

# Surveillance Evaluation Report

*Roundtable on Sustainable Biomaterials  
Global/Advanced Products  
INEOS Europe AG - Phenol Division*

**SCS Certificate Code: SCS-RSB/PC-0044**

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Switzerland

Peggy Gerits

<https://www.ineos.com/businesses/ineos-phenol/>

CERTIFIED	EXPIRATION
9 July 2021	8 July 2026

DATE(S) OF AUDIT
26-29 April 2022
DATE OF LAST UPDATE
27 July 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	INEOS Europe AG – Phenol Division		
Operator Number	2188		
Contact person	Gerits, Peggy		
Address	Avenue des Uttins 3 1180 Rolle Switzerland	Telephone	Mobile: +32 473 812264
		Fax	/
		e-mail	<a href="mailto:peggy.gerits@ineos.com">peggy.gerits@ineos.com</a>
		Website	<a href="https://www.ineos.com/businesses/ineos-phenol/">https://www.ineos.com/businesses/ineos-phenol/</a>

#### 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 checked="" type="checkbox"/> Initial Assessment: INEOS Cumene <input type="checkbox"/> Re-certification <input type="checkbox"/> Follow-Up to NCs	<input checked="" type="checkbox"/> 1st Annual Surveillance: (INEOS Styrenics GmbH, INEOS Phenol GmbH, INEOS Phenol Belgium NV) <input type="checkbox"/> 2nd Annual Surveillance <input type="checkbox"/> 3rd Annual Surveillance <input type="checkbox"/> 4th Annual Surveillance
Scope as it appears on certificate:	Main Office, 4 Industrial Operators, 3 Warehouses	
The scope assessment agrees with the scope under which the operator applied	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

##### 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	<ul style="list-style-type: none"> <li>- 1 Head-Office (INEOS Europe AG – Phenol Division, Switzerland).</li> <li>- 2 Cumene production plants: INEOS Styrenics GmbH, Marl Germany + INEOS Cumene, Marl, Germany (under construction)</li> <li>- 2 Phenol production plants (INEOS Phenol GmbH, Germany + INEOS Phenol Belgium NV)</li> <li>- 3 external storage providers (see appendix)</li> </ul>
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Participating Operator Risk Class	Low
Disputes or prior Non-compliances	None, for the units in question that were either brought to the auditor’s attention or that he came across through internet searches.

### 1.2.2 Standards Used

#### Applicable RSB-Accredited Standards

Standard Name and Version
• RSB Principles & Criteria (RSB-STD-01-001 V3.0)
• RSB Procedure for Traceability (Chain of Custody) (RSB-PRO-20-001 V3.2)
• RSB Standard for Participating Operators (RSB-PRO-30-001 V3.3)
• RSB Procedure for Communication and Claims (RSB-PRO-50-001 V3.5)
• RSB Procedure for Risk Management (PRO-PRO-60-001 V3.3)
• RSB Standard for Advanced Products RSB-STD-02-001 V 2.0)
• 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 Industrial Operator/ Mechanical Processor

1.	
Name of Facility	INEOS Styrenics GmbH
Type	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Vegetable oil Extraction <input type="checkbox"/> Biofuel Production and/or Distribution <input checked="" type="checkbox"/> Other, please explain here: Cumene production plant
Location/City	Paul-Baumann-Straße 1 45764 Marl Germany
Geographic location ( <i>Latitude &amp; Longitude</i> )	51.681320455877724, 7.100341456126241
Start date of operations (initial start date)	On the current plot of land ( <i>Baufeld</i> ) within the Chemiepark Marl: in 1984 the alkylation plant and in 1989 the distillation plant. (Not yet under company name of INEOS, who took over in 2005 only).  (A cumene unit was first built already in 1955 at the Marl chemical complex, yet on a different <i>Baufeld</i> )

Number of processing steps	1) alkylation (+ transalkylation) 2) distillation
Description of the product or the product component that the certification covers, including, if applicable, the specification of the mass of the certified component related to the total product.	Synthesis of benzene and propylene (two inputs) → Cumene (1 output)  Cumene as intermediate is used for production of phenol, acetone and AMS (see plants below).
<b>Annual throughput of previous 12 months (Commercially sensitive – see appendix)</b>	

<b>2.</b>	
<b>Name of Facility</b>	INEOS Cumene GmbH
<b>Type</b>	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Vegetable oil Extraction <input type="checkbox"/> Biofuel Production and/or Distribution <input checked="" type="checkbox"/> Other, please explain here: Cumene production plant
<b>Location/City</b>	Paul-Baumann-Straße 1 45764 Marl Germany
<b>Geographic location (Latitude &amp; Longitude)</b>	51.681320455877724, 7.100341456126241
<b>Start date of operations (initial start date)</b>	The INEOS Cumene GmbH plant (also named as INCA unit) is currently under construction.
Number of processing steps	1) alkylation (+ transalkylation) 2) distillation
Description of the product or the product component that the certification covers, including, if applicable, the specification of the mass of the certified component related to the total product.	Synthesis of benzene and propylene (two inputs) → Cumene (1 output)  Cumene as intermediate is used for production of phenol, acetone and AMS (see plants below).
<b>Annual throughput of previous 12 months (Commercially sensitive – see appendix)</b>	

<b>3.</b>	
<b>Name of Facility</b>	INEOS Phenol GmbH
<b>Type</b>	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Vegetable oil Extraction

	<input type="checkbox"/> Biofuel Production and/or Distribution <input checked="" type="checkbox"/> Other, please explain here: Phenol, Acetone, AMS production plant
Location/City	Dechenstraße 3 45966 Gladbeck Germany
Geographic location ( <i>Latitude &amp; Longitude</i> )	51.59710123352151, 6.9691447677652985
Start date of operations (initial start date)	1954 (not under INEOS, but under a different company, Phenolchemie)
Number of processing steps	(Hock process) 1) Cumene oxidization → cumene hydroperoxide (CHP) 2) CHP concentration 3) Cleavage of CHP to yield phenol and acetone 4) Neutralization 5) Distillation & purification
Description of the product or the product component that the certification covers, including, if applicable, the specification of the mass of the certified component related to the total product.	Cumene (one input) → Phenol, Acetone, AMS (three outputs)
<b>Annual throughput of previous 12 months (Commercially sensitive – see appendix)</b>	

4.	
Name of Facility	INEOS Phenol Belgium NV
Type	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Vegetable oil Extraction <input type="checkbox"/> Biofuel Production and/or Distribution <input checked="" type="checkbox"/> Other, please explain here: Phenol, Acetone, AMS production plant
Location/City	Geslecht 1 9130 Beveren Belgium
Geographic location ( <i>Latitude &amp; Longitude</i> )	51.29118305864911, 4.272539102577031
Start date of operations (initial start date)	1993
Number of processing steps	(Hock process) 1) Cumene oxidization → cumene hydroperoxide (CHP) 2) CHP concentration 3) Cleavage of CHP to yield phenol and acetone 4) Neutralization 5) Distillation

Description of the product or the product component that the certification covers, including, if applicable, the specification of the mass of the certified component related to the total product.	Cumene (one input) → Phenol, Acetone (two outputs)
<b>Annual throughput of previous 12 months (Commercially sensitive – see appendix)</b>	

**1.3.2 Warehouses (see appendix – commercially sensitive – see appendix)**

**1.4 GHG Intensity**

GHG emission associated with this product are considered commercially sensitive information and may be requested from INEOS Europe – Phenol Division. GHG calculations have been verified by SCS Global Services as part of this RSB Certification audit.

**1.5 Advanced Product Information**

<b>If the feedstock for a batch of RSB certified Advanced Product is not wholly but only partly RSB-certified: state the amount of certified feedstock in relation to the total mass of the feedstock for the appropriate category:</b>	<b>N/A no RSB activity here yet</b>
<b>For Category III products:</b>	
<b>State the amount of primary fossil resources saved by the input of eligible feedstock in the production system</b>	<b>N/A no RSB activity here yet</b>

**2.0 EVALUATION PLANNING & PROCESS**

**2.1 Audit Team**

<b>Auditor Name:</b>	Miguel Ruiz	<b>Auditor role:</b>	Lead Auditor
<b>Qualifications:</b> Miguel is a certified auditor against sustainability schemes including RSB, ISCC, and ISO 14001, ISO 19011 and experienced LCA practitioner. Previously he worked as researcher in the decarbonization of energetic system at the French National Centre of Scientific Research (CNRS, France). He obtained a PhD in chemical engineering working on the topic of biomass co-refining at the French Agricultural Research Centre for International Development (CIRAD, France). He holds an advanced academic degree in Chemical Engineering from the University of Granada (Spain) and several specialization courses on LCA, carbon footprint, GIS and renewable energy.			
<b>Auditor Name:</b>	Adela Lasa	<b>Auditor role:</b>	Team Auditor
<b>Qualifications:</b> Adela is currently being certified as an Auditor against RSB and ISCC sustainability schemes. She has multi-sector experience, mainly through various innovation projects and multi-stakeholder sustainability related projects. She has a Bachelor's and Master's Degree in Industrial Engineering from the Pontifical University of Comillas (ICAI), Spain, and a Master's Degree in Environmental Services Management and Engineering from the transnational company Veolia Environment and the Université Cergy-Pointoise, France.			
<b>Auditor Name:</b>	Otavio Cavalett	<b>Auditor role:</b>	GHG Verifier



**Qualifications:** 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 Biorenovables 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 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.

### 2.2.2 Evaluation Itinerary and Activities

Time	Element/Activity
Pre-audit	<b>Stakeholder consultation new Marl-Cumene unit</b> Conducted by e-mail and/or phone prior to audit Auditor: Miguel Ruiz (lead auditor) and Adela Lasa (team auditor + translator)

<b>Date: April 26, 2022</b> - Meeting room at INEOS-phenol Gladbeck plant Miguel Ruiz (Lead auditor), Adela Lasa (team auditor, in training)	
Operation(s)/ sites visited	Activities/ notes
General opening meeting	General requirements, Introduction by all attendees, review of the scope and scheduled activities, company presentation, certification details, updates and follow-up on corrective actions.
Review shared elements	Review of shared elements for the 4 INEOS phenol sites. Traceability and chain of custody, Grievance mechanism, GHG calculation methodology, Communication & Claims
INEOS-phenol Gladbeck plant audit	Document review, Principles and criteria (1, 2, 7, 9, 10, 11) site walk-through
<b>Date: April 27, 2022</b> - meeting room at INEOS-phenol Styrenics plant Miguel Ruiz (Lead auditor), Adela Lasa (team auditor and translator, in training)	

Operation(s)/ sites visited	Activities/ notes
INEOS-phenol Styrenics plant audit	Document review, Principles and criteria (1, 2, 7, 9, 10, 11), site walk-through
<b>Date: April 28, 2022</b> - meeting room at INEOS-phenol Gladbeck plant Miguel Ruiz (Lead auditor), Adela Lasa (team auditor and translator, in training)	
Operation(s)/ sites visited	Activities/ notes
INEOS-phenol Cumene plant audit	Document review, Principles and criteria (1, 2, 4, 7, 9, 10, 11, 12), site walk-through
External storage n°1	Document review
External storage n°2	Document review
<b>Date: April 29, 2022</b> - meeting room at INEOS-phenol Antwerp plant Adela Lasa (Lead auditor and translator, in training), Miguel Ruiz (Team auditor),	
Operation(s)/ sites visited	Activities/ notes
INEOS-phenol Antwerp plant audit	Document review, Principles and criteria (1, 2, 7, 9, 10, 11), site walk-through
External storage n°3	Document review
<b>Date: May 6, 2022</b> - Remote (online) Miguel Ruiz (Lead auditor), Adela Lasa (team auditor and translator, in training)	
Operation(s)/ sites visited	Activities/ notes
General closing meeting	

NB: The audit plans of the external storage providers are not copied here so as not to disclose any commercially sensitive information of other parties involved. A complete agenda is included in appendix 7.

### 2.2.3 Evaluation of RSB compliance claims and use of RSB trademarks

<p><b>Are all claims used in line with scope and allowed claims per RSB-PRO-50-001 or Advanced Product Standard, as applicable?</b></p>	<p>INEOS Phenol is a producer of intermediate petrochemical products, to be used in further production in a wide variety of products and industries. The responsible staff for RSB certification anticipate that claims will predominately reside in marketing materials, such as corporate newsletters or presentations, but also on invoices and PoS</p> <p>For incoming materials (benzene + propylene), the claims associated with the batches will have been defined by contracts / purchase agreements with the supplier INEOS Europe AG. Whether it's "bio-attributed" or "recycled (plastic) attributed", the chain of custody rules apply, and on the outbound side the product-batches shall carry the same claims as on the inbound side.</p>
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	Staff are aware that for the creation of any claims – be in press releases or on outgoing invoices – RSB Procedure on Communication and Claim (RSB-PRO-50-001) will have to be consulted. This is also spelled out in Section 12 - Procedure for RSB Claims - of their RSB Handbook.
<b>If claims deviate from approved language in standard, signed document specifying claims approved by RSB:</b>	No purchase/sales of RSB certified material done so far. Requirements are understood.
<b>Does Operator use RSB trademarks on off-product or on-product claims?</b>	No trade of RSB certified material yet. On-product claims are unlikely as the company has only B2B sales and manufactures no consumer-facing products.

### 2.3 Stakeholder Consultation Process (for Main audits): INEOS Cumene GmbH

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.

#### 2.3.1 Summary of Stakeholder Comments and Responses (for Main audits)

Stakeholder Comments	SCS Response
<b>Economic Concerns</b>	
None received	
<b>Social Concerns</b>	
None received	
<b>Environmental Concerns</b>	
None received	

### 3.0 RISK ASSESSMENT RESULTS

#### 3.1.1 Risk Class

Note: For multi-site operations, the 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
INEOS Styrenics GmbH (Marl)	0	low	April 2022	0 (Auditor concurs)
INEOS Cumene GmbH (Marl)	0	low	April 2022	0 (Auditor concurs)
INEOS Phenol GmbH (Gladbeck)	0	low	April 2022	0 (Auditor concurs)
INEOS Phenol Belgium NV (Beveren)	0	low	April 2022	0 (Auditor concurs)
Overall Risk				LOW

#### 3.1.2 Risk Impact on Certificate Validity

	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

### 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 REDACTED Non-compliances and Current Status**

Full content in Confidential Appendix 6

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)
2022-1	Minor NC	RSB-STD-30-001 Global Checklist: requirement 1.8; Warehouse	The INEOS contracts with [warehouse] as operator/storage provider does not explicitly include a clause for [warehouse] to comply with RSB Standards and procedures, nor an unrestricted access. New contracts	Open

		Checklist: Requirement 1.7	drawn up do not include any clause about compliance with RSB Standards and procedures.	
2022-2	Opportunity for improvement	RSB-PRO-20-001 requirement F.3.4.8 8.3.7 of INEOS Cumene GmbH checklist: RSB tab	Conversion factors for intermediate flowmeters at [warehouse] are not supported by calibrated tools. These meters are not critical to traceability.	Open
2022-3	Opportunity for improvement	RSB-STD-30-001 and requirement 1.10 checklists for all 4 sites.	Although the self-evaluation was complete, it could be more comprehensive in the future to provide better transparency into the audit outcomes.	Open

## 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 type="checkbox"/> No <input type="checkbox"/> <b>No Major NCs issued</b> <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:		
<b>To be completed by Certification Decision-Making Entity</b>	<b>Technical Review by:</b> If different to decision-maker	Inna Kitaychik, Rob Earley
	<b>Certification decision:</b>	Certificate granted under the standards and procedures listed in section 1.2.2
	<b>Certification decision by:</b>	Inna Kitaychik
	<b>Date of decision:</b> For initial or continued certification	7 July 2022
	<b>Surveillance schedule:</b>	Next Surveillance audit must occur by 26 April 2023
Notes:		