

# Surveillance Evaluation Summary Report

*Roundtable on Sustainable Biomaterials*

*RSB EU RED*

*UPM Biofuels S.A.*

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

18 de Julio 818

60.000, Paysandú, Uruguay

Gonzalo Costa

CERTIFIED	EXPIRATION
3 January 2018	2 January 2023

DATE(S) OF AUDIT
4 <sup>th</sup> Surveillance Audit
05 – 06 October, 2021
Warehouse Scope Expansion 1
25 October, 2021
Warehouse Scope Expansion 2
10 January, 2022
DATE OF LAST UPDATE
29 April, 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](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 Biofuels S.A.		
Operator Number	APP - 002098		
Contact person	Gonzalo Costa		
Address	18 de Julio 818 60.000, Paysandú, Uruguay	Telephone	Tel. +598 4722 4644
		Fax	
		e-mail	gonzalo.costa@upm.com
		Website	http://www.upm.com

##### 1.1.2 Additional Parties Involved

Organization name	UPM-Kymmene Seven Seas Oy		
Contact person	Liisa Ranta		
Address	Alvar Aallon Katu 1, Helsinki, Finland	Telephone	Tel. +358 40 582 9338
		Fax	
		e-mail	liisa.ranta@upm.com
		Website	http://www.upm.com
Nature of Involvement:			
Trading company of grains, also within the UPM group. Separately audited under RSB Certificate SCS-RSB/PC-00392, Participating Operator 2095			

#### 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"/> 1st Annual Surveillance
	<input type="checkbox"/> Initial Assessment	<input type="checkbox"/> 2nd Annual Surveillance
	<input type="checkbox"/> Re-certification	<input type="checkbox"/> 3rd Annual Surveillance
	<input type="checkbox"/> Follow-Up to NCs	<input checked="" type="checkbox"/> 4th Annual Surveillance
Scope as it appears on certificate:	Cultivation and Storage of Brassica Carinata and Rapeseed/Canola	

The scope assessment agrees with the scope under which the operator applied	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If no, please explain:	Camelina seeds were also applied for but were removed from scope due to poor harvest and low volumes	
<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>	6 (UPM Biofuels S.A.)	
<b>Number of women workers</b>	1 (UPM Biofuels S.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	Three warehouses UPM Office in Uruguay (UPM Biofuels S.A.) 69 Producers contracted by UPM for planting <i>Brassica carinata</i> or Rapeseed/Canola to cultivate seeds towards extracting oil for biofuel production.
Participating Operator Risk Class	Low
Disputes or prior Non-compliances	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 EU Market Access (RSB-STD-11-001 V4.0);
RSB EU RED Procedure for Traceability (Chain of Custody) (RSB-STD-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 Risk Management (RSB-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

<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>	<b>Cultivation and Storage of Brassica Carinata, Repeseed/Canola</b>	
<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 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, Dolores, Montevideo, Lascano, Mercedes, Flores, San José	
<b>Total number of farms included in certification scope</b>	69 <b>(Complete list of farms in confidential annex)</b>	
<b>Total farms of farms visited as a sample</b>	9 (remote assessment) - one farm was removed from scope post-audit due to poor harvest of camelina.	
Were shapefiles of farms requested?	Yes	
Did Operator provide shapefiles of farms included in scope of certification?	Yes	
<b>Total Area (ha)</b>	10,404.98 ha	
<b>Total Planted Area (ha)</b>	10,404.98 ha	
<b>Total area set aside for conservation purposes (ha)</b>	0	
<b>Annual Feedstock Production Volume (please specify unit of measurement)</b>	Carinata: 29744 Mt (2022) Rapeseed/Canola: 89783 Mt (2022)	

<b>Feedstock Production counted as RSB in last calendar year (tons)</b>	Carinata: 10305.6 Mt (produced in 2021) Colza (extracted oil): 3,502.30 Mt
<b>Amount sold as RSB certified in last calendar year (tons)</b>	Carinata: 10305.6 Mt (produced in 2021) Colza (extracted oil): 3,502.30 Mt
<b>Amount of RSB material in stock at end of last calendar year (tons)</b>	0

### 1.3.2 Traders or Warehouses (See confidential Annex)

### 1.4 GHG Intensity

This information is considered confidential and will be made available to all customers upon request

## 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>	Otavio Cavalett	<b>Auditor role:</b>	GHG Verifier
<b>Qualifications:</b> 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 Biorenewables 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.			

