

# Surveillance Report

## *Roundtable on Sustainable Biomaterials*

### *Biomass Supplies Pvt Ltd*

#### **SCS Certificate Code-SCS-RSB/PC-0017**

165/6, Park Road, Colombo 5, Sri Lanka

Ms. Shenelly de Silva

[www.biomass-group.com](http://www.biomass-group.com)

CERTIFIED	EXPIRATION
August 26, 2015	August 25, 2020

DATE(S) OF AUDIT
September 17-19, 2019
DATE OF LAST UPDATE
May 1, 2020

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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. 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.

## CONTENTS

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<b>SECTION A – PUBLIC SUMMARY .....</b>	<b>4</b>
<b>1.0 GENERAL INFORMATION.....</b>	<b>4</b>
1.1 Operator Information .....	4
1.1.1 Name and Contact Information .....	4
1.2 Scope of Certificate.....	4
1.3 GHG Intensity.....	6
1.4 Standards Used .....	6
<b>2.0 EVALUATION PLANNING &amp; PROCESS.....</b>	<b>6</b>
2.1 Documentation Submitted by Operator .....	6
2.2 Audit Type and Determination .....	6
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.....	7
2.4.1 Determination of Extent of Audit .....	7
2.4.2 Evaluation Itinerary and Activities .....	8
2.5 Evaluation of Management System.....	10
2.5.1 Methodology and Strategies Employed.....	10
2.5.2 Capacity of the participating operator to implement its management systems.....	10
2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks .....	11
2.6 Stakeholder Consultation Process (for Main audits) .....	11
<b>3.0 RISK ASSESSMENT RESULTS.....</b>	<b>11</b>
<b>4.0 RESULTS OF THE EVALUATION .....</b>	<b>11</b>
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
<b>5.0 CERTIFICATION DECISION.....</b>	<b>15</b>



## SECTION A – PUBLIC SUMMARY

### 1.0 GENERAL INFORMATION

#### 1.1 Operator Information

##### 1.1.1 Name and Contact Information

Organization name	Biomass Supplies (Pvt.) Limited		
Operator Number	1327		
Contact person	Shenelly de Silva		
Address	165/6, Park Road, Colombo 5, Sri Lanka	Telephone	Mobile: +94-768455178
		Fax	
		e-mail	shenelly@biomass-group.com
		Website	www.biomass-group.com

#### 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 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 checked="" type="checkbox"/> 4th Annual Surveillance
Scope (as should appear/appears) on certificate:	Gliricidia sticks production, collection and transportation	
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>	55	
<b>Number of women workers</b>	22	

### FEEDSTOCK PRODUCTION SITES

<b>Site Type</b>	<input type="checkbox"/> Agriculture	<input type="checkbox"/> Forestry
	<input type="checkbox"/> Biomass Production	<input checked="" type="checkbox"/> Other: Live Fence Residue
<b>Feedstock(s) Produced:</b>	<b>Gliricidia sticks</b>	
<b>Current Land Use</b>	<b>Prior Land Use</b>	
<input type="checkbox"/> Biomass Production	<input type="checkbox"/> Biomass Production	
<input type="checkbox"/> Agriculture	<input type="checkbox"/> Agriculture	
<input checked="" type="checkbox"/> Other: Live Fences	<input checked="" type="checkbox"/> Other: Live Fences	
<b>Current Employment on Site</b>	<b>Prior Employment on Site</b>	
<input checked="" type="checkbox"/> Negligible	<input checked="" type="checkbox"/> Negligible	
<input type="checkbox"/> Local Average	<input 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>	Various sites controlled by numerous farmers	
<b>Location/City:</b>	Colombo, Sri Lanka	
<b>Total residue providers included in certification scope</b>	36 – however, farms are residue suppliers rather than crop suppliers. Geographic locations are being collected in an electronic database as the company grows, and the database is planned to be populated by end 2019.	
<b>Geographic location:</b>	<b>*Available in Checklist, tab "General Data"</b>	
<b>Annual Feedstock Production Volume</b> (please specify unit of measurement)	137,175 KG	
<b>Feedstock Production counted as RSB in last calendar year (tons)</b>	137,175 KG	
<b>Amount sold as RSB certified in last calendar year (tons)</b>	137,175 KG	
<b>Amount of RSB material in stock at end of last calendar year (tons)</b>	0 KG (all immediately sold)	

<b>TRADERS or WAREHOUSES (if in scope)</b>	
<b>1. Name</b>	Puttalam Collecting Center
<b>Location/City</b>	Biomass Supplies Regional Office Pvt Ltd, Pambala, Kakkapalliya, Puttalam, Sri Lanka.
<b>Geographic location (Latitude &amp; Longitude)</b>	7.525562, 79.826207
<b>Material stored:</b>	Gliricidia Sticks

### 1.3 GHG Intensity

First Collectors			
Raw Material:	Gliricidia Sticks	GHG:	14.4 kg CO <sub>2</sub> e/dry ton

### 1.4 Standards Used

#### Applicable RSB-Accredited Standards

Title	Version
• RSB Chain of Custody (RSB-STD-20-001)	3.1
• RSB Standard for Participating Operators (RSB-STD-30-001)	3.1
• RSB Risk Management (RSB-STD-60-001)	3.1
• RSB Procedure on Communication and Claims (RSB-PRO-50-001)	3.3
• RSB Standard for advanced fuels (RSB-STD-01-010)	2.2
All standards employed are available on the websites of the Roundtable on Sustainable Biomaterials ( <a href="http://rsb.org/sustainability/rsb-sustainability-standards/">http://rsb.org/sustainability/rsb-sustainability-standards/</a> ). Standards are also available, upon request, from SCS Global Services ( <a href="http://www.scsglobalservices.com/">http://www.scsglobalservices.com/</a> ).	

## 2.0 EVALUATION PLANNING & PROCESS

### 2.1 Documentation Submitted by Operator

Chain of Custody_3.1	GHG cal_tool.xlsx
Biomass_Self-Risk-assessment	3. Risk Management System_v.1
Biomass IMP_Summary	1.New_Farmers' Forward Supply Contract- Gliricidia 10 10 2018 (FINAL)
7. Quality Assurance Doc	Consent declaration_signed
ESMP_v.4	consent declaration_sinhala-1
Farmer registration details_uptoJune2019	Master Summary of Trainings_2019
Quarterly balance_2018_19	Rent Agreement_Biomass Supplies collection center
Screening Tool	Self Evaluation Report_Internal Audit_2019_20
Staff Training Manual_2019	Staff Training Manual_2019
Staff Training_PPT	Invoices and Goods Received Notes
Training Attendance Sheets	

### 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

<b>Auditor Name:</b>	Inna Kitaychik	<b>Auditor role:</b>	Lead Auditor
<b>Qualifications:</b> Inna Kitaychik is the Operations Manager for the Responsible Biofuels & Bio-based Products Program at SCS Global Services. Additionally, Inna is a Lead ISCC, Bonsucro Chain of Custody, and RSB auditor. Inna graduated with a master’s in city and Regional Planning from Cornell University in 2013.			

## 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 Main Office 1 First Collector 36 Points of Origin
Participating Operator Risk Class	Low
Disputes or prior Non-compliances	Two minor non-compliances open since last audit; 1 closed during this surveillance; 1 remains open and has



	been elevated to a Major non-compliance
Changes in scope since last evaluation	Additional of Collecting Center
Total number of compliance claims	0

**2.4.2 Evaluation Itinerary and Activities**

Time	Element/Activity	Personnel
17 /09/ 2019	<b>Remote Desk Audit – Zoom; invitation sent</b> <b>Day 1</b>	
8:30 am	<b>Opening Meeting</b> <ul style="list-style-type: none"> <li>– Introductions of audit team and Biomass Supplies representatives; overview of desk review certification program and assessment process to Biomass Supplies staff</li> <li>– Confirmation of scheduled activities, communications, and resources</li> <li>– Confidentiality</li> <li>– Methods of reporting and types of findings and communication of these</li> <li>– Audit team responsible for executing the audit plan and documenting evidence</li> <li>– Sampling procedures</li> <li>– Closing meeting time to be on Thursday September 19th at 10:00am Colombo time</li> <li>– SCS appeal policy</li> <li>– Questions and discussion</li> </ul>	Management
9:00 am	<b>Review of Participating Operator Requirements (RSB-STD-30-001*)</b> <b>General requirements</b> <ul style="list-style-type: none"> <li>– Confirmation of scope of certification</li> <li>– Roles and responsibilities</li> <li>– Legal Status</li> <li>– Subsidiaries</li> <li>– Standards and certification systems currently in place and their status</li> <li>– Update on contracts</li> <li>– Self-evaluation</li> </ul>	Management
9:30 am	<b>Training requirements and records</b> <ul style="list-style-type: none"> <li>– Interview with management representative to confirm knowledge</li> </ul>	Management
10:00 am	<b>Risk Management</b> <ul style="list-style-type: none"> <li>– Review of ‘Risk Management System’</li> <li>– Review of different risk and how they are handled throughout company structure.</li> </ul> <b>Grievance process and records</b> <ul style="list-style-type: none"> <li>– Review of complaint mechanism and structure for handling complains</li> </ul>	Management HR representative if available
10:30 am	<b>Close of Day 1 and Initial Findings and Documents to Submit</b>	

