

Certification Evaluation Report

Roundtable on Sustainable Biomaterials

RSB Global

Manildra Group of Companies (Shoalhaven Starches Pty Ltd)

SCS Certificate Code: SCS-RSB/PC-0022

160 Bolong Road, Bomaderry NSW 2540

Client Contact: John Studdert

Client Website: www.manildra.com.au

CERTIFIED	EXPIRATION
March 1, 2021	February 28, 2026

DATE(S) OF AUDIT
19-23 November 2020
DATE OF LAST UPDATE
8 March 2021

SCS Contact:

Matthew Rudolf | Manager, Biofuels

+1.919.533.4886 (direct) mrudolf@scsglobalservices.com



SCSglobal
SERVICES

Setting the standard for sustainability™

2000 Powell Street, Ste. 600, Emeryville, CA 94608 USA
+1.510.452.8000 main | +1.510.452.8001 fax
www.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 (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.

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 of Certificate.....	4
1.2.1 Determination of Extent of Audit	5
1.2.2 Standards Used	5
1.3 Sites in Scope	6
1.3.1 Industrial Facilities	6
1.3.2 Points of Origin	6
1.4 GHG Intensity.....	7
1.5 Advanced Product Information.....	7
2.0 EVALUATION PLANNING & PROCESS.....	7
2.1 Audit Team.....	7
2.2 Evaluation Schedule and Extent of Audit.....	8
2.2.1 RSB Audit types Matrix	8
2.2.2 Methodology and Strategies Employed.....	8
2.2.3 Evaluation Itinerary and Activities	8
2.3 Documentation Submitted by Operator.....	11
2.4 Evaluation of Management System.....	12
2.4.1 Capacity of the participating operator to implement its management systems.....	12
2.4.2 Evaluation of RSB compliance claims and use of RSB trademarks	12
2.5 Stakeholder Consultation Process (for Main audits)	12
2.5.1 Summary of Stakeholder Comments and Responses (for Main audits).....	13
3.0 RISK ASSESSMENT RESULTS	13
4.0 RESULTS OF THE EVALUATION	13
4.1 Process of Determining Compliance.....	13
4.1.1 Structure of Standard and Degrees of Non-Compliance	13
4.1.2 Interpretations of Findings	14
4.1.3 Major Non-compliances.....	14

4.1.4 Non-compliances (NCs) and Current Status 15

5.0 CERTIFICATION DECISION16

Sub Certificate Codes (if applicable) 16

SECTION A – PUBLIC SUMMARY

1.0 GENERAL INFORMATION

1.1 Operator Information

1.1.1 Name and Contact Information

Organization name	Shoalhaven Starches Pty Ltd		
Operator Number	RSB 00001		
Contact person	John Studdert		
Address	160 Bolong Road Bomaderry NSW 2540	Telephone	+61 2 4423 8200
		Fax	+61 2 44217760
		e-mail	nowra@manildra.com.au
		Website	www.manildra.com.au

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 checked="" 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 it appears on certificate:	Industrial Processor, First Collector Input: Waste Starch of Wheat Processing Output: Fuel-grade Ethanol, Non-fuel Ethanol (inclusive of food, industrial, pharmaceutical and beverage grades of ethanol)	
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:	350	
Number of women workers	24	

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	1 Industrial Processor/ First Collector 1 Point of Origin
Participating Operator Risk Class	Low
Disputes or prior Non-compliances	2 NCs were issued at the last audit, and all were closed by the time of this recertification audit.
Changes in scope since last evaluation	Starch plant was added as a point of origin and product was split into fuel grade ethanol as an advanced fuel and beverage grade ethanol as an advanced product.
Total number of compliance claims	1

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 V3.4); • RSB Chain of Custody (RSB-PRO-20-001 V3.2); • RSB Standard for Advanced Fuels (RSB-STD-01-010 V2.3) • RSB Standard for Advanced Products (RSB-STD-02-001 V2.0)

