

Certification Evaluation Report

Roundtable on Sustainable Biomaterials
INEOS Styrolution Belgium NV

SCS Certificate Code: SCS-RSB-PC-0035

Scheldelaan 600, 2040 Antwerpen 4 – Belgium

Daniela Wallinda

www.ineos-styrolution.com

CERTIFIED	EXPIRATION
21 January 2020	20 January 2025

DATE(S) OF AUDIT
November 18-19, 2019
DATE OF LAST UPDATE
21 January 2020

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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	INEOS Styrolution Belgium NV		
Operator Number	2114		
Contact person	Daniela Wallinda		
Address	Scheldelaan 600, 2040 Antwerpen 4 - Belgium	Telephone	+49 69 / 509550-1202
		Fax	//
		e-mail	daniela.wallinda@ineos.com
		Website	www.ineos-styrolution.com

1.1.2 Additional Parties Involved

Limited distributors in the scope of the certificate:

	Entity	Coordinates	Address
1	Ineos Styrolution Europe GmbH HRB 97351	50.11633, 8.663803	Mainzer Landstrasse 50, 60325 Frankfurt Am Main - Germany
2	INEOS Styrolution Group GmbH HRB 91762	50.111190, 8.663809	Mainzer Landstraße 50 60325 Frankfurt am Main Germany
3	INEOS Styrolution France Services S.A.S 537 990 020	48.871650, 2.307882	95 Rue la Boétie 75008 Paris, France
4	INEOS Styrolution Belgium Services bvba 501681129	51.236952, 4.321031	Nieuwe Weg 1·Haven 1053 2070 Zwijndrecht, Belgium
5	INEOS Styrolution Iberia S.L. B2316724	41.394130, 2.133170	Ronda General Mitre 28-30 08017 Barcelona, Spain
6	INEOS Styrolution Italia S.r.l. R.E.A. MI-2055888	45.478523, 9.103009	con Socio Unico Via Caldera 21 20153 Milano, Italy
7	INEOS Styrolution Kimyasal Ürünler Ticaret Limited Şirketi, Sicil No. 809630	41.109759, 29.022072	Büyükdere Cad. Meydan Sok. Spring Giz Plaza K. 13 N.11 Maslak Sariyer, Istanbul, Turkey
8	INEOS Styrolution Netherlands B.V. 54164583	52.340531, 4.874475	Strawinskylaan 411 1077 Amsterdam, Netherlands

9	INEOS Styrolution OOO 50393B-7/2012	55.742181, 37.627728	18 Pyatnitskaya St. 115035 Moscow, Russia
10	INEOS Styrolution Poland Sp. z o.o NIP 536 178 46 52	52.184260, 21.001004	ul. Wołoska 9 02-583 Warszawa, Poland
11	INEOS Styrolution UK Ltd 7798636	53.479446, - 2.250074	C/O DWF LLP 1 Scott Place, 2 Hardman Street, M3 3AA Manchester United Kingdom
12	INEOS Styrolution APAC Pte Ltd 200818085M	1.300514, 103.837638	111 Somerset Road 238164 #14-16 to 21 Triple One Somerset, Singapore
13	INEOS Styrolution Hong Kong Company Ltd 39695719	22.274642, 114.171628	Level 54, Hopewell Centre 183 Queen's Road East Hong Kong, China
14	INEOS Styrolution Polymers (Shanghai) Co., Ltd. 310000400632891	31.256833, 121.421446	25F, Block B, Central Towers, No. 567 Langao Road 200333 Putuo District, Shanghai, China
15	INEOS Styrolution Vietnam Co., Ltd 11043001066	21.032153, 105.812428	54 Lieu Giai, #1103, East Tower, 11 Floor, Lotte Centre, Ba Dinh, Hanoi, Vietnam
16	INEOS Styrolution APAC Japan Branch 0111-03-004342	35.691891, 139.695393	Shinjuku Center Building 35F Tokyo 163-0635 1-25-1 Nishi-Shinjuku, Shinjuku, Japan
17	INEOS Styrolution America LLC 26-0768059	A) 41.771789, - 88.219512 B) 41.413237, - 88.196189 C) 34.629207, -87.017396 D) 29.602738, -95.016721 E) 29.359350, - 94.929402	A) 4245 Meridian Parkway, Suite 151. Aurora, IL 60504, USA B) 25846 SW Frontage Rd, Channahon, IL 60410, USA C) 950 Nova Chemical Blvd, Decatur, AL 35601, USA D) 12222 Port Road, Pasadena, TX 77507, USA E) 2800 FM 519, La Marque (Texas City), TX 77568, USA
18	INEOS Styrolution Canada Ltd. 683170-2	42.941024, - 82.415801	872 Tashmoo Avenue ON N7T 8A3 Sarnia, Canada
19	INEOS Styrolution Mexicana S.A. de C.V. 431374-1	19.388326, - 99.174586	Ave. Insurgentes Sur No. 859, Piso 11, Oficina 1102, C.P. 03810 Ciudad de México Colonia Nápoles, México
20	INEOS Styrolution Servicios S.A. de C.V. 396458-1	19.388326, - 99.174586	Ave. Insurgentes Sur No. 859, Piso 11, Oficina 1102 C.P. 03810 Ciudad de México Colonia Nápoles, México

21	INEOS Styrolution do Brasil Polímeros Ltda. 35224585222	-23.602649, -46.692675	Rua Quintana, 887 – 3º. andar - salas 33/34, CEP 04569-011 Cidade Monções, Sao Paulo, SP- Brazil
22	INEOS Styrolution Switzerland SA	46.455448, 6.332617	Avenue des Uttins 3 1180 Rolle, Switzerland

TRADERS or WAREHOUSES (if in scope)	
1. Name	Schmidt Belgium
Location/City	Moerstraat 8, haven 550 2040 Antwerpen, Belgium
Geographic location (Latitude & Longitude)	51.308125, 4.334303
Material stored:	Styrene-butadiene copolymer / Polystyrene
2. Name	De Rijke N.V.
Location/City	Kruisweg 8, 2040 Antwerpen, Belgium
Geographic location (Latitude & Longitude)	51.316407, 4.335164
Material stored:	Product: Styrene-butadiene copolymer / Polystyrene

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:	Processing Unit, Traders, Warehouses	
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:		

Note 1: If the scope is different, please contact SCS.

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.

Total workers covered by scope of certification:	328 (Processing Unit)
Number of women workers	20

INDUSTRIAL FACILITIES	
Name of Facility	INEOS Styrolution Belgium NV
Type	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Vegetable oil Extraction <input type="checkbox"/> Biofuel Production and/or Distribution <input checked="" type="checkbox"/> Other, please explain here: chemical synthesis of monomers, copolymers and polymers.
Location/City	Antwerpen, Belgium
Geographic location (Latitude & Longitude)	51.359259, 4.268334
Start date of operations (initial start date)	Before October 2015
Number of processing steps	ETHYLENE+BENZENE>EB >(2 steps, reaction + distillation) // EB>STYRENE (2 steps - dehydrogenation which includes downstream separation) // STYRENE > PS (2 steps, polymerisation reaction, extrusion + granulation).
Product or the product components that the certification covers	Styrene, Styrene-butadiene copolymer, Ethylene-benzene copolymer, Polystyrene

1.3 GHG Intensity

Advanced products from bio-based feedstocks			
Advanced Product:	Styrene	GHG:	Styrene monomer (from benzene and ethylene): -1,179.0 kg CO ₂ e/tonne
Advanced Product:	Styrene-butadiene copolymer	GHG:	Styrene-butadiene copolymer (SBC) (from styrene monomer): 741.3 kg CO ₂ e/tonne Styrene-butadiene copolymer (SBC) (from benzene and ethylene): 451.3 kg CO ₂ e/tonne'
Advanced Product:	Polystyrene	GHG:	Polystyrene (HIPS) (from styrene monomer): -497.5 kg CO ₂ e/tonne -Polystyrene (HIPS) (from benzene and ethylene): -635.7 kg CO ₂ e/tonne -Polystyrene (GPPS) (from styrene monomer): -772.6 kg CO ₂ e/tonne -Polystyrene (GPPS) (from benzene and ethylene): -1,112.0 kg CO ₂ e/tonne