### 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 years
Main audit	Every 5 years	Every 3 years	Every 2 years
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
<b>Day 1</b> October 5, 2021	<b>Remote Review of First Gathering Point</b> <b>Lead auditor: Eddie Gomez</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, blending, 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> <li>– Follow up on implementation of any corrective action plans from desk audit or previous initial field audit</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> </ul>	

	<ul style="list-style-type: none"> <li>- Analysis of material balances and records</li> <li>- Review of records</li> <li>- Review of GHG inputs</li> <li>- Communications and Claims</li> </ul>	
12:00	<p><b>Lunch Break</b></p> <ul style="list-style-type: none"> <li>- Working lunch off site</li> </ul>	
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 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>- Work conditions, piece work and living wage, equality issues, unions</li> <li>- Review of contracts, policies and training records grievances</li> <li>- Training and occupational health and safety record</li> <li>- Records for freedom of association mechanism</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, process in ESMP</li> </ul> <p>Principle 9:</p> <ul style="list-style-type: none"> <li>- Water permits, water management in ESMP</li> </ul> <p>Principle 10:</p> <ul style="list-style-type: none"> <li>- Air permits, air management in ESMP</li> </ul> <p>Principle 11:</p> <ul style="list-style-type: none"> <li>- Use of technology: GMO, fertilizers, pesticides</li> <li>- Integrated waste management</li> <li>- Resource and energy usage, and efficiency</li> </ul> <p>Principle 12:</p> <ul style="list-style-type: none"> <li>- Review documentation of historic land use/land tenure, legal tenure</li> </ul>	Management
5:15	<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>	
	<b>End of Day 1</b>	

<b>Day 2</b> October 6, 2021	<b>Farms(s)</b> <b>Lead auditor: Eddie Gomez</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>- Confirm roles, responsibilities and processes</li> <li>- Confirmation of scope of products to be certified</li> </ul>	Farm Management
	<b>Document Review: Participating Operator/ Standards Checklist (Farms)</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 p.m.	<b>Lunch Break</b>	
1:30 p.m.	<b>Document Review: Participating Operator/ Standards Checklist (Farms)</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
4:45 p.m.	<b>Report Writing</b> <ul style="list-style-type: none"> <li>- Auditor(s) take time to consolidate notes and confirm audit findings</li> </ul>	Auditors
5:00 p.m.	<b>Closing Meeting</b> <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>	

**Scope expansion audit 1: warehouses**

Time	Element/Activity	Personnel
October 25, 2021	<b>Warehouse 1: Name is business confidential</b> <b>Lead Auditor: Eddie Gomez</b>	
1:30 p.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> </ul>	Management

2:30 p.m.	<b>Review of RSB Procedures</b> <ul style="list-style-type: none"> <li>- Confirm roles, responsibilities and processes (PO 5.1 -5.4)</li> <li>- Confirmation of scope of products to be certified (including other Certifications) (PO 6.3)</li> <li>- Client to outline process flow</li> <li>- Review site map(s); virtual tour, if possible</li> </ul>	Management
3:00 p.m.	<b>Document Review: Participating Operator/ Standards Checklist</b> <ul style="list-style-type: none"> <li>- Review of contract (PO 1.9)</li> <li>- Review of training procedures and records (PO 2.1.2)</li> <li>- Review of traceability method and implementation (including acquiring, handling, and forwarding sustainable material (PO 6.2.3, 6.5, 6.6)</li> <li>- Analysis of templates for material balances (PO 6.4)</li> <li>- Analysis of templates/procedures for transfer of sustainability information (PO 6.4.1, 6.4.2)</li> <li>- GHG: transport data is provided and included in UPM's GHGs (PO 9.4.2, 9.2.9- 9.2.11)</li> </ul>	Management
5:00 p.m.	<b>Report Writing</b> <ul style="list-style-type: none"> <li>- Auditor(s) take time to consolidate notes and confirm audit findings</li> </ul>	

Time	Element/Activity	Personnel
October 26, 2021	<b>Warehouse 2: Name is business confidential</b> <b>Lead Auditor: Eddie Gomez</b>	
8:30 a.m.	<b>Review of RSB Procedures</b> <ul style="list-style-type: none"> <li>- Confirm roles, responsibilities and processes (PO 5.1 -5.4)</li> <li>- Confirmation of scope of products to be certified (including other Certifications) (PO 6.3)</li> <li>- Client to outline process flow</li> <li>- Review site map(s); virtual tour, if possible</li> </ul>	Management
9:00 a.m.	<b>Document Review: Participating Operator/ Standards Checklist</b> <ul style="list-style-type: none"> <li>- Review of contract (PO 1.9)</li> <li>- Review of training procedures and records (PO 2.1.2)</li> <li>- Review of traceability method and implementation (including acquiring, handling, and forwarding sustainable material (PO 6.2.3, 6.5, 6.6)</li> <li>- Analysis of templates for material balances (PO 6.4)</li> <li>- Analysis of templates/procedures for transfer of sustainability information (PO 6.4.1, 6.4.2)</li> <li>- GHG: transport data is provided and included in UPM's GHGs (PO 9.4.2, 9.2.9- 9.2.11)</li> </ul>	Management

11:00 a.m.	<b>Report Writing</b> <ul style="list-style-type: none"> <li>- Auditor(s) take time to consolidate notes and confirm audit findings</li> </ul>	
11:30 a.m.	<b>Closing Meeting</b> <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>	Management

### Scope expansion audit 2: Warehouse 3 (name is business confidential)

Time	Element/Activity	Personnel
January 10, 2022	<b>Warehouse 3: Name is business confidential</b> <b>Lead Auditor: Eddie Gomez</b>	
1:30 p.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> </ul>	Management
2:30 p.m.	<b>Review of RSB Procedures</b> <ul style="list-style-type: none"> <li>- Confirm roles, responsibilities and processes (PO 5.1 -5.4)</li> <li>- Confirmation of scope of products to be certified (including other Certifications) (PO 6.3)</li> <li>- Client to outline process flow</li> <li>- Review site map(s); virtual tour, if possible</li> </ul>	Management
3:00 p.m.	<b>Document Review: Participating Operator/ Standards Checklist</b> <ul style="list-style-type: none"> <li>- Review of contract (PO 1.9)</li> <li>- Review of training procedures and records (PO 2.1.2)</li> <li>- Review of traceability method and implementation (including acquiring, handling, and forwarding sustainable material (PO 6.2.3, 6.5, 6.6)</li> <li>- Analysis of templates for material balances (PO 6.4)</li> <li>- Analysis of templates/procedures for transfer of sustainability information (PO 6.4.1, 6.4.2)</li> <li>- GHG: transport data is provided and included in UPM's GHGs (PO 9.4.2, 9.2.9- 9.2.11)</li> </ul>	Management
5:00 p.m.	<b>Report Writing</b>	

	- Auditor(s) take time to consolidate notes and confirm audit findings	
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## 2.3 Evaluation of Management System

### 2.3.1 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). Information in Appendix 2.

### 2.3.2 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?	None
If claims deviate from approved language in standard, signed document specifying claims approved by RSB:	None
Does Operator use RSB trademarks on off-product or on-product claims?	None

## 2.4 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.

### 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
UPM Biofuels S.A.	6	Low	August 2021	The auditor agrees
Overall Risk				6

### 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**

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	Major	Principle 3 (3.a.1, 3.a.2, 3.b.1), farm checklist 8, 10, 11	Data for actual GHG emissions not available at time of audit as harvest had not yet occurred  Closure evidence: An additional GHG audit was conducted on farms and was successfully completed	Closed  23 December, 2021
2021-2	Major	Farm Checklist #8 (all farm checklists)	Methodology and instrumentation used to calculate GHGs were not available at the time of audit (all farm checklists) as harvest had not yet occurred  Closure evidence: An additional GHG audit was conducted on farms and was successfully completed	Closed  23 December, 2021

## 5.0 CERTIFICATION DECISION

Certification Recommendation	
<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:	Farm production yields and GHG data are difficult to assess at the time of surveillance audit due to the audit scheduling. The surveillance audit is scheduled prior to harvest, and therefore data such as farm production yield and GHG data are not available at a predictable time. The GHG data were audited in a follow-up NC closure audit.

<b>To be completed by Certification Decision-Making Entity</b>	<b>Technical Review by:</b> If different to decision-maker	Surveillance audit: Robert Earley Scope Expansion 1: Robert Earley Scope Expansion 2: Robert Earley
	<b>Certification decision:</b>	Surveillance audit: Robert Earley Scope Expansion 1: Robert Earley Scope Expansion 2: Robert Earley
	<b>Certification decision by:</b>	Surveillance audit: Robert Earley Scope Expansion 1: Robert Earley Scope Expansion 2: Robert Earley
	<b>Date of decision:</b> For initial or continued certification	Surveillance audit: 23 December, 2021 Scope Expansion 1: 8 November, 2021 Scope Expansion 2: 18 January, 2022
	<b>Surveillance schedule:</b>	The next surveillance audit must occur no later than 5 October, 2022.  Notes: