

Certification Evaluation Report

Roundtable on Sustainable Biomaterials

Global and RSB EU RED

SSGE Bio-Energy Company Limited

SCS Certificate Code: SCS/RSB-PC-0046

1/F, Block B, Cheung Wah Factory Building, 39-41 Sheung Heung Road, Tokwawan, HongKong

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<http://ssbe-energy.com/en/introduction/>

CERTIFIED	EXPIRATION
3 December 2021	2 December 2026

Dates of Initial RSB Global Audit
11-18 October, 2021
Dates of EU RED Scope Extension and peanut shell material audit (onsite)
8-22 August, 2022
DATE OF LAST UPDATE
25 November, 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.

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	SSGE Bio-Energy Co. Ltd		
Operator Number	2158		
Contact person	Dr. Dennis Lai		
Address	1/F, Block B, Cheung Wah Factory Building, 39-41 Sheung Heung Road, Tokwawan, Hong Kong	Telephone	+44-7545962739
		Fax	
		e-mail	dennis.lai@hiplikagri.com
		Website	

1.2 Scope of Certificate

Please select one:	<input checked="" type="checkbox"/> RSB EU RED (Extension Audit)	<input checked="" type="checkbox"/> RSB Global (Initial audit)
Please select boxes that apply:	<input type="checkbox"/> Pre-assessment <input checked="" type="checkbox"/> Initial Assessment (RSB Global) <input type="checkbox"/> Re-certification <input type="checkbox"/> Follow-Up to NCs <input checked="" type="checkbox"/> Scope extension (RSB EU RED) + Peanut Shell	<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:	First Collector of Rice Husk (RH) (initial audit) and Peanut Shell (PS – extension audit) Production of Torrefied Rice Husk Pellets from Rice Husk (initial audit) and peanut shell (extension audit)	
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:		
<i>Note: If the scope is different, please contact SCS.</i>		
Total workers covered by scope of certification:	313 when in full production	

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 Main office 1 Industrial Processor 25 Rice Husk First Collectors/ Traders with Storage (over 14 storage sites, some shared between traders) 60 Rice Mills (points of origin of rice husk) 533 peanut processors (PoO of peanut shells) -> reduced to 480 during the audit 86 peanut shell storage facilities
Participating Operator Risk Class	Low (5) adjusted to 3
Disputes or prior Non-compliances	Yes – see table of NCs from initial audit in section 4.14.

1.2.2 Standards Used

Applicable RSB-Accredited Standards

Standard Name and Version
• RSB Principles & Criteria (RSB-STD-01-001 V3.0)
• RSB Chain of Custody (RSB-STD-20-001 V3.2)
• RSB Standard for Participating Operators (RSB-STD-30-001 V3.3)
• RSB Procedure on Communication and Claims (RSB-PRO-50-001 V3.5)
• RSB Procedure for Risk Management (RSB-STD-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 EU RED Procedure for Traceability (Chain of Custody) (RSB-PRO-11-001-20-001 V3.7) (added in scope extension audit)
• RSB EU RED Standard for Advanced Fuels (RSB-STD-11-001-01-010 V2.1) (added in scope extension audit)
• RSB Standard for EU Market Access (RSB-STD-11-001 V4.0) (added in scope extension audit)

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	SSBE (Myanmar) Group Co Ltd
Type	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Vegetable oil Extraction <input checked="" type="checkbox"/> Biofuel Production and/or Distribution <input type="checkbox"/> Other, please explain here:
Location/City	Hlaing Thar Yar Township, Myanmar
Geographic location (<i>Latitude & Longitude</i>)	Land U/#22-71,Plot #494(B),Poelaung Village Tract, Myaung Mya Township, Myaung Mya District, Ayeyarwaddy Region, Myanmar
Start date of operations (initial start date)	Not yet officially started up
Number of processing steps	5 steps: Filter Crush Dry High and low temperature treatment Pelletization
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.	Torrefied Rice Husk and peanut shell Pellets
Annual throughput of previous 12 months	
Feedstock Input (Metric Ton)	0 – still under development phase
Final/Primary Product Output (Metric Ton)	0 – still under development phase
Intermediate/by-product Output (Metric Ton)	0 – still under development phase
% output yield compared to input material (total output/total input)	0 – still under development phase
Amount sold as RSB certified (tons)	0 – still under development phase

1.3.2 Points of Origin

Number of Points of Origin in Scope	60 (initial audit) 593 (extension audit – reduced to 540 during the audit)
Number of Points of Origin providing more than ten metric tons per months	60 (initial audit) 593 (extension audit)

Number of Points of Origin Assessed on a Sample Basis during This Audit	8 (initial audit) 25 (extension audit)
List of Points of Origin Assessed on a Sample Basis during This Audit	See confidential annex

1.3.3 Traders/First Collectors

Number of Traders in Scope	25 traders, 15 storage units (initial audit) 25 traders, 95 storage units (extension audit)
Number of Traders Assessed on a Sample Basis during This Audit	8 (and 4 warehouses) (initial audit) 5 (and 10 warehouses) (extension audit)
List of Points of Origin Assessed on a Sample Basis during This Audit	See confidential annex

