

Certification Evaluation Report

Roundtable on Sustainable Biomaterials

Global – Advanced Product

INOVYN Europe Ltd

SCS Certificate Code: SCS-RSB/PC-0045

Banks Lane Office, Banks Lane, PO Box 9, Runcorn, Cheshire, WA7 4JE, United Kingdom

Contact: Kyren Routledge

<https://www.inovyn.com/locations/tavaux/>

CERTIFIED	EXPIRATION
16 November, 2021	15 November, 2026

DATE(S) OF AUDIT
23-25 August, 2021
DATE OF LAST UPDATE
11 November, 2021

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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.

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	INOVYN Europe Ltd		
Operator Number	2198		
Contact person	Kyren Routledge		
Address	Bankes Lane Office, Bankes Lane, PO Box 9, Runcorn, Cheshire, WA7 4JE, United Kingdom	Telephone	+44 (0) 78800 68780
		Fax	
		e-mail	kyren.routledge@ineos.com
		Website	www.inovyn.com
Nature of Involvement:			
First Collector and Trader of Bio-attributed Epichlorohydrin			

1.1.2 Additional Parties Involved (See confidential index for other involved parties)

Organization name	INOVYN France SAS		
Contact person	Kyren Routledge		
Address	6 avenue de la Republique 39500 Tavaux France	Telephone	+44 (0) 78800 68780
		Fax	
		e-mail	kyren.routledge@ineos.com
		Website	https://www.inovyn.com/locations/tavaux/
Nature of Involvement:			
Manufacturer of Bio-attributed Epichlorohydrin			

Organization name	INOVYN Trade Services		
Contact person	Kyren Routledge		
Address	Avenue des Olympiades 20, 1140 Brussels, Belgium	Telephone	+44 (0) 78800 68780
		Fax	
		e-mail	kyren.routledge@ineos.com
		Website	https://www.inovyn.com/locations/tavaux/
Nature of Involvement:			
Trader of Bio-attributed Epichlorohydrin			

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 <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 type="checkbox"/> 4th Annual Surveillance
Scope as it appears on certificate:	<ul style="list-style-type: none"> • First Collector and Trader of refined bioglycerine • Industrial Processor producing bio-attributed Epichlorohydrin from refined bioglycerine • Trader of Bio-attributed Epichlorohydrin • Back-to-back glycerol traders: 2 (confidential information) • Point of Origin: 1 (confidential information) 	
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>		
Total workers covered by scope of certification:	77	

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	1 First Collector and sales entity 1 Industrial processor of Bio-attributed epichlorohydrin 2 Glycerine traders (Back-to-back) 1 Point of Origin 1 additional sales entity
Participating Operator Risk Class	Low
Disputes or prior Non-compliances	None

1.2.2 Standards Used

Applicable RSB-Accredited Standards

Standard Name and Version
<ul style="list-style-type: none"> • RSB Principles & Criteria (RSB-STD-01-001 V3.0); • RSB Chain of Custody (RSB-PRO-20-001 V3.3) • RSB Standard for Participating Operators (RSB-PRO-30-001 V3.2); • 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); • RSB Standard for Advanced Fuels (RSB-STD-01-010 V2.3) • RSB Standard for Advanced Products (RSB-STD-02-001 V 2.0)

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

Name of Facility	INOVYN France SAS
Type	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Biofuel Production and/or Distribution <input type="checkbox"/> Vegetable oil Extraction <input checked="" type="checkbox"/> Other, please explain here: Bio-attributed epichlorohydrin plant
Location/City	Tavaux, France
Geographic location (<i>Latitude & Longitude</i>)	47.0555, 5.402
Start date of operations (initial start date)	1962
Number of processing steps	Glycerine route 2 steps: Glycerine --> Epicerol/Dichloropropanol --> Epichlorohydrin Fossil (Allyl Chloride) route 3 steps: Propylene --> Allyl Chloride --> Dichloropropanol --> Epichlorohydrin
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.	Bio-attributed epichlorohydrin, marketed as REODRIN, made from a combination of fossil and bio-dichloropropanol reacted in a final step to produce bio-attributed epichlorohydrin

1.3.2 Traders or Warehouses: In confidential Annex

1.3.3 Points of Origin: In confidential Annex

Number of Points of Origin in Scope	1
Number of Points of Origin providing more than ten metric tons per months	1
Number of Points of Origin Assessed on a Sample Basis during This Audit	1
List of Points of Origin Assessed on a Sample Basis during This Audit	1

1.4 GHG Intensity

Advanced products from Category III feedstocks:			
Advanced Product:	Bio-attributed epichlorohydrin	GHG:	1.40 kg CO2e/kg Epichlorohydrin
<i>Add more lines as you see fit</i>			

1.5 Advanced Product Information

(Can be moved to appendix if certain information is confidential)

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:	Feedstock for bio-attributed ECH is planned to be 100% RSB Certified (initial audit)
For Category III products:	
State the amount of primary fossil resources saved by the input of eligible feedstock in the production system	Bio-attributed material replaces 100% of fossil feedstock (mass balance basis)

2.0 EVALUATION PLANNING & PROCESS

2.1 Audit Team

Auditor Name:	Robert Earley	Auditor role:	Lead Auditor
Qualifications: Rob Earley is a certified RSB auditor and ISCC auditor based in Beijing, China. He studied at the Beijing International Studies University and received his Master’s degree in environmental studies at the University of Waterloo, in Waterloo, Ontario, Canada. Mr. Earley is an expert on sustainable biofuel projects. He has worked on projects involving incorporating biofuel-based vehicles into diesel fleets and linking sustainable biodiesel projects with food safety and elimination of used cooking oil as a waste to improve sustainability of urban and inter-urban transport systems. He has also worked on several air quality projects for transit systems in China.			

Auditor Name:	Marie-Luce Chevalier	Auditor role:	English-French Translator
Qualifications: Dr. Marie-Luce Chevalier is an associate professor at the Institute of Geology, Chinese Academy of Geological Sciences in Beijing China. A native of Belgium, she is fluent in English, French and Mandarin Chinese. Dr. Chevalier’s research focuses on mapping of active tectonic faults in Tibet, Xinjiang and Sichuan, China.			
Auditor Name:	Justin Richter	Auditor role:	GHG Verifier
Qualifications: Dr. Richter is a Life Cycle Analysis practitioner and Supply Chain researcher in the areas of biofuels, renewable energy, advanced products, and social impacts. He holds GHG certification from ISCC. Dr. Richter has received a Ph.D. in Environmental and Ecological Engineering from Purdue University (West Lafayette, IN, USA).			

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
Day 1 23 August 2021	INOVYN France SAS Remote audit: Microsoft Teams Auditor: Robert Earley	

<p>8:30 a.m.</p>	<p>Opening Meeting and General Requirements</p> <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff - Review of scheduled activities - Review of RSB Procedures; confirm roles, responsibilities and processes - Confirmation of scope of products to be certified - Clarification of all suppliers; i.e. point of origin, transportation and traders, storage - Client to outline production process and overall process flow - Review site map(s) - Review Risk Assessment - Review Screening Tool - Agree on staff to be interviewed in the afternoon – please provide a list of on-duty facility staff on 23 August. Ideally, those staff who can speak English if possible. 	<p>Management, including relevant senior management</p>
<p>9:00</p>	<p>Document Review: Participating Operator/ Standards Checklist</p> <ul style="list-style-type: none"> - Review of training procedures and records – provide records of RSB competency such as chain of custody management, data recording, material handling, claims management, etc. - Review of public Grievance Mechanism – how can community members file complaints/grievances against the facility? Is there a recording system in place, and what is the procedure for handling such complaints? - Review of traceability method and implementation (including acquiring, handling, and forwarding sustainable material) - Analysis of material balances and records – Initial audit requires a review of template documents to ensure they are operable. - Review of records – Initial audit requires a review of record templates including for incoming material, material handling, and outgoing material / Proof of Sustainability forms - Review of GHG inputs - Communications and Claims - Requirement for Advanced Fuels/ Advanced Products 	<p>RSB management representative</p> <p>Staff in charge of traceability and record production/record management</p> <p>Staff in charge of local public relations</p> <p>Production engineer (to review GHG inputs)</p>
<p>11:00</p>	<p>Site Observation: Please provide maps, high resolution photographs</p> <ul style="list-style-type: none"> - Observe operations at processing facility including control room, clear photos of control room screens - Observe feedstock and product storage area - Observe chemical storage and disposal - Observe waste repository or disposal - Observe weigh scale / flow meters and calibration records – please provide high resolution photographs 	<p>RSB Management representative</p> <p>Production management</p>
<p>1:00</p>	<p>Lunch Break</p>	
<p>2:00</p>	<p>Worker Interviews</p> <ul style="list-style-type: none"> - Auditor to interview three workers via remote meeting. <u>Please establish a private office where workers may privately meet with the auditor online. At least one person should be a labour union representative</u> - Check labour practices, health and safety compliance, training, grievances, equality issues, etc. 	<p>Workers without the presence of management</p>

<p>2:45</p>	<p>Document Review: Compliance with Principles and Criteria and Review of ESMP</p> <p>Principle 1:</p> <ul style="list-style-type: none"> - Review of all relevant business licenses - Review of land and water use permits <p>Principle 2:</p> <ul style="list-style-type: none"> - Review environmental and social management plan - Review impact assessments, if applicable – most recent Environmental Impact Assessment, Social Impact Assessment - Review stakeholder engagement records – when did stakeholder engagement occur? <p>Principle 4:</p> <ul style="list-style-type: none"> - Work conditions, piece work and living wage, equality issues, unions - Review of contracts, policies and training records grievances – ensure that contracts for all employees are accessible. - Training and occupational health and safety record – ensure that training records and training plans for all employees are accessible - Records for freedom of association mechanism – how is the right to unionize guaranteed on-site? <p>Principle 7:</p> <ul style="list-style-type: none"> - Conservation values, ecosystems, buffers, water rights <p>Principle 9:</p> <ul style="list-style-type: none"> - Water permits, water management in ESMP with particular attention on management of Canal du Rhône au Rhin <p>Principle 10:</p> <ul style="list-style-type: none"> - Air permits, air management in ESMP <p>Principle 11:</p> <ul style="list-style-type: none"> - Use of technology: pesticides and Stockholm convention chemicals - Integrated waste management - Resource and energy usage, and efficiency <p>Principle 12:</p> <ul style="list-style-type: none"> - Review documentation of historic land use/land tenure, legal tenure 	<p>RSB Management</p> <p>Environmental management staff</p> <p>Human Resources representative</p> <p>Environmental management staff</p>
<p>4:45</p>	<p>Report Writing</p> <ul style="list-style-type: none"> - Auditor(s) take time to consolidate notes and confirm audit findings 	
<p>5:00</p>	<p>Initial findings meeting</p>	
<p>5:30</p>	<p>End of Day 1</p>	
<p>Day 2 DAugust 25, 2021</p>	<p>Point of Origin ecoMotion GmbH – Microsoft Teams meeting Auditor: Robert Earley</p>	
<p>9:00 a.m.</p>	<p>Opening Meeting and General Requirements</p> <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff - Confirm roles, responsibilities and processes - Confirmation of scope of products to be certified 	<p>Management Point of Origin staff</p>
<p>9:30</p>	<p>Document Review: Participating Operator/ Standards Checklist</p> <ul style="list-style-type: none"> - Review of eligibility of material 	<p>Management</p>

	<ul style="list-style-type: none"> - Review of process flows and feasibility of production including production yield and total sales of refined glycerine, ensure adequate vegetable and UCO feedstock utilized to produce claimed refined glycerine (no palm oil glycerine allowed to be claimed) - Review of declarations of outgoing material - Review of feedstock specific requirements 	Point of Origin staff
11:00	Site Observation <ul style="list-style-type: none"> - Observe site map and photographs of site: biodiesel reactor and glycerine refining unit 	Point of Origin staff
11:20	Report Writing Auditor(s) take time to consolidate notes and confirm audit findings	Auditor
12:00	Findings <ul style="list-style-type: none"> - Presentation of all non-compliances and opportunities for improvement 	Management Point of Origin staff
5:30	Overall audit Closing Meeting – Auditor, Robert Earley <ul style="list-style-type: none"> - Presentation of General audit finding - Presentation of all non-compliances and opportunities for improvement - Fix timetables for corrective actions - Reiterate SCS appeal policy - Questions 	Management including relevant senior management
	End of Audit	

2.3 Evaluation of Management System

2.3.1 Capacity of the participating operator to implement its management systems

See confidential annex 2 for details.

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?	Yes
If claims deviate from approved language in standard, signed document specifying claims approved by RSB:	
Does Operator use RSB trademarks on off-product or on-product claims?	No

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.

2.4.1 Summary of Stakeholder Comments and Responses (for Main audits)

Stakeholder Comments	SCS Response
Economic Concerns	
None	
Social Concerns	
None	
Environmental Concerns	
Concerns were raised about mercury run-off from the Tavaux site affecting downstream fisheries	Mercury was produced as a pollutant at the Tavaux site before 2012. In 2012, when INOVYN took ownership of the facilities, the units that produced such pollution were decommissioned or significantly modified such that this pollution is no longer emitted. Downstream fisheries may be used by individual users, but may not be commercially fished, and are monitored by government authorities.

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
INOVYN France SAS (Tavaux)	3	Low	8 August, 2021	Agrees with assessment
Overall Risk				Low

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.
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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	RSB-STD-11-001, G4.3.5, G4.3.6, Checklist 9.3.3	<p>The product yield from a test run of Epicerol-only production did not clearly match the product yield of Epicerol and CAL operation resulting in uncertainty about the product LCA calculations.</p> <p>RCA submitted 19 October 2021 Closed 19 October 2021: "RSB Summary Document" including ESMP updated to reflect 2019 data conversion factors. The Conversion factors are consistent with the LCA conducted for GHG emissions based on 2019 data.</p>	Closed
2021-2	Observation	Principle 2.b.2	The communication with stakeholders and community members has been delayed due to COVID in the past period of time, and could be improved when conditions allow.	Open

5.0 CERTIFICATION DECISION

Certification Recommendation	
For Initial and Re-certifications: Operator to be awarded RSB certification subject to the minor non-compliances stated in Section 4.2.5.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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.	Yes <input 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:		
To be completed by Certification Decision-Making Entity	Technical Review by: If different to decision-maker	Inna Kitaychik
	Certification decision:	Certification against standards listed in Section 1.2.2
	Certification decision by:	Inna Kitaychik
	Date of decision: For initial or continued certification	November 16, 2021
	Surveillance schedule:	By November 16, 2022
		Notes:

Sub Certificate Codes (if applicable)

Legal Entity/Operational Site	Sub-Certificate Code