	Plant Management, Gevo representative
15:30	<p>Acquiring and Handling Certified Material</p> <ul style="list-style-type: none"> - Evaluate traceability and communication of claims - Understand storage of feedstock and certified material 	Plant Management, Gevo representative
16:15	<p>Product Sales</p> <ul style="list-style-type: none"> - Complete checklist tab 	Plant Management, Gevo representative
16:40	<p>Report Writing</p>	Auditor

	<ul style="list-style-type: none"> - Auditor(s) take time to consolidate notes and confirm audit findings 	
17:00	First Day Debriefing <ul style="list-style-type: none"> - Presentation of any non-compliances and opportunities for improvement - Respond to questions 	Plant Management, Gevo representative
17:30	Auditor Departs for the Day	Auditor

Time	Element/Activity	Personnel Involved
Wednesday, 18 Dec. 2019	Visit to Circle F Farms, return to Gevo/ Agri Energy Biofuel Plant in Luverne, MN	
<i>Day 2</i> 8:00	Visit to Circle F Farms <ul style="list-style-type: none"> - Introduction to certification program and assessment process - Visit of the farm, including boundary areas with the Northern Tallgrass Prairie National Wildlife Refuge and Blue Mounds State Park. - Review RSB Principles and Criteria, including, but not limited to: <ul style="list-style-type: none"> o Human and labor rights o Conservation o Soil o Water o Air quality o Use of technology, inputs, and management of waste - Interview farm employees - Closing discussion with Shawn Feikema 	Mr. Shawn Feikema, Gevo representative
11:00	Return to Plant <ul style="list-style-type: none"> - Lunch 	
12:00	Conformity with Participating Operator Requirements <ul style="list-style-type: none"> - Complete checklist tab 	Plant Management, Gevo representative
13:00	Interviews with neighbouring community members <ul style="list-style-type: none"> - Meet with Doug Bos at Rock County Land Management (13:00) - Meet with Mayor Baustian at City Hall (13:30) - Interview neighbors of Agri Plant 	Auditor
15:00	Conformity with Participating Operator Requirements <ul style="list-style-type: none"> - Complete checklist tab 	Plant Management, Gevo representative
15:30	Verification of GHG Data Inputs <ul style="list-style-type: none"> - Production data provided to SCS Global 	Plant Management, Gevo representative

16:30	Report Writing Auditor(s) take time to consolidate notes and confirm audit findings	Auditor
17:00	Closing Meeting <ul style="list-style-type: none"> - Presentation of General audit findings - Presentation of all non-compliances and opportunities for improvement - Fix timetables for corrective actions - Reiterate SCS appeal policy - Respond to questions 	Plant Management, Gevo representative
17:30	Auditor Departs Facility	

2.5 Evaluation of Management System

2.5.1 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.

Interviews with Agri-Energy LLC personnel were conducted in Luverne, MN, on 17-18 December. A site visit to the Circle F Farms and stakeholder interviews were conducted on 18 December.

2.5.2 Capacity of the participating operator to implement its management systems

During the audit, Agri-Energy LLC personnel demonstrated a thorough knowledge of RSB requirements and presented detailed documentation describing procedures for ensuring compliance. Please see Appendix 2 for a detailed description of Agri-Energy’s management system.

2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks

The RSB short claim (claim to be used on sustainability declarations), as defined in RSB-PRO-50-001	All claims will be reviewed and approved by RSB before being used
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Any other claims used as per RSB-PRO-50-001	All claims will be reviewed and approved by RSB before being used
Does Operator use RSB trademarks on off-product or on-product claims?	Not applicable.

2.6 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.

2.6.1 Summary of Stakeholder Comments and Responses (for Main audits)

Stakeholder Comments	SCS Response
Economic Concerns	
No economic concerns expressed.	None required.
Social Concerns	
No social concerns expressed.	None required.
Environmental Concerns	
Food vs. fuel	A national non-governmental organization had no specific comments related to the Agri-Energy LLC biorefinery. However, he expressed a general concern that using land that could be available for growing food crops was used to produce starch and sugars for ethanol production.

3.0 RISK ASSESSMENT RESULTS

Based on the most recent self-risk assessment (no older than 3 months from the audit date) the PO’s risk assessment results are:	Risk class as assessed by auditor
12 (Medium)	Medium

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.
<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.
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4.1.4 Non-compliances and Current Status

Action Plan for minor non-conformities is due three months from issuance.

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)
2019-1	Observation	PO Checklist 1.4	Certification scope document does not indicate the correct scope. Additionally, information required on farm in scope is missing.	Open

5.0 CERTIFICATION DECISION

Certification Recommendation		
For Initial and Re-certifications: Operator to be awarded RSB certification subject to the minor non-compliances stated in Section 4.2.5.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
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 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:		
To be completed by Certification Decision-Making Entity	Technical Review by: If different to decision-maker	Inna Kitaychik
	Certification decision:	Gevo Inc. complies with RSB standards listed in Section 1.4
	Certification decision by:	Inna Kitaychik
	Date of decision: For initial or continued certification	31 January 2020
	Surveillance schedule:	1 st surveillance audit in January 2021
	Notes:	

Sub Certificate Codes (if applicable)

Legal Entity/Operational Site	Sub-Certificate Code