Notes	The above values hold for <ul style="list-style-type: none"> • SBC 684D Styrolux B60 at 100% substitution • GPPS 158N B100 at 100% substitution • HIPS 486N B90 at 100% substitution
For advanced products from bio-based feedstocks: if and how the CO2 uptake was accounted for (see RSB-STD-02-001)	The CO2 uptake was accounted for in the incoming GHG values for the feedstocks.

1.4 Advanced Product Information

If the feedstock for a batch of RSB certified Advanced Product is not wholly but only partly RSB-certified: state the amount of certified feedstock in relation to the total mass of the feedstock for the appropriate category:	
For Category III products:	
State the amount of primary fossil resources saved by the input of eligible feedstock in the production system	N/A first certification. Declared to be at least 25% in Procedures.

1.5 Standards Used

Applicable RSB-Accredited Standards

Title	Version
RSB Principles & Criteria (RSB-STD-01-001)	3.0
RSB Chain of Custody (RSB-STD-20-001)	3.1
RSB Standard for Participating Operators (RSB-STD-30-001)	3.1
RSB 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)	3.3
RSB Standard for Advanced Products (RSB-STD-02-001)	2.0
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

Manual for RSB Management: 191108_ESMP_INEOS Styrolution.pdf and attached procedures mentioned in this table	INEOS STYROSOLUTION_Legal Entities in Scope_V3
Chain of custody and Mass balance, including procedures for acquiring, handling and forwarding: 20191118-19 INEOS Styrolution Belgium - Mass Balance Audit.pptx 20191002_SAP Docu_SEQ test Mass balance project.pdf Chain of Custody Concept_INEOS Styrolution_NOV 2019_NEW.pdf	Process description and data: Manual distracting planned and actual consumption out of SAP.docx Process Description_Consumption Deviation_Corrective Measures_V3.pdf PST consumpties mass balance okt19.xlsx PST okt19.xls
RSB Self-risk assessment Self-Risk-assessment_RSB_03052019_Risk score 3.xlsx	GHG Calculator 191108 MBP Calculation - BMB B & E to SBC and HIPS.xlsx 191108 MBP Calculation - BMB SM to SBC and HIPS.xlsx Critical review statement.pdf
RSB screening tool: RSB-GUI-01-002-02_Screening-Tool.pdf	Stakeholders list: INEOS Styrolution Belgium NV - MBP - Stakeholder List - rev1
2019118_Claims and communication_rev_NEW.pdf	De Rijke warehouse: -PYTHAGORAS_Bestaande situatie.pyt - A0 – Overzichtplan.pdf (layout) -De Rijke nv Uittreksel KBO – 0407208275.pdf (chamber of commerce) -AR - Bijlage V organogram Antwerpen op- en overslag aug 2019.pptx (organigramme) Schmidt warehouse: -grondplan.jpg (layout) -kssbe53_20180227_085224 (chamber of commerce) -Organigram Silostation v2019_11.pptx (organigramme)

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:	Marinka Vignali	Auditor role:	Lead auditor
<p>Qualifications: Marinka is a certified Auditor against 2 EU approved voluntary schemes (RSB EU and ISCC EU), 2 global sustainability schemes (RSPO Chain of custody, ISCC PLUS, RSB) and Italian national scheme with many years of experience in biofuels sector, started in 2011. From 2017 lead auditor under Emission Trading Scheme. Previously she has worked at European Commission for 9 years, at DG JRC -Renewable Energy Unit, dealing with biofuels from 2006. She has received a master’s in chemical engineering at Università degli Studi di Pisa (Pisa, Italy) and a PhD in Chemistry at University of Limerick (Limerick, Ireland).</p>			
Auditor Name:	Maite Lasa	Auditor role:	Auditor
<p>Qualifications: Maite is a certified Auditor against sustainability schemes including RSB an Bonsucro. Previously she has worked as a sustainability consultant in renewable energy and in climate change mitigation, and in the biofuels sector particularly in the production of energy crops for biodiesel production. She has received a master’s in public administration focused in energy and environment at the University of Columbia (New York, USA).</p>			
Auditor Name:	Brent Riffel	Auditor role:	Auditor and GHG expert
<p>Qualifications: Mr. Riffel is an expert in life cycle assessment, fuel and chemical certification and verification and corporate sustainability at SCS Global Services. He has worked as a greenhouse gas consultant for 12 years and greenhouse gas verification for 2 years. His experience includes carbon footprint assessments of biochemical and petrochemicals, lubricants, biofuels, agricultural commodities, solar panels, electricity, industrial mats and peat products. Mr. Riffel has a M.S. from the Institute of Transportation Studies at UC Davis and a B.A. in Chemistry from Pomona College.</p>			

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	25 legal entities: 1 processing unit, 22 traders back to back, and 2 warehouses
Participating Operator Risk Class	Low
Disputes or prior Non-compliances	N/A first certification
Changes in scope since last evaluation	N/A first certification
Total number of compliance claims	N/A first certification

2.4.2 Evaluation Itinerary and Activities

Time	Element/Activity	Personnel Involved
18.11.2019	Production Site	
9:00 Who: MV, ML	Opening Meeting <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. - Validation of scope of products to be certified and any product groupings and clarification of all suppliers. - Client to outline production process and overall process flow. - Confirmation of the supply chain or step under scope of certification - Review of legal entity documents, environmental permits, Organigramme, Appointment letters for the key staff responsible for compliance to RSB, requirements for receiving, handling and forwarding products under RSB certificate, Flowchart of process 	Management
10:00 Who: MV, ML	Site Walk-through OR Control Room Visit <ul style="list-style-type: none"> - Production chain for all main, co-product and by-product (activities of the entire plant) - Feed storage and feeding procedures - Chemical storage and disposal - Sludge repository or disposal - Weighbridges and/or in-line flowmeter for yield control purposed - Visit to all units related to the products included in the certificate from the storage tank of feedstock to the storage tanks of final products 	Production Personnel (Logistic personnel only if data are not available in SAP)
11:30	Document Review (first part) – RSB EU Principles and Criteria	Management

(parallel audit session) Who: ML	<ul style="list-style-type: none"> - Review site map(s) and layout (calibration of weighting-tools and flowmeters included) - Review documentation of historic land use/land tenure, legal tenure - Review of all relevant business licenses (environmental permit checked already in opening meeting) - Review of land and water use permits - Review of tax documents - Resource and energy usage, conservation and Efficiency - Integrated waste management 	
11:30 (parallel audit session) Who: MV	<p>Document Review (first part) – Management System</p> <ul style="list-style-type: none"> - Review of Procedures for RSB management (an integrated manual with ISO 9001 or 14001 is accepted if the implementation of all crucial requirements of RSB scheme are clearly mentioned and included). - Review of set-up of the INEOS entities linked to the project, responsible person for RSB, Person appointed for internal audit, description on how the real yield is kept under control (if statistical approach is used, please prepare extraction of input/output for at least the previous 3 years and calculation that deviation from average yield is always less than 0.5%), description to allocate bio-feedstock to output: chosen methodology and results, first internal audit and review with management, training evidence 	
13:00-14:00	Lunch Break	
14:00-15:30	- Parallel sessions from the morning	
15:30-17:30 Who: ML	<p>Document Review (second part)</p> <ul style="list-style-type: none"> - Use of trademark and claims, template review 	Management
15:30-17:30 Who: MV	<p>Production data</p> <ul style="list-style-type: none"> - Extraction of yearly data for confirming GHG calculation and yield - Review of production stock report at beginning and ending of the chosen period - Review of mass balance period 	Management/Production Manager/SAP Manager

