

# Certification Evaluation Report

*Roundtable on Sustainable Biomaterials*

*EU*

*UPM Kymmene Corporation*

**SCS Certificate Code: SCS-RSB/PC-0030**

PO Box 380, Alvar Aallon katu 1, 00101, Helsinki, Finland  
Gonzalo Costa

CERTIFIED	EXPIRATION
3 January 2018	2 January 2023

DATE(S) OF AUDIT
05 – 07 October 2020
Follow-up Audit (GHG Input Verification)
25 January 2021
DATE OF LAST UPDATE
3 February 2021

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## FOREWORD

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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](http://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	UPM Kymmene Corporation		
Operator Number	APP - 002098		
Contact person	Gonzalo Costa		
Address	PO Box 380, Alvar Aallon katu 1, 00101, Helsinki, Finland	Telephone	Tel. +598 4722 4644
		Fax	
		e-mail	gonzalo.costa@upm.com
		Website	http://www.upm.com

##### 1.1.2 Parties in Scope

Facility	Type	Street Address	City, State/Province
UPM-Kymmene Seven Seas Oy	Trader of grain in Europe	Alvar Aallon Katu 1	Helsinki, Finland
UPM Biofuels S.A.	Legal Entity in Uruguay	18 de Julio 818	Paysandú, Uruguay

\*Information of warehouses part of scope is confidential and therefore listed in the Appendix of full report.

#### 1.2 Scope of Certificate

Please select one:	<input checked="" type="checkbox"/> <b>RSB EU RED</b>	<input type="checkbox"/> <b>RSB Global</b>
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 type="checkbox"/> 2nd Annual Surveillance <input checked="" type="checkbox"/> 3rd Annual Surveillance <input type="checkbox"/> 4th Annual Surveillance
Scope as it appears on certificate:	<b>Cultivation and Storage of Brassica Carinata seeds and Rapeseed</b>	
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>	
<b>Total workers covered by scope of certification:</b>	331 (including UPM Biofuels)
<b>Number of women workers</b>	1 for UPM Biofuels. Total will be verified during next audit.

### 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	<p>None</p> <p>Scope includes:</p> <ul style="list-style-type: none"> <li>• 3 companies belonging to UPM (the office in Finland, the trader and the UPM office in Uruguay)</li> <li>• 97 Producers contracted by UPM for planting <i>Brassica carinata</i> or Rapeseed/Canola to cultivate seeds towards extracting oil for biofuel production.</li> <li>• 4 warehouses</li> </ul>
Participating Operator Risk Class	Low
Disputes or prior Non-compliances	None
Changes in scope since last evaluation	Added additional farms.
Total number of compliance claims	None

### 1.2.2 Standards Used

#### Applicable RSB-Accredited Standards

Standard Name and Version
RSB Principles & Criteria (RSB-STD-01-001 V3.0); RSB Standard for Participating Operators (RSB-PRO-30-001 V3.2); RSB Risk Management (PRO-STD-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-STD-11-001-20-001 V3.6); RSB Standard for EU Market Access (RSB-STD-11-001 V3.2).

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

<b>Site Type</b>		<input checked="" type="checkbox"/> Agriculture	<input type="checkbox"/> Forestry
		<input type="checkbox"/> Biomass Production	<input type="checkbox"/> Other:
<b>Feedstock(s) Produced:</b>		Brassica Carinata and Rapeseed/Colza	
<b>Current Land Use</b>		<b>Prior Land Use</b>	
<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:	
<b>Current Employment on Site</b>		<b>Prior Employment on Site</b>	
<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	
<b>Owned/Controlled By:</b>	UPM Biofuels S.A.		
<b>Location/City:</b>	Uruguay / Paysandu, Durazno, Soriano, Flores, Colonia, San Jose, Río Negro, Florida		
<b>Total number of farms included in certification scope (List is confidential; included in annex of main report)</b>	97		
<b>Total farms of farms visited as a sample</b>	10		
Were shapefiles of farms requested?	Yes		
Did Operator provide shapefiles of farms included in scope of certification?	Yes		
<b>Total Area (ha)</b>	13,478.42 (2020-2021, Brassica carinata + Rapeseed)		
<b>Total Planted Area (ha)</b>	13,478.42 (2020-2021, Brassica carinata + Rapeseed)		
<b>Total area set aside for conservation purposes (ha)</b>	0		
<b>Annual Feedstock Production Volume (please specify unit of measurement)</b>	13,277.18 tons (2019-2020, Brassica carinata + Rapeseed)		
<b>Feedstock Production counted as RSB in last calendar year (tons)</b>	10,616.86 tons (2019-2020, Brassica carinata)		

<b>Amount sold as RSB certified in last calendar year (tons)</b>	10,616.86 tons (2019-2020, Brassica carinata)
<b>Amount of RSB material in stock at end of last calendar year (tons)</b>	0

#### 1.4 GHG Intensity

Confidential; Information in Appendix; will be provided to customers.

## 2.0 EVALUATION PLANNING & PROCESS

### 2.1 Audit Team

<b>Auditor Name:</b>	Eddie Gómez	<b>Auditor role:</b>	Lead Auditor
<b>Qualifications:</b> Eddie is an Agronomist and has a master’s and Ph.D. degrees in Food, Agricultural and Biological Engineering with emphasis in sustainable production of biomass and renewable energy sources. Since 2016 has been involved with certification of agricultural operations against sustainability standards in Latin America. Eddie is currently a lead auditor of the Bonsucro Certification System, the International Sustainability and Carbon Certification (ISCC), RSB, the Alliance for Water Stewardship (AWS) and the Low Carbon Fuels Standard LCFS from CARB.			
<b>Auditor Name:</b>	Marcos Gallastegui	<b>Auditor role:</b>	Auditor in Training
<b>Qualifications:</b> Marcos is an Agricultural Engineer from the University of Buenos Aires. Since 2016 has worked as an auditor of sustainability certifications. Marcos is a certified auditor of organic standards, including EU (Europe), USDA-NOP (USA), JAS / MAFF (Japan) and Colombian Ecological Standard (National), lead auditor of the Bonsucro, RSPO P&C / SCC, RTRS, 2BSvs, RWS, and ISCC sustainability standards and CREA Adviser. Marcos is fluent in Spanish (maternal), English and Portuguese.			
<b>Auditor Name:</b>	Brent Riffel	<b>Auditor role:</b>	GHG Verifier
<b>Qualifications:</b> 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.			

### 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
<b>Day 1</b> Oct 5, 2020	<b>Remote</b> <b>Review of First Gathering Point</b>	
8:30 a.m.	<b>Opening Meeting and General Requirements</b> <ul style="list-style-type: none"> <li>- Introduction to certification program and assessment process to on-site staff</li> <li>- Review of scheduled activities</li> <li>- Review of RSB Procedures; confirm roles, responsibilities and processes</li> <li>- Confirmation of scope of products to be certified</li> <li>- Clarification of all suppliers; i.e. farms, transportation, storage</li> <li>- Client to outline production process and overall process flow</li> <li>- Review site map(s)</li> <li>- Update from client and any social or environmental changes to the operation</li> </ul>	Management
9:00	<b>Document Review: Participating Operator/ Standards Checklist</b> <ul style="list-style-type: none"> <li>- Review of training procedures and records</li> <li>- Review of Grievance Mechanism</li> <li>- Review of traceability method and implementation (including acquiring, handling, and forwarding sustainable material)</li> <li>- Analysis of material balances and records</li> <li>- Review of records</li> <li>- Review of GHG input table from 2019 GHG data</li> <li>- Communications and Claims</li> </ul>	
12:00	<b>Lunch Break</b>	

1:30 p.m.	<p><b>Document Review: Compliance with Principles and Criteria</b></p> <p>Principle 1:</p> <ul style="list-style-type: none"> <li>- Review of all relevant business licenses</li> <li>- Review of land and water use permits</li> </ul> <p>Principle 2:</p> <ul style="list-style-type: none"> <li>- Review updated screening tool</li> <li>- Review implementation of environmental and social management plan</li> <li>- Review impact assessments, if applicable</li> <li>- Review any grievances from local community</li> <li>- Review budget for upcoming year</li> </ul> <p>Principle 4:</p> <ul style="list-style-type: none"> <li>- Review of records of independent third parties involved in operations and evidence that they meet RSB requirements</li> <li>- Review any grievances from workers</li> </ul> <p>Principle 7:</p> <ul style="list-style-type: none"> <li>- Conservation values, ecosystems, buffers, water rights</li> </ul> <p>Principle 8:</p> <ul style="list-style-type: none"> <li>- Review of nutrient management plan</li> <li>- Evidence of implementation of soil management plan</li> </ul> <p>Principle 9:</p> <ul style="list-style-type: none"> <li>- Evidence of implementation of water management plan</li> <li>- Review of annual monitoring records</li> <li>- Review of any degradation of water resources that occurred prior to certification</li> <li>- Review of any waste water or runoff</li> </ul> <p>Principle 11:</p> <ul style="list-style-type: none"> <li>- Confirmation that GMOs are not used</li> </ul> <p><i>NOTE: GHGs for 2020 will be provided in 2021; input verification will take place at that time</i></p>	Management
4:45	<p><b>Report Writing</b></p> <ul style="list-style-type: none"> <li>- Auditor(s) take time to consolidate notes and confirm audit findings</li> </ul>	
5:00	<b>End of Day 1</b>	

<p><b>Day 2</b> Oct 6, 2020</p>	<p><b>Farms(s):</b> <b>Farm 1-10</b></p>	
8:30 a.m.	<p><b>Opening Meeting and General Requirements</b></p> <ul style="list-style-type: none"> <li>- Introduction to certification program and assessment process to on-site staff</li> <li>- Confirm roles, responsibilities and processes</li> <li>- Confirmation of scope of products to be certified</li> </ul>	Farm Management

8:30	<b>Document Review: Participating Operator/ Standards Checklist (Farms 1-5)</b> <ul style="list-style-type: none"> <li>- Confirm fields and production</li> <li>- Confirm origin of crops</li> <li>- Confirm cultivation dates for compliance with Jan 2008 rule</li> <li>- Review of feedstock specific requirements, if applicable</li> </ul>	Farm Management
12:00	<b>Lunch break</b>	
1:30 p.m.	<b>Document Review: Participating Operator/ Standards Checklist (Farms 6-10)</b> <ul style="list-style-type: none"> <li>- Confirm fields and production</li> <li>- Confirm origin of crops</li> <li>- Confirm cultivation dates for compliance with Jan 2008 rule</li> <li>- Review of feedstock specific requirements, if applicable</li> </ul>	Farm Management
04:45 p.m.	<b>End of Day 2</b>	

<b>Day 3</b> Oct 7, 2020	<b>Warehouse(s) - Remote</b> <b>Warehouse 1 and Warehouse 2</b>	
8:30 a.m.	<b>Opening Meeting and General Requirements</b> <ul style="list-style-type: none"> <li>- Review of assessment process to on-site staff</li> <li>- Confirm roles, responsibilities and processes</li> <li>- Confirmation of scope of products to be certified</li> </ul>	Management Warehouse Staff
9:00	<b>Document Review: Participating Operator/ Standards Checklist</b> <ul style="list-style-type: none"> <li>- Review of training procedures and records</li> <li>- Review of contracts and records</li> <li>- Review of traceability method and implementation (including acquiring, handling, and forwarding sustainable material)</li> <li>- Analysis of material balances and records</li> </ul>	Management Warehouse Staff
12:00	<b>Lunch Break</b>	
1:30 p.m.	<b>Site Walk-through (remote): Site 1</b> <ul style="list-style-type: none"> <li>- Observe storage area</li> <li>- Meters and other measurement instruments, data gathering and processing tools are adequate</li> </ul>	
2:30	<b>Site Walk-through (remote): Site 2</b> <ul style="list-style-type: none"> <li>- Observe storage area</li> <li>- Meters and other measurement instruments, data gathering and processing tools are adequate</li> </ul>	
3:30	<b>Findings</b>	