Time	Element/Activity	Personnel
18 /09/ 2019	<b>Remote Desk Audit – Zoom; invitation sent</b> <b>Day 2</b>	
8:30 am	<p><b>Follow-up to requested items from prior day</b></p> <ul style="list-style-type: none"> <li>- Risk Management (Interview with CEO) (PO Checklist 2.4, 3.2)</li> <li>- Contracts</li> <li>- Grievance</li> </ul> <p><b>Continuation of review of requirements of the ‘Standards’ Checklist (formerly Participating Operator Checklist)</b></p> <p><b>General requirements for the traceability of certified material</b></p> <ul style="list-style-type: none"> <li>- Roles and responsibilities</li> <li>- Contracts</li> </ul>	Management
9:00 am	<p><b>Records</b></p> <ul style="list-style-type: none"> <li>- Invoices</li> </ul> <p><b>Requirements for Product Segregation Chain of Custody Systems</b></p> <ul style="list-style-type: none"> <li>- Overview</li> </ul>	Management
9:30 am	<p><b>Requirements for conducting and verifying calculations of GHG savings</b></p> <ul style="list-style-type: none"> <li>- Calculations</li> </ul> <p><b>Communications and Claims</b></p> <ul style="list-style-type: none"> <li>- Use of trademarks</li> </ul>	Management
10:00 am	<p><b>General requirements for the certification of end-of-life-products and production residues</b></p> <ul style="list-style-type: none"> <li>- Updates to the RSB-STD-01-010 standard; additional requirements</li> </ul>	Management HR representative if available
10:30 am	<b>Close of Day 2 and Initial Findings and Documents to Submit</b>	

Time	Element/Activity	Personnel Involved
19 /09/ 2019	<b>Remote Desk Audit – Zoom; invitation sent</b> <b>Day 3</b>	
8:30 am	<b>Follow-up to requested items from prior day</b>	Management
9:00 am	<b>Principles and Criteria for Surveillance Audits</b>	Management
10:00 am	<b>Closing Meeting</b> <ul style="list-style-type: none"> <li>- Findings</li> <li>- Deadlines</li> <li>- Action Plan</li> <li>- Questions, Comments</li> </ul>	Management

## 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

*Note: include 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 implementation in the table 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)

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

The RSB short claim, as defined in RSB-PRO-50-001	The one currently used is “RSB Compliant Biomass/Biofuel”, not in line with RSB-PRO-50-001, an NC has been raised
Any other claims used as per RSB-PRO-50-001	None
Does Operator use RSB trademarks on off-product or on-product claims?	Yes, trademark used on invoices

**2.6 Stakeholder Consultation Process (for Main audits)**

N/A; Surveillance Audit

**3.0 RISK ASSESSMENT RESULTS**

Based on the most recent self-risk assessment (no older than 3 months from the audit date) the PO’s risk assessment results are:	Corresponding risk class (low, medium, high):	Auditor’s assessment of Operator’s risk
4	Low	Agrees with 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 type="checkbox"/>	No major NCs were issued to the Operator during the evaluation. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input checked="" type="checkbox"/>	Major NCs were issued to the Operator during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major NCs were issued to the Operator during the evaluation and the Operator has not yet satisfactorily closed all major NCs.

