

**RSB – ROUNDTABLE ON SUSTAINABLE BIOMATERIALS**

**RSB Proactive Guidance on  
the Voluntary exemption from GHG requirements for  
mechanical operators processing polymers**

**RSB Standard for Advanced Products**

**RSB-STD-02-001**

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## 1. OBJECTIVE

The objective of this guidance is to specify the circumstances under which mechanical operators<sup>1</sup> may be voluntarily exempt from the GHG requirements of the RSB Advanced Products Standard.

## 2. BACKGROUND

The RSB Advanced Products Standard F.2.2.1 requires that **final products** should achieve at least 10% lower greenhouse gas emissions relative to a comparable fossil product.

In the case of plastic products, a simplified typical supply chain may look as follows:



Where sustainable polymers replace fossil-based polymers in a final product, the GHG emission reduction is created during stages 1 – 3 of the above diagram. At step 4, the manufacture of a final product remains the same whether the product contains sustainable or fossil polymer, as the polymers are chemically identical and interchangeable.

It follows that including step 4 *Plastics manufacture* in the GHG calculation does not add strength to a comparative GHG claim as this stage of a product's manufacture is not altered by the sustainable material substitute.

Further, RSB's growing experience working with plastics manufacturers finds that the large number of operators in this category typically have low expertise in GHG

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<sup>1</sup> RSB defines mechanical operators as a *subgroup of industrial operators only conducting mechanical or physical processing*. For the current positive list of mechanical operators, please refer to PG-2020-03.

calculation. This is resulting in a certification bottleneck for RSB<sup>2</sup>, and risks obstructing the up-take of certification by plastics manufacturers, limiting the availability of RSB-certified material in consumer-facing products.

However, RSB recognises that there may be instances where an operator, such as the manufacturer of branded products, would like a final product to carry a GHG claim which captures the full supply chain emissions, including transport and final manufacturing processes. This could be the case, for example, for larger brands with commitments to GHG emission reductions in their product supply chains, for whom a complete product GHG calculation from cradle to grave is important.

RSB also recognises the need for full transparency in communicating GHG values and emission savings, so as to avoid instances where GHG values are criticised for not capturing a product's full impact. For example, an RSB certified plastic bottle carrying an RSB GHG value in its claim must clearly communicate which material the GHG value applies to.

### 3. GUIDANCE

To ensure that the RSB Standard for Advanced Products can continue to meet the potential need for full product lifecycle GHG claims, whilst ensuring that RSB requirements do not present unnecessary burden in some specific situations, RSB proposes the following Guidance on GHG calculation:

#### 3.1 Guidance related to GHG reduction requirement

##### **Current requirement:**

**RSB Standard for Advanced Products (RSB-STD-02-001) F.2.2.1** requires that final products should achieve at least 10% lower greenhouse gas emissions relative to a comparable fossil product.

##### **Proposed clarification:**

For plastic products, the polymer can be defined as the final product, i.e. POs downstream in a polymer supply chain may voluntarily decide to exclude GHG calculation from their certification scope. In order to implement this, the following requirements must be fulfilled:

1. Confirm with RSB that the manufacturer fits in the classification of a “mechanical operator”
2. Where a plastic manufacturer (defined as a mechanical operator under RSB) chooses to define the polymer as the final product, this must be clearly stated

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<sup>2</sup> The capability to make a GHG calculation in-house, or to out-source this activity, combined with the high audit cost due to GHG expert time, has been identified as a barrier to the uptake of RSB certification by RSB Certification Bodies.

on the Proof of Sustainability to ensure that all downstream users of their material also:

- a. exclude GHG emissions from their scope of certification; and
  - b. define the polymer as the final product.
3. Any GHG claims made (on or off-product) relating to an end-product containing the polymer which has been defined as the final product must specify that the GHG emission reduction relates to the polymer.

***e.g. The LDPE in this bottle creates x% GHG emissions savings compared with fossil-based LDPE***

### **3.2 Guidance related to claims**

#### **Current requirement:**

**RSB Standard for Advanced Products (RSB-STD-02-001) F.6.4** requires that in the event that the scope of certification does only cover one component of the product, the operator shall only use an on-product claim if the certified component represents at least 50% of the total mass content of the product.

If the certified component is less than 50% of the total mass content of the product, then the product claim on the product shall be related to the respective product component.

#### **Proposed clarification:**

In addition to requirement F.6.4, in the event that the scope of certification does not include GHG calculation, the operator shall ensure that for any GHG claims made (on- or off- product), whatever the mass content of the polymer in the product, it shall be clearly stated that the GHG claim relates to the polymer.

### **3.3 Guidance related to the scope of this exemption**

This Guidance is limited to mechanical operators whose RSB-certified materials in the scope of certification are polymers. However, in principle a similar approach can be applied to other intermediate product types when the supply chain GHG savings occur upstream and the intermediate product is “drop-in” (interchangeable with the fossil alternative). In such cases if mechanical operators wish to apply for GHG exemption, the Certification Body must request an exemption directly from the RSB secretariat. RSB will inform the Certification Body of the decision.