

Certification Evaluation Report

Roundtable on Sustainable Biomaterials

Nuseed Americas Inc.

SCS Certificate Code: SCS-RSB/PC-0038

5101, 333 96th Avenue NE Calgary, Alberta T3K 0S3, Canada

Glenn Johnston
www3.nuseed.com/us/

CERTIFIED	EXPIRATION
February 25, 2020	February 24, 2025

DATE(S) OF AUDIT
November 25 - 27, 2019 and December 19, 2019
DATE OF LAST UPDATE
February 25, 2020

SCS Contact:

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



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.

CONTENTS

SECTION A – PUBLIC SUMMARY	4
1.0 GENERAL INFORMATION	4
1.1 Operator Information	4
1.1.1 Name and Contact Information	4
1.2 Scope.....	4
1.2.1 Agricultural Sites/ Feedstock Production Sites	5
1.2.2 Additional Parties in Scope	6
1.3 GHG Intensity.....	6
1.4 Standards Used	6
2.0 EVALUATION PLANNING & PROCESS.....	6
2.1 Documentation Submitted by Operator	6
2.2 Audit Type and Determination	7
2.3 Audit Team.....	7
2.3.1 Determination of Audit Team.....	7
2.3.2 Audit Team.....	7
2.4 Evaluation Schedule and Extent of Audit.....	8
2.4.1 Determination of Extent of Audit	8
2.4.2 Evaluation Itinerary and Activities	8
2.5 Evaluation of Management System.....	9
2.5.1 Methodology and Strategies Employed.....	9
2.5.2 Capacity of the participating operator to implement its management systems.....	9
2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks	10
2.6 Stakeholder Consultation Process (for Main audits)	10
2.6.1 Summary of Stakeholder Comments and Responses (for Main audits)	11
3.0 RISK ASSESSMENT RESULTS	11
4.0 RESULTS OF THE EVALUATION	11
4.1 Process of Determining Compliance.....	11
4.1.1 Structure of Standard and Degrees of Non-Compliance	11
4.1.2 Interpretations of Findings	11
4.1.3 Major Non-compliances.....	12

4.1.4 Non-compliances and Current Status 12

5.0 CERTIFICATION DECISION13

Sub Certificate Codes (if applicable)..... 13

SECTION A – PUBLIC SUMMARY

1.0 GENERAL INFORMATION

1.1 Operator Information

1.1.1 Name and Contact Information

Organization name	Nuseed Americas Inc.		
Operator Number	2123		
Contact person	Glenn Johnston		
Address	5101, 333 96th Avenue NE Calgary, Alberta T3K 0S3, Canada	Telephone	+1 (720) 428-2488
	Office Business address: 1209 Orange Street, Wilmington, DE 19801	Fax	
		e-mail	glenn.johnston@nuseed.com
		Website	www3.nuseed.com/us/

1.2 Scope

Please select one:	<input checked="" type="checkbox"/> RSB EU RED	<input type="checkbox"/> RSB Global
Please select boxes that apply:	<input type="checkbox"/> Pre-assessment <input checked="" type="checkbox"/> Initial Assessment /Scope Expansion <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 and storage of <i>Brassica carinata</i> seeds	
The scope assessment agrees with the scope under which the operator applied	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If no, please explain:	At the time this audit was scoped, it was a scope expansion into a new region for the entity Agrisoma. Since the audit, Agrisoma has been acquired by Nuseed so that this audit is a main audit. However, stakeholder consultation was not conducted as this Operator is not considered a new entity.	
<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</i></p>		

<i>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>	
Total workers covered by scope of certification:	Information not available
Number of women workers	Information not available

1.2.1 Agricultural Sites/ 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:	Brassica Carinata	
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:	Family Farms	
Location/City:	North West of Buenos Aires, Argentina	
Total farms included in certification scope	17 in scope, with 17 in active operation for the 2019-2020 season *Details of farms are in the Appendix; not available for public summary	
Total Area (ha)	1442	
Total Planted Area (ha)	1442	
Total area set aside for conservation purposes (ha)	0	
Annual Feedstock Production Volume (please specify unit of measurement)	1375	
Feedstock Production counted as RSB in last calendar year (tons)	0	
Amount sold as RSB certified in last calendar year (tons)	0	
Amount of RSB material in stock at end of last calendar year (tons)	0	

1.2.2 Additional Parties in Scope

Name	Type (Warehouse, Dependent Collector, Point of Origin)	Address	Material involved
Grobocatel Hnos. SA	Consolidator/Warehouse	Av. San Martín 2500, B2930 San Pedro, Buenos Aires, Argentina <i>33°41'16.1"S 59°38'40.3"W</i>	Brassica carinata
Areco Semilla SA	Consolidator	Route 51 km 119.2, Carmen de Areco CP B6725 - Buenos Aires, Argentina	Brassica carinata

1.3 GHG Intensity

Primary Producers			
Raw Material:	Brassica carinata	GHG:	-2,890.2 to -173.5 g Co2 eq/ dry ton raw material depending on the specific farm

1.4 Standards Used

Applicable RSB-Accredited Standards

Title	Version
• RSB Principles & Criteria (RSB-STD-01-001)	3.0
• RSB Standard for EU Market Access (RSB-STD-11-001)	3.2
• RSB Chain of Custody (RSB-STD-11-001-20-001)	3.6
• RSB Standard for Participating Operators (RSB-STD-11-001-30-001)	3.2
• RSB Risk Management (RSB-STD-11-001-60-001)	3.2
• RSB Procedure on Communication and Claims (RSB-PRO-11-001-50-001)	3.3
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

RSB Screening Tool 2019 Argentina	BioGrace Excel tool for each farm
Nuseed Self-Risk Assessment 2019 Argentina	Shapefiles for all farm plots
RSB-NUS-01 Management Systems	LUC verification for all farms
RSB-NUS-02 Impact Assessment	1-POS Template (Nuseed)
RSB-NUS-03 Environmental and Social Management Plan	Nufarm Employee Handbook
RSB-NUS-04 Stakeholder Engagement	Sample of AFIP and Load tickets
RSB-NUS-05 Chain of Custody	Aggregator contracts (2)

Agrisoma Sustainability Questionnaire for each farm	Farmer contracts for all farms
Scale Certifications	Farm List

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:	Bob Armantrout	Auditor role:	Lead Auditor
<p>Qualifications: Bob is a Technical Specialist and Lead Auditor with SCS Global Services. He is a lead auditor for RSB and ISCC certifications and has performed 30 audits in the last 12 months. He has an undergraduate degree in Environmental Science from the University of Colorado, and a Master of Business Administration (MBA) from the University of Northern Colorado. Coursework included the study of landforms, soils, climate, and vegetation. He was an Instructor in the Biofuels</p>			

and Sustainable Agriculture program at Central Carolina Community College for 7 years. He spent 15 years in the biodiesel industry, primarily in Operations Management.			
Auditor Name:	Eddie Gomez	Auditor role:	Team Auditor
<p>Qualifications: Eddie Gomez, Ph.D., Lead Auditor and Instructor, SCS Global Services</p> <p>Eddie is an agronomist with emphasis on sustainable agriculture and renewable energy sources. Eddie holds master’s and Ph.D. degrees in Food, Agricultural and Biological Engineering from The Ohio State University. He has conducted several projects together with the private industry to enhance biogas production from full-scale wastewater treatment systems and to study the biodegradability of novel polymers under composting, anaerobic digestion and in soil incubation conditions. Since 2016 has been involved with certification of agricultural operations against sustainability standards in Latin America and Oceania. Eddie is currently a lead auditor of the Bonsucro Certification System, the Roundtable on Sustainable Biomaterials (RSB), the International Sustainability and Carbon Certification (ISCC) and the Alliance for Water Stewardship (AWS) certification schemes. Eddie is fluent in Spanish, English and Portuguese.</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	1 head office, 1 elevator/consolidator, 1 additional consolidator, and 17 contracted growers of Brassica Carinata seeds
Participating Operator Risk Class	Low
Disputes or prior Non-compliances	None
Changes in scope since last evaluation	None – initial audit
Total number of compliance claims	None

2.4.2 Evaluation Itinerary and Activities

Date: December 19, 2019 - Audit of Head Office	
Operation(s)/ sites visited	Activities/ notes
Head Office in Calgary, Alberta, Canada	Opening meeting Check list run-through Document review Closing Meeting
Date: November 25 & 26, 2019 (Farm and Warehouse onsite audits)	
Operation(s)/ sites visited	Activities/ notes
5 Farms	Review cultivation practices and results onsite and desk review Conservation practices and erosion controls Application of fertilizers and pesticides Water resource management

	<p>State or federally protected areas or endangered species</p> <p>Energy use and associated calculations and record keeping</p> <p>Management of hired personnel</p> <p>Site visit</p>
Grobocopatel San Pedro Port (elevator)	<p>Review seed storage practices and results</p> <p>Tour of facility</p> <p>Scale tickets</p> <p>Calibration of scales and measures</p> <p>Reviewed records of received and shipped brassica carinata from area farmers</p>

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 auditors received documentation regarding growers of Brassica carinata that were contracted during the year leading up to the audit, as well as the grain consolidator/elevator which was used to store grain over the period, to understand the participating operator’s management systems and collect information about conformity with relevant RSB EU RED standards. The onsite audits of the farms, the consolidator/elevator, and the head office suggested that the management system and practices are consistent with RSB requirements and conform to the contractual requirements defined by Nuseed Americas, Inc (Nuseed).

The Nuseed management system was assessed and found to be appropriate for operations performed at headquarters. Company policies are described in the Employee Handbook. The document provides employees with a brief summary of Nuseed’s operating policies, guidelines and standards. Employees are directed to contact their supervisor for additional information when required. Policies and expectations for conformity with RSB standards are communicated to growers in a “RSB Grower

Checklist” and “Convenio Carinata 1920”. Requirements for grain handlers are communicated in a separate “Grain Compliance Contract”.

The Nuseed employee handbook contains information on employee relations and conduct, employee practices and benefits, and safety and security policies. In particular, the employee handbook contains the following information:

- Confidentiality: Any communication of confidential information outside the company requires prior approval of management and/or confidential agreements may be required.
- Conflict resolution: Nuseed has a dispute resolution process for investigating, documenting and recommending solutions in dispute situations.
- Safety: Nuseed follows the OSHA guidelines for safety. All accidents and injuries at work, no matter how minor, must be reported to the Supervisor.
- Emergency policies: Nuseed has an Emergency and Evacuation Plan detailing procedures dealing with emergencies, including but not limited to: fire, natural disaster, state of emergency, bomb threat and medical emergencies.

Nuseed is managed by seed and transportation industry veterans.

2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks

The RSB short claim, as defined in RSB-PRO-50-001	RSB EU RED Compliant Biomass (on POS)
Any other claims used as per RSB-PRO-50-001	No RSB compliance claims made
Does Operator use RSB trademarks on off-product or on-product claims?	RSB compliance claim made on website without RSB trademark

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)

At the time this audit was scoped, it was a scope expansion into a new region for the entity Agrisoma. Therefore, stakeholder consultation was not required.

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:	Auditor’s Evaluation
2- Low	Low

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.
<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

- **Not found**

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:	Nuseed is certified against the RSB standards listed in Section 1.4
	Certification decision by:	Inna Kitaychik
	Date of decision: For initial or continued certification	February 25, 2020
	Surveillance schedule:	1 st surveillance audit by February 25, 2021 Notes:

Sub Certificate Codes (if applicable)

Legal Entity/Operational Site	Sub-Certificate Code