Time	Element/Activity	Personnel Involved
19.11.2019	Production Site	
09:00-10:30 (Parallel session) Who: MV	<p>GHG assessment</p> <ul style="list-style-type: none"> - Check of period of data collection - Allocation of consumptions (e.g. per line or per feedstock) - Energy sources bills / counters data within the period above - Production report coherent within the period above - Chemical inputs within the period above (stock at beginning and end of the period, invoices of incoming chemicals) - Other relevant inputs 	GHG responsible

	This on site assessment will be based on the checklist prepared by Brent Riffel for data collection on site.	
09:00-10:30 (Parallel session) Who: ML	<p>Worker Interviews</p> <ul style="list-style-type: none"> - Interviews with key staff by risk category in absence of supervisors - Provide assurance for confidentiality - Interview with workers, review of payroll <p>Leave contact information, such as business cards</p>	<p>Focus Typical Workers (gender/age) and Low paid, Seasonal, Temporary, and non-Supervisory Personnel</p> <p>HR Manager</p>
11:00-11:30 Who: MV, ML	Auditors take time to consolidate notes and confirm audit findings of the audit	//
11:30-12:00	<p>Closing Meeting</p> <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 - Ask for questions 	Management

Time	Element/Activity	Personnel Involved
11.11.2019-13.11.2019		
Who: MV, ML	<p>Interviews with stakeholders (among which neighbouring community members, if any complaint has been received by email at SCS offices).</p> <ul style="list-style-type: none"> - Feedback from stakeholders contacted by email/phone. 	Stakeholders

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.

2.5.2 Capacity of the participating operator to implement its management systems

The management of RSB scheme has been well prepared and all evidences provided with details. Documents were available at any request of auditor and feedback provided immediately.

2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks

The RSB short claim, as defined in RSB-PRO-50-001	Short claims examples have been included in the document “2019118_Claims and communication_rev_NEW.pdf”. Statements have been taken from the standard and report “styrene” as feedstock. Compliant with group III.
Any other claims used as per RSB-PRO-50-001	N/A
Does Operator use RSB trademarks on off-product or on-product claims?	Chapter included in “2019118_Claims and communication_rev_NEW.pdf” for use of trademark in webpage and technical data sheet, which is still in on-going design.

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	
Supplier/Buyer	One of the suppliers of styrene is certified under RED CERT ² , specific for chemistry, among the current sustainability

	schemes. Even if the perception of the final customer is not giving any return of investment yet, at level of chemical companies, such step is seen positively as promoting harmonized and comparable supply chains.
Social Concerns	
N/A	N/A, there is no change for this Economic Operator as all depends on the feedstock.
Environmental Concerns	
N/A	The RE Directive is pushing for greener sources of energy. This product is an indirect outcome of that policy.

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:	Corresponding risk class (low, medium, high):	Auditor's assessment of Operator's risk
3	LOW	3-LOW, coherent with company own 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 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.
<input checked="" 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)
2019 - 1	Major	RSB-STD-20-001 RSB Standard for Traceability of RSB Certified Material ver 3.1, point 3.4.7, See standard checklist point 8.3.5.	The balance of RSB Certified Material withdrawn from and added to the mass balance system, taking into account the conversion factor, is not taken into account in the mass balance. Action Plan discussed in closing meeting: The company is verifying the statistical consumption of feedstock for any step of the process linked to BIOBASED input. Deviations more than	02/12/2019 – Closed, the point has been specifically discussed in the mass balance procedure.

			0.5% will be adjusted through real yield, while less than 0.5 it will be used the statistical yield. Procedure to be submitted in written with raw data for feedstock.	
2019-2	Minor	PO Checklist 3.3	No evidence to suggest that the risk management system has been shared with subcontractors, i.e. Limited Distributors	Open Due at Next Audit

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 checked="" type="checkbox"/> No <input type="checkbox"/> No Major NCs issued <input 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:	INEOS Styrolution Belgium NV is awarded certification against the RSB requirements listed in Section 1.5
	Certification decision by:	Inna Kitaychik
	Date of decision: For initial or continued certification	21 January 2020
	Surveillance schedule:	1 st surveillance audit by January 2021
	Notes:	