	<ul style="list-style-type: none"> <li>- Presentation of all non-compliances and opportunities for improvement</li> </ul> <p><b>Closing Meeting</b></p> <ul style="list-style-type: none"> <li>- Presentation of General audit finding</li> <li>- Presentation of all non-compliances and opportunities for improvement</li> <li>- Fix timetables for corrective actions</li> <li>- Reiterate SCS appeal policy</li> <li>- Questions</li> </ul>	
4:00	<b>End of Day 3</b>	

<b>Day 4</b> Jan 25, 2021	<b>GHG Input Verification for 2020 Values</b>	
8:30 a.m.	<p><b>GHG Verification</b></p> <ul style="list-style-type: none"> <li>- Verification of input values in submitted calculator</li> </ul>	Management

### 2.3 Documentation Submitted by Operator

2020-09-24 UPM Biofuels Development Sustainability management system for carinata operations v2_3
2020-09-01 certification scope question
2020-09 intenal audit RSB requirements UPM operations UY2.xlsb
2020-08-24 RSB PO amendment agreement signed UPM (003)
17-8-7 RSB-Participating-Operator-Agreement-2017 - UPM
RSPO,ISCC_FARMLIST_esp 2020
17-8-7 RSB Application - UPM - APP-002098
2019 october carinata Sustainability Risk Assessment
2019-09-10 Environmental and Social Management plan for carinata operations v.1.1
Guía de Manejo de Brassica Carinata 2020 (comprimido)
Normativa Vigente a la Producción Agrícola (2-6-2020)
RSB-GUI-01-002-02_Screening-Tool UPM Uruguay carinata 2020
2020 Conservation Management Plan
2020-24-06 Land selection 2020

### 2.4 Evaluation of Management System

#### 2.4.1 Capacity of the participating operator to implement its management systems

*An overall evaluation of the participating operator’s responsiveness and ability to consistently and effectively implement its management system based on the financial, technical, and human resources available.*

Overall evaluation of management system is in Appendix 2 (the details of the observations and substantiating evidence collected during evaluation of the central management office and management systems of the participating operator)

**2.4.2 Evaluation of RSB compliance claims and use of RSB trademarks**

<b>The RSB short claim, as defined in RSB-PRO-50-001</b>	None
<b>Any other claims used as per RSB-PRO-50-001</b>	None
<b>Does Operator use RSB trademarks on off-product or on-product claims?</b>	None

**3.0 RISK ASSESSMENT RESULTS**

<b>Based on the most recent self-risk assessment the PO’s risk assessment results are (The number):</b>	<b>Corresponding risk class (low, medium, high):</b>	<b>Date of risk assessment (must be no older than 3 months from the audit date)</b>	<b>Auditor’s assessment of Operator’s risk</b>
8	Low	2020	The auditor agrees with the results of the most-recent self-risk 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 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

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)
NA			No NCs were evidenced during this 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 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 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:	2020 GHG Calculations not evaluated at the time of surveillance; were submitted to SCS in Jan 2021; decision was made after evaluation	
To be completed by Certification Decision-Making Entity	<b>Technical Review by:</b> If different to decision-maker	Inna Kitaychik
	<b>Certification decision:</b>	Continued Certification against Standards listed in 1.2.2
	<b>Certification decision by:</b>	Inna Kitaychik
	<b>Date of decision:</b> For initial or continued certification	1 February 2021
	<b>Surveillance schedule:</b>	4 <sup>th</sup> Surveillance audit by 7 October 2021  Notes:

### Sub Certificate Codes (if applicable)

Legal Entity/Operational Site	Sub-Certificate Code