**4.1.4 Non-compliances and Current Status**

This section includes:

1. Finding
2. Action Plan once received
3. Due date for NC closure
4. How finding was closed including evidence submitted

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)
6 (2018) 2019-3	Minor	RSB Standard for P.O.s: Para 1.4.2  PO Checklist 1.7, 5.4	Sustainability agreements with farmers do not indicate that farmers agree for land to be accessible to auditors. P.O. is currently implementing an IT system that will include this information in the future.  2019 Update: Contracts are not yet implemented with suppliers or buyers.  NOTE: In the place of a contract with the buyer, a purchase order can be accepted, where the RSB compliant product is clearly	Open  To be reviewed at next audit

			<p>ordered (including other information about the product and its delivery).</p> <p>2020 Update: To be reviewed at on-site re-certification audit in 2020. As there have been sales in 2019, this requirement must be implemented in April as indicated in the action plan.</p>	
2019-1	Minor	PO Checklist 1.2	Legal Status is not included in the chain of custody manual.	Open
2019-2	Minor	PO Checklist 1.4	Sites in RSB scope are not clearly listed in ChoC manual; regional office not listed. All delivery sites for Client are not listed. Additionally, geographical coordinates and total surface (ha); not provided at this time	Open
2019-4	Minor	PO Checklist 1.9	Self-evaluation is only done against the Action Plan from the previous year. Self-evaluation process for evaluating against all relevant RBS criteria is not developed or documented.	Open
2019-5	Minor	PO Checklist 2.4	The management representative with overall responsibility for risk management and chain of custody implementation was not available to be interviewed for the assessment.	Open
2019-6	Major	PO Checklist3.3	<p>1. Not all regional managers have access to the risk matrix; two were missing from the Google Drive</p> <p>2. Risk management matrix is covered with field officers in training; however this is not clear training documents.</p> <p>2020 Update:</p> <p>1. Evidence submitted showed that the two current regional managers both have access to the Risk matrix on Google Drive.</p> <p>2. Powerpoint with link to risk management matric shown on page 8 was submitted</p>	Closed
2019-7	Minor	PO Checklist11.2	<p>RSB webpage address is missing from invoice where trademark is used.</p> <p>2020 Update: Updated template with RSB webpage was submitted</p>	Closed
2019-8	Minor	PO Checklist12.5.2, 12.5.4	Contracts do not yet have the required information in G.2.2.4.	Open

			2020 Update: Contracts to be finalized in April 2020 and will adhere to clause G.2.2.4	
2019-14	OFI	PO Checklist 1.2	It is not clear that Alexis Corblin is a consultant, and not part of the organization (re: "connected organizations" from the requirement).	Open
2019-15	OFI	PO Checklist 3.1	<p>1. Risk monitoring action is specific to each measure and not clearly defined in the matrix; some risks are always there; some can be resolved; this is not clear</p> <p>2. Risks that are considered low, do not require a mitigation plan; as a result there are blank boxes for mitigation measure and responsible person; it is not clear whether information is missing for the matrix or that these boxes are not required to be filled out</p> <p>3. Risks are not tagged as RSB.</p>	Open
2019-17	Minor	PO Checklist 6.1	PO could not provide evidence that it keeps all RSB related documents for at least 5 years; audit documents for initial audit in 2015 could not be provided	Open
2019-18	Minor	PO Checklist 6.3.2	<p>The short claim used on Sustainability Declaration is not in line with the RSB Procedure on Communications and Claims Standard. The one currently used is "RSB Compliant Biomass/Biofuel". According to the Standard, the appropriate one for Product Segregation is "RSB compliant material" unless otherwise approved by RSB.</p> <p>2020 Update: Invoice template with correct claim submitted</p>	Closed

## 5.0 CERTIFICATION DECISION

Certification Recommendation		
<b>For Initial and Re-certifications: Operator to be awarded RSB certification subject to the minor non-compliances stated in Section 4.2.5.</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
<b>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.</b>	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 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:		
<b>To be completed by Certification Decision-Making Entity</b>	<b>Technical Review by:</b>	Matthew Rudolf
	<b>Certification decision:</b>	1. Biomass Supplies is to be suspended as evidence to close major non-conformities and an action plan for all non-conformities was not submitted by the 3 month deadline: December 19, 2019, nor was it submitted by the deadline extended to February 13, 2020. 2. Biomass Supplies is to be unsuspended following submission of evidence to close all major non-conformities and action plan for minor non-conformities
	<b>Certification decision by:</b>	Matthew Rudolf
	<b>Date of decision:</b> For initial or continued certification	Suspension Decision: February 14, 2020 Unsuspension Decision: April 24, 2020
	<b>Surveillance schedule:</b>	Recertification Audit May 2020  Notes: