

Surveillance Evaluation Report

Roundtable on Sustainable Biomaterials

RSB EU RED

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

October 14, 15, and 18 & November 2 and 5, 2021

DATE OF LAST UPDATE

March 1, 2022

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FOREWORD

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

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

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

Organization of the Report

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

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SECTION A – PUBLIC SUMMARY

1.0 GENERAL INFORMATION

1.1 Operator Information

1.1.1 Name and Contact Information

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

1.2 Scope of Certificate

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 type="checkbox"/> Initial Assessment <input type="checkbox"/> Re-certification <input type="checkbox"/> Follow-Up to NCs	<input type="checkbox"/> 1st Annual Surveillance <input checked="" type="checkbox"/> 2nd Annual Surveillance <input type="checkbox"/> 3rd Annual Surveillance <input type="checkbox"/> 4th Annual Surveillance
Scope as it 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 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:	262	
Number of women workers	N/A	

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 Head office 123 fields 1 warehouse
Participating Operator Risk Class	Low
Disputes or prior Non-compliances	1 (one), against Checklist 1.11 detected during the last surveillance audit: <i>“A complete document for the internal review was not available at the time of audit”</i>

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 EU Market Access (RSB-STD-11-001 v4.0) • RSB EU RED Procedure for Traceability (Chain of Custody) (RSB-PRO-11-001-20-001 v3.7) • RSB Standard for Participating Operators (RSB-PRO-30-001 V3.3); • RSB Procedure on Communication and Claims (RSB-PRO-50-001 V3.5); • RSB Procedure for Risk Management (PRO-PRO-60-001 V3.3); • RSB GHG Calculation Methodology (RSB-STD-01-003-01 V2.3)

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

1.3 Sites in Scope

1.3.1 Agricultural Sites/ Feedstock Production Sites/ Farms

Site Type	<input checked="" type="checkbox"/> Agriculture	<input type="checkbox"/> Forestry
	<input type="checkbox"/> Biomass Production	<input type="checkbox"/> Other:
Feedstock(s) Produced:		
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:	Farms are individually controlled by each farmer.
Location/City:	See GPS coordinates in confidential Annex 2
Total number of farms included in certification scope	123 (Active)
Total farms of farms visited as a sample	None – remote audit due to COVID-19 travel restrictions
Were shapefiles of farms requested?	Yes
Did Operator provide shapefiles of farms included in scope of certification?	Yes, all of them
Total Area (ha)	7105.54
Total Planted Area (ha)	7105.54
Total area set aside for conservation purposes (ha)	0
Annual Feedstock Production Volume (please specify unit of measurement)	3,179.28 Mt (2020)
Feedstock Production counted as RSB in last calendar year (tons)	3,179.28 Mt (2020)
Amount sold as RSB certified in last calendar year (tons)	3,415 Mt (2020)
Amount of RSB material in stock at end of last calendar year (tons)	0 – Entire silo was emptied

1.3.2 Traders or Warehouses

1. Name	Grobocatel Hnos. S.A. Terminal Puerto de San Pedro
Location/City	San Pedro, Argentina
Geographic location (<i>Latitude & Longitude</i>)	33°41'16.1"S 59°38'40.3"W
Material stored:	Carinata Grain

1.4 GHG Intensity

Confidential; will be provided to downstream entities on the POS. Values in confidential appendix

1.0 EVALUATION PLANNING & PROCESS

1.1 Audit Team

Auditor Name:	Marcos Gallastegui	Auditor role:	Lead Auditor
<p>Qualifications: Marcos is a Technical Specialist and Lead Auditor with SCS Global Services. He is a lead auditor for RSB and further sustainability certifications as ISCC, 2BSvs, RSPO, Bonsucro, EPA, etc. He developed a profile of international auditing and consulting with the energy, feed, food, and industrial application sectors, focusing on the environment care, social welfare, and legal compliance as well as the assessment of greenhouse gas calculations. Besides he counts with working experience in circular economy, bioeconomy, project evaluation, shadow audits and training deliveries for work teams. He has a graduate degree in Agricultural Engineer from the Universidad de Buenos Aires. He spent several years in the certification affairs.</p>			
Auditor Name:	Eddie Gomez	Auditor role:	Observer
<p>Qualifications: Eddie Gomez, Ph.D., Lead Auditor and Instructor, SCS Global Services 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>			
Auditor Name:	Otavio Cavalett	Auditor role:	GHG Verifier
<p>Qualifications: Otavio Cavalett is a Researcher in the Industrial Ecology Programme (IndEcol), Department of Energy and Process Engineering, NTNU (Norway) and an Auditor in SCS Global Services (USA). Prior to this, he was Leader of the Sustainability Analysis Team at the Brazilian National Biorenovables Laboratory (LNBR/CNPEM) in Brazil. He has more than 15 years of experience with Life Cycle Assessment of biofuel and biorefinery systems, with emphasis on climate metrics and other environmental areas of interest in relation to the United Nations Sustainable Development Goals. He has contributed to recent IPCC reports and published more than 60 scientific papers.</p>			

1.2 Evaluation Schedule and Extent of Audit

1.2.1 RSB Audit Types Matrix

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

Surveillance audit	Annual	Annual	Annual
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1.2.2 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.

1.3 Evaluation of Management System

1.3.1 Capacity of the participating operator to implement its management systems

Overall evaluation of management system implementation: (the details of the observations and substantiating evidence collected during evaluation of the central management office and management systems of the participating operator)

See annex 2 (confidential Annex)

1.3.2 Evaluation of RSB compliance claims and use of RSB trademarks

Are all claims used in line with scope and allowed claims per RSB-PRO-50-001 or Advanced Product Standard, as applicable?	No product claims or trademark use
If claims deviate from approved language in standard, signed document specifying claims approved by RSB:	No product claims or trademark use
Does Operator use RSB trademarks on off-product or on-product claims?	No product claims

1.4 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.

2.0 RISK ASSESSMENT RESULTS

For multi-site: 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
Nuseed		1	Low	2021	Consistent with auditor’s evaluation
Overall Risk					Low

3.0 RESULTS OF THE EVALUATION

3.1 Process of Determining Compliance

3.1.1 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.

3.1.2 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.

3.1.3 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.

3.1.4 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)
2021-1	Opportunity for improvement	Standards checklists 1.12	Internal audits were parsed but was not defined in the report who did each part. Add in the template for the future	Open
2021-2	Observation	Standards checklists 2.3	The date can't be found on the screenshot validating the attendance list	Open

4.0 CERTIFICATION DECISION

Certification Recommendation		
For Surveillance Audits: Operator is to continue as an RSB certified Participating Operator subject to the minor non-compliances stated in Section 4.1.4.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Responsible Biofuels Program evaluation protocols. If certification is recommended, the Operator has satisfactorily demonstrated the following without exception:		
Operator has addressed any Major NC(s) assigned during the evaluation.	Yes <input type="checkbox"/> No <input type="checkbox"/> No Major NCs issued <input checked="" type="checkbox"/>	
Operator has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards are met over the sites and facilities covered by the scope of the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Operator has demonstrated that the described system of management is being implemented consistently over the sites and facilities covered by the scope of the certificate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments and/or details of any issue which was difficult and/or impossible to evaluate:		
To be completed by Certification Decision-Making Entity	Technical Review by: If different to decision-maker	Inna Kitaychik
	Certification decision:	Continued Certification against standards listed in Section 1.2.2
	Certification decision by:	Inna Kitaychik
	Date of decision: For initial or continued certification	25 March 2022
	Surveillance schedule:	3 rd surveillance audit by November 5, 2022