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 Industrial Facilities

Name of Facility	Shoalhaven Starches Pty Ltd
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	Bolong Road Bomaderry NSW 2540, Australia
Geographic location (<i>Latitude & Longitude</i>)	Lat: -34.857150 Long: 150.612519
Start date of operations (initial start date)	2011
Number of processing steps	1 (for fuel ethanol) or 2 (for purified/beverage grade ethanol)
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.	Products: 1. Fuel-grade bioethanol produced from waste starch resulting from a wheat processing facility located on-site. 2. Purified non-fuel ethanol (food-grade) is for use in beverage, hand sanitizer and other uses.
Annual throughput of previous 12 months (Can be moved to appendix if certain information is confidential) See Annex	

1.3.2 Points of Origin

Number of Points of Origin in Scope	1
Number of Points of Origin providing more than ten metric tons per months	1
Number of Points of Origin Assessed on a Sample Basis during This Audit	1
List of Points of Origin Assessed on a Sample Basis during This Audit	
1. Name	Shoalhaven Starches Pty Ltd
Location/City	Bolong Road Bomaderry NSW 2540, Australia
Geographic location (<i>Latitude & Longitude</i>)	Lat: -34.857150 Long: 150.612519
Material generated:	Waste starch / industrial waste water from wheat processing

1.4 GHG Intensity

GHG emissions are considered to be confidential information. The information will be made available to buyers in the outgoing declaration.

1.5 Advanced Product Information (Can be moved to appendix if certain information is confidential)

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:	N/A; product is full RSB certified
For Category I products:	
State the bio-based carbon or bio-based mass content that can be ensured at any time of the production process	100%
State the standard used for measuring or calculating the biobased carbon or bio-based mass content	Based on material balance

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
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
<p><i>Day 1</i></p> <p>November 19, 2020</p>	<p>REMOTE: Microsoft teams</p> <p>Processing Unit: Manildra Group of Companies (Shoalhaven Starches Pty Ltd)</p> <p>Address: 160 Bolong Road Bomaderry, NSW 2540, Australia</p>	
8:00 a.m.	<p>Opening Meeting and General Requirements</p> <ul style="list-style-type: none"> - Review of certification program and assessment process - Review of scheduled activities - Review of RSB Procedures; confirm roles, responsibilities and processes - Confirmation of scope of products to be certified - Clarification of all entities in scope; i.e. points of origins, transportation, storage - Client to outline production process and overall process flow - Review site map(s) 	Management

	<ul style="list-style-type: none"> - Update from client and any social or environmental changes to the operation - Follow up on implementation of any corrective action plans from previous audit 	
9:00	<p>Document Review: Participating Operator/ Standards Checklist</p> <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 - Requirement for Advanced Fuels 	
11:00	<p>Site Walk-through (using video)</p> <ul style="list-style-type: none"> - Observe operations at processing facility - Observe ponds/tanks/reservoir(s) - Observe feedstock and product storage area - Observe chemical storage and disposal - Observe sludge repository or disposal - Observe other critical control points 	Production, Warehouseman, and Post Production Personnel
1:00	Lunch Break	
2:00	<p>Stakeholder Interviews</p> <ul style="list-style-type: none"> - Auditor to listen to independent assessment of prior and informed consent - Independent cross check of potential social (e.g status and impacts, land tenure, food security) and environmental issues (e.g. understanding of no-go areas, high biodiversity or special conservation areas addressed or not) - Check child labour and piece work payments 	Local stakeholders
3:00	<p>Document Review: Compliance with Principles and Criteria</p> <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 - Review impact assessments, if applicable - Review stakeholder engagement records <p>Principle 4:</p> <ul style="list-style-type: none"> - To be reviewed per RSB Proactive guidance on RSB-STD-01-001 Principles & Criteria: Implementation of Principles 4 and 12 <p>Principle 7:</p> <ul style="list-style-type: none"> - Conservation values, ecosystems, buffers, water rights <p>Principle 9:</p>	Management

	<ul style="list-style-type: none"> - Water permits, water management in ESMP <p>Principle 10:</p> <ul style="list-style-type: none"> - Air permits, air management in ESMP <p>Principle 11:</p> <ul style="list-style-type: none"> - Use of technology: GMO, fertilizers, pesticides - Integrated waste management - Resource and energy usage, and efficiency <p>Principle 12:</p> <ul style="list-style-type: none"> - To be reviewed per RSB Proactive guidance on RSB-STD-01-001 <p>Principles & Criteria: Implementation of Principles 4 and 12</p>	
4:45	<p>Report Writing</p> <ul style="list-style-type: none"> - Auditor(s) take time to consolidate notes and confirm audit findings 	
	End of Day 1	