1.4 GHG Intensity

Final Biofuel:	Torrefied rice husk pellets	GHG:	13.3g Co2 eq/ MJ
	Torrefied peanut shell pellets	GHG:	17.7g Co2 eq/ MJ

2.0 EVALUATION PLANNING & PROCESS

2.1 Audit Team (Initial audit)

Auditor Name:	Robert Earley	Auditor role:	Lead Auditor
Qualifications: Robert Earley is a certified RSB auditor and ISCC auditor since 2017 and has been based in Beijing, China since 2005. He studied at the Beijing International Studies University and received his Master's degree in environmental studies at the University of Waterloo, in 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. Robert is fluent in Mandarin Chinese.			
Auditor Name:	Khun Sann Kyaw	Auditor role:	Translator
Qualifications: Khun Sann Kyaw is a consultant and co-auditor of social compliance in Myanmar and Thailand. He has worked on community-based organization and auditing since 2009. Khun Sann has a Master's degree in Public Health from Curtin University (Perth), and a Bachelor of Arts in Sociology from Griffith University (Queensland, Australia). He is fluent in English, Thai, Burmese and Pa-O.			
Auditor Name:	Otavio Cavalett	Auditor role:	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.

Audit Team (EU RED Scope Extension Audit)

Auditor Name:	Miguel Ruiz	Auditor role:	Lead Auditor
Qualifications: 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.			
Auditor Name:	Khun Sann Kyaw	Auditor role:	Translator
Qualifications: Khun Sann Kyaw is a consultant and co-auditor of social compliance in Myanmar and Thailand. He has worked on community-based organization and auditing since 2009. Khun Sann has a Master’s degree in Public Health from Curtin University (Perth), and a Bachelor of Arts in Sociology from Griffith University (Queensland, Australia). He is fluent in English, Thai, Burmese and Pa-O.			
Auditor Name:	Otavio Cavalett	Auditor role:	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 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.

The audit was conducted remotely via video conference software and telephone where necessary, with an experienced auditor/translator on-site to make local observations and translations of documents written in Burmese.

2.2.3 Evaluation Itinerary and Activities (Initial audit – RSB Global)

Time	Element/Activity Stakeholder Interviews	Personnel Involved
Pre-audit and throughout the audit period as possible	<ul style="list-style-type: none"> – Stakeholder Interviews – Auditor to listen to independent assessment of prior and informed consent – Independent cross check of potential social (e.g status and impacts, land tenure, food security) and environmental issues (e.g. understanding of no-go areas, high biodiversity or special conservation areas addressed or not) – Check child labour and piece work payments 	<p>Local stakeholders</p> <p>Interviews will be conducted in Burmese by local expert and the auditor</p>

Time	Element/Activity	Personnel Involved
Day 1 11 October 2021	<p>Management Office and Industrial Site</p> <p>Microsoft Teams with on-site translator</p> <p>Auditor: Robert Earley Translator: Khun Sann Kyaw</p>	

<p>8:00 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 - 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. rice mills, traders, transportation, storage - Client to outline production process and overall process flow - Review site map(s) 	<p>All key staff related to RSB certification: Business management, facility management, supply chain management, community relations management.</p> <p>Translator *Meeting to be conducted primarily in Mandarin Chinese</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 - Review of Grievance Mechanism - Review of traceability method and implementation (including acquiring, handling, and forwarding sustainable material) - Analysis of material balances and records - Review of records - Review of GHG inputs - Communications and Claims 	<p>Company RSB Coordinator Supply Chain management</p>
<p>1:00</p>	<p>Lunch Break</p>	
<p>2:00</p>	<p>Employee Interviews</p> <ul style="list-style-type: none"> - Employees will be interviewed without management present. Please provide a room where interviews can be conducted. Interviews will be conducted in Burmese by the local expert and lead auditor. 	<p>4 workers Lead Auditor Local Expert (No management present)</p>
<p>3:00 p.m.</p>	<p>Document Review: Compliance with Principles and Criteria</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 screening tool - Review environmental and social management plan - Review impact assessments, if applicable - Review stakeholder engagement records <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 - Training and occupational health and safety record - Records for freedom of association mechanism <p>Principle 5:</p>	<p>Company RSB Coordinator Business management Environmental and Social Coordinator</p> <p>Local Expert Lead Auditor</p>

	<ul style="list-style-type: none"> - Social and economic development <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 <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: GMO, fertilizers, pesticides - 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 	
4:00 p.m.	<p>Site Walk-through – video presentation</p> <ul style="list-style-type: none"> - Observe operations at processing facility - Observe feedstock and product storage area - Observe chemical storage and disposal - Observe other critical control points 	Production, Warehouseman, and Post Production Personnel
4:45	<p>Report Writing</p> <ul style="list-style-type: none"> - Auditor(s) take time to consolidate notes and confirm audit findings 	
	End of Day 1	

Storage sites/Warehouses audited 12 October, 2021 – See list of Storage sites audited in Confidential annex

Time	Element/Activity	Personnel
<p>Days 2</p> <p>12 Oct, 2021</p>	<p>Storage Facility/Warehouse Audit Plan: Conducted with Lead Auditor using Microsoft Teams or Whatsapp</p> <p>Lead Auditor (Remote): Robert Earley Local Expert/Translator (on-site): Khun Sann Kyaw</p> <p>4 Warehouses (listed above) observed 12 October, