

RSB – ROUNDTABLE ON SUSTAINABLE BIOMATERIALS

RSB Guidance on Certification of Group of Points of Origin under RSB Japan FIT certification scope

RSB Japan Fit Standard [RSB-STD-13-001]

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A. Objective

The objective of this guidance is to clarify the RSB requirements for certification of groups of points of origin of residues complying with the RSB Japan Fit Standard. The guidance includes the certification requirements applicable at group management level and group member level and notes for Certification Bodies regarding audit procedures.

B. Background

Group certification is a method that enables a number of producers who are facing scale or management challenges to access RSB certification. For individual points of origin of low value residues or end-of-life products, third-party certification is not always an economically viable option. The basic understanding of group certification is that a group of producers joins together to generate the necessary economies of scale to comply with the standard and system requirements. An appointed management unit will take over the responsibility of managing the certification process and putting the necessary systems in place to ensure the compliance of the individual group members under certification to the respective standard requirements. An external certification body will then assess the functioning of the group management system on a regular basis as well as the compliance of individual group members on a sample basis. Part of the responsibility of the group management is to conduct internal inspections of the certified members for monitoring their compliance with the standard.

C. Relevant standard references

RSB Standard for Japan FIT [RSB-STD-13-001]

RSB Procedure for Certification Bodies and Auditors [RSB-PRO-70-001]

D. Terms and definitions

For the purposes of this document, the terms and definitions given in the RSB Glossary of Terms RSB-STD-10-001 will apply. In addition, the following terms are applied:

Group certification of Points of origin: Group certification is a certification approach where RSB allows a group of producers to join together under a single RSB certificate organised under a common management system. The scope of group certification includes the group members where the residues are generated and for which there is an agreement between the group members and group management. Operations which trade products of the point of origin group members can be included in the scope of certification.

Group Management: The entity responsible for the certification process of a group of points of origin. It applies for certification, represents the group members to the RSB and a certification body and finally holds the RSB certificate.

Group Member: A member who participates in the group based on a formal agreement with the group management.

Note: in the present guidance, the group member is a CPO mill (point of origin of Palm Kernel Shell - PKS).

Initial inspections: The first internal inspection of group members, taking place before those sites can be included in the scope of certification.

Internal inspections: First party evaluation of the compliance of group members with the RSB standard requirements conducted by the staff of the group management. For the objective of the present guidance, it can be performed based on document review.

Internal inspectors: Group management staff conducting internal inspections and initial internal inspections.

Internal management system: A set of procedures which the group implements to ensure compliance with the RSB standard requirements.

Sanctions: An action taken by the group management towards group members as a result of a non-compliance to the RSB standard requirements.

E. Guidance

The scope of certification of points of origin includes the Group Members' and the entity responsible for the management of the group – the Group Management. For which there is an agreement between the group members and group management to include them in the scope of the certification.

Increasing the scope of certification to include additional Group Members can be done between audits, if the Points of Origin are similar to the points of origin that were subject to the previous audit in terms of type, material and geographic region. Changes in the scope of certification are reported prior to each external audit to the Certification Body. Information should at least include the name of the new Group Member, location, type of eligible material (PKS), estimated annual production and result of initial inspection performed by the Group Manager.

1. Group Management

1. 1. The Group Management shall be an organization or an individual representing the group and its members for the purpose of certification to the RSB Japan FIT Scheme. For example, the “First Collector” or a “Trader” can operate as a Group Management.
1. 2. The Group Management shall be responsible for compliance with the RSB requirements for all points of origin (group members) included in the scope of certification.
1. 3. The Group Management shall describe its roles and responsibilities which include at least an overall responsible manager and defines responsibilities for internal inspection and training.
1. 4. The staff of the Group Management shall possess the necessary capacities to fulfil their roles and responsibilities. Training shall be provided to the staff of the Group Management where necessary.
1. 5. The Group Management shall be responsible for informing all members in an appropriate way about the RSB requirements applicable to them.
1. 6. The Group Management shall ensure that all members have access to relevant information as well as the applicable RSB requirements.
1. 7. The Group Management shall respond adequately to questions or feedback raised by members.
1. 8. The Group Management shall establish an Internal Management System.

2. Group Members

2. 1. Group Members are points of origin of production residues or end-of-life materials (in this case, the CPO mills) and each shall have signed an agreement with the Group Management.

2. 2. The Group Management shall make sure that Group Members understand the implications of the agreement. The agreement shall contain at least:
 2. 2. 1. a commitment by the Group Member to fulfil the RSB requirements applicable for the points of origin included in the scope of certification;
 2. 2. 2. a commitment by the Group Member to provide the Group Management with required information;
 2. 2. 3. acceptance by the Group Member of internal and external inspections;
 2. 2. 4. an obligation for the Group Member to report intentional or unintentional non-conformities;
 2. 2. 5. a commitment by the Group Management to support the member to fulfil the applicable RSB requirements; and
 2. 2. 6. the right of members or Group Management to terminate membership according to pre-defined rules as documented in the Internal Management System (see Section 3).

3. Internal Management System (IMS)

3. 1. The Group Management shall implement an internal management system (IMS) to monitor the performance of members and ensure the compliance of the group and its members with the RSB requirements.
3. 2. The IMS shall consist of a set of procedures aiming to bring the group and all its members into compliance with this guidance and the RSB requirements. It includes sanctions in case of non-compliance observed at a Group Member level.
3. 3. The effective implementation of the IMS shall be monitored through internal inspections.

4. Internal Inspections (internal evaluations)

4. 1. Prior to all RSB audits by external auditors, internal inspections shall be conducted by Group Management of all points of origin to assess compliance against the applicable RSB requirements. The internal inspection expects:
 - the member to complete the RSB Screening Tool¹;
 - the member to complete the RSB Risk Assessment Tool²;
 - the member to complete its Self Evaluation against the RSB P&C checklist³;
 - the Group Management (internal inspectors) to verify the documents above and do the internal inspection to confirm the results;

¹ https://rsb.org/wp-content/uploads/2020/06/RSB-GUI-01-002-02_Screening-Tool-1.pdf

² https://rsb.org/wp-content/uploads/2020/08/RSB-Risk-Assessment-Tool-Version-3.2.1_Pilot-Period.xlsx

³ Please contact RSB for a copy of the current checklist (info@rsb.org)
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- the Group Management (internal inspectors) to document the results of internal inspections of each member.
- 4. 2. The schedule of internal inspections shall be designed by the responsible person in Group Management and shall take into consideration the risk of non-compliance of members.
- 4. 3. Internal inspectors shall be trained regarding the RSB requirements applicable to the points of origin.
- 4. 4. New group members operations shall always be internally inspected before they can be included in the scope of certification.
- 4. 5. If a non-compliance is observed, Group Management shall issue a corrective action request (CAR) to the responsible Group Member containing timelines for correction and sanctions where the CAR has not followed-up adequately, according to the procedures outlined in the Internal Management System (see section 3 of this guidance) and timeframes required by the RSB Procedure for Certification Bodies and Auditors [RSB-PRO-70-001].
- 4. 6. Group Members shall be excluded if the Corrective Action is not implemented as per the timeframe required by the RSB-PRO-70-001, section H.2.5 of the procedure.
- 4. 7. Group Members shall have the right to appeal findings of non-compliance.

5. Record-keeping

- 5. 1. Up to date records shall be maintained by Group Management, and shall be available for the external auditors, including at least the following:
 - 5. 1. 1. agreements between the Group Management and individual Group Members;
 - 5. 1. 2. updated Group Member list including at least the following information:
 - name of the Group Member;
 - a code assigned to each individual point of origin included in the scope of certification (a member can be responsible for more than one point of origin);
 - the location and size of each individual point of origin;
 - volume of certified production;
 - the industrial conversion (e.g., amount of palm fruits processed and amount of PKS generated as residues); and
 - dates of internal inspections.
 - 5. 1. 3. records of the traceability system, with evidence back to the point of origin: for collecting, selling and transporting certified products;
 - 5. 1. 4. internal inspection reports, including the updated Screening Tool and Risk Assessment tool for each Group Member;
 - 5. 1. 5. non-conformities, sanctions and corrective action requests arising from internal inspections;

5. 1. 6. training records; and
5. 1. 7. complaints and appeals.
5. 2. Records will be stored and kept for 5 years by the Group Management.

F. Chain of Custody

Chain of custody to follow the RSB Procedure for Traceability of RSB Certified Material [RSB-PRO-20-001].

Note: only Identity Preserved and Product Segregation are allowed by RSB Japan FIT Standard.

G. Communication and Claims

Communications and claims should follow the RSB Procedure on Communications & Claims [RSB-PRO-50-001].

H. Note to Certification Bodies

The RSB Procedure for Certification Bodies and Auditors [RSB-PRO-70-001] includes requirements for auditing points of origin under RSB Japan FIT Scheme (section H.1.5.).

For points of origin applying individually for certification, the RSB-PRO-70-001 requirements for main assessment of “individual audit on-site” is applied.

For points of origin organised under a Group Management, as described in this guidance, the main audit shall be on-site and cover the Group Management system and a risk-based sampling of Group Members (as per the sample size defined in the RSB-PRO-70-001).

All the other audit requirements shall follow the RSB-PRO-70-001.