<p><i>Day 2</i></p> <p>November 20, 2020</p>	<p>Point of Origin</p> <p>REMOTE: Microsoft teams</p> <p>Manildra Group of Companies (Shoalhaven Starches Pty Ltd)</p> <p>Address: 160 Bolong Road Bomaderry, NSW 2540, Australia</p>	
7:00 a.m.	<p>Opening Meeting and General Requirements</p> <ul style="list-style-type: none"> - Introduction to certification program and assessment process - Confirm roles, responsibilities and processes - Confirmation of scope of products to be certified 	<p>Management</p> <p>Point of Origin staff</p>
8:30	<p>Document Review:</p> <ul style="list-style-type: none"> - Review of eligibility of material - Review of process flows and feasibility of production - Review of declarations of outgoing material - Review of feedstock specific requirements, if applicable 	<p>Management</p> <p>Point of Origin staff</p>
11:00	<p>Site Walk-through (Remote)</p> <ul style="list-style-type: none"> - Observe creation of waste material 	<p>Point of Origin staff</p>
11:45	<p>Report Writing</p> <ul style="list-style-type: none"> - Auditor(s) take time to consolidate notes and confirm audit findings 	<p>Auditor</p>
12:30	<p>Findings</p> <ul style="list-style-type: none"> - Presentation of all non-compliances and opportunities for improvement 	<p>Management</p> <p>Point of Origin staff</p>

<p><i>Day 3</i></p>	<p>Point of Origin</p>	
---------------------	-------------------------------	--

November 23, 2020	REMOTE: Microsoft teams Manildra Group of Companies (Shoalhaven Starches Pty Ltd) Address: 160 Bolong Road Bomaderry, NSW 2540, Australia	
9:00 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 Day 3	

2.3 Documentation Submitted by Operator

ISO14001:2015 Certificate	Development Consent Consolidated 06_0228
ISO9001:2015 Certificate	Environment Protection Licence 883
BSI HACCP & GMP Certificate	Environmental Legal-Obligations Register FMEN031 1.0.J
Amendment to RSB Participating Operator Agreement	Environmental Complaints procedure EN-P-0010
Shoalhaven Starches RSB Systems Procedure	RSB Environmental & Social Management Plan RSB-SYS-0016 1.0.E
Self Evaluation PO Standard & Checklist & RSB Product Sales 2020.xlsx	Shoalhaven Starches Annual Environmental Management Report 2020 - to DPIE
All training – to 13 Nov 2020	RSB GHG Calc FY 2020 - RSB audit - sent to RSB
Emergency Response Team ERT Training	Bullying & Harassment Policy
HACCP Food Safety Environment Induction Training	Code of Conduct and Ethics 11-4-18
Safety – meetings, Bulletins, Inspections, Training examples	Disciplinary Policy
Training Example – Operator Skills Assessment Record	Equal Employment Opportunity Policy Statement
RSB Risk Assessment Tool Version 3.2.1 – Sept 2020 Audit	Emergency Plan SA-P-235 1.0.F
RSB Traceability of RSB Certified Material COC procedure RSB-SYS-0014 1.0.C	Grievance Resolution Policy MG-POL-0080
RSB_CHK_Manildra_2020_v1.3_RCA_Points_of_Origin_010320.xls	Human & Labour Rights Declaration DEC031
67967 591 SSS Aug 2020 - Gate 13 Weighbridge	Human Rights Policy MG-POL-0131
107310 591 SSS Aug 2020 - Grain Weighbridge	Recruitment Policy MG-POL-0119

Manildra Shoalhaven Starches Bomaderry Site Agreement	Social Responsibility Policy POL027 1.0.A
Safety, Quality & Environmental Policy	Whistleblowers Policy MG-POL-0135
Landscape & Vegetation Management Plan EN-P-251 1.0.E	Weed Control Management Plan AA-P-0004
Stormwater Management Plan EN-P-0180 1.0.F	Wastewater Management Plan EN-P-250 1.0.A
Water Saving Measures - Monitoring	Water Savings Action Plan EN-P-258
Air Quality Monitoring Plan EN-P-238 1.0.H	Waste Management Plan EN-P-240 1.0.H
Aboriginal Heritage Impact Assessment	RSB Screening Tool
RSB_TMP_StakeholderConsultationContactList_V2-0_042919.xlsx	EPA Advice Statement of Environmental Effects
Employee Listing 05-02-20	RFI Request for Additional Information_22102020_014503
MOD 18 - Modification Assessment Report	FY20 Steam Allocation

2.4 Evaluation of Management System

2.4.1 Capacity of the participating operator to implement its management systems

Shoalhaven Starches Pty Ltd is accurately and faithfully implementing a management system that includes procedures, practices and internal checks that ensure consistent compliance with the requirements of the RSB standards and procedures. The company has allocated sufficient financial, technical, management, and human resources to maintain and implement the RSB certification requirements. Additionally, personnel interviewed maintain relevant qualifications and competencies to effectively and thoroughly implement RSB certification systems and standards.

2.4.2 Evaluation of RSB compliance claims and use of RSB trademarks

For Advanced Products, signed document specifying claims approved by RSB:	Manildra will use the approved short claim for Advanced Products.
If other claims are used, are they in line with scope and allowed claims per RSB-PRO-50-001?	A claim is made on delivery documentations and is in line with scope and allowed per RSB-PRO-50-001.
Does Operator use RSB trademarks on off-product or on-product claims?	None

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.

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

Stakeholder Comments	SCS Response
Economic Concerns	
No significant concerns	No need for response
Social Concerns	
No significant concerns	No need for response
Environmental Concerns	
No significant concerns	No need for response

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
Shoalhaven Starches Pty Ltd	3	Low	September 2020	Agreed

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 (NCs) and Current Status

Summary of Non-compliances and Current Status				
NC Number	Type of NC	Relevant RSB Standard & Indicator No.	Summary of Finding and Evidence Collected	Status of NC (Open/Closed)
2020-1	Minor	Standards Checklist 1.4	<p>Version number of standards not up-to date in written scope of certification (Checklist 1.4)</p> <p>Root cause analysis received 1/14/2021</p> <p>Evidence submitted to close NC: PO's "Procedure for participating operator" and "Traceability of RSB Certified Materials" documents updated to include most up-to-date standard versions.</p>	Closed
2020-2	Major	Standards Checklist 1.4	<p>Scope not consistent across all documentation for product groupings (fuel ethanol, beverage ethanol)</p> <p>Root cause analysis received 1/14/2021</p> <p>Evidence submitted to close NC: The scope of certification has been updated. Now, fuel-grade ethanol is one scope as an advanced fuel, and non fuel-grade ethanol, which is used for beverage, hand sanitizer and other purposes, is in another scope as an advanced product. Procedures have been updated and the default claim for advanced standards has been noted in procedures. Scope was updated in the "Procedure for Participating Operators", "Traceability of RSB Certified Material (Chain of Custody), and "Environmental & Social Management Plan (ESMP) documents.</p>	Closed
2020-3	Minor	Standards Checklist 1.4	<p>Description of plant modifications not up to date in written description of scope</p> <p>Root cause analysis received 1/14/2021</p> <p>Evidence submitted to close NC: Plant modification (MOD) approvals 17 and 18 were updated in the document, "Environmental & Social Management Plan (ESMP)".</p>	Closed
2020-4	Minor	Standards Checklist 6.3.3	<p>Outgoing material documentation: no specification of raw material indicated; No statement of eligibility of ethanol as product of industrial residue; Certification scheme "global" not noted (Required on most recent version of standard, 1 year to implement).</p> <p>Root cause analysis received 1/14/2021</p>	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 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:	Re-certification against RSB Standards included in section 1.2.2
	Certification decision by:	Inna Kitaychik
	Date of decision: For initial or continued certification	16 February 2021
	Surveillance schedule:	By 28 February 2022
	Notes:	

Sub Certificate Codes (if applicable)

Legal Entity/Operational Site	Sub-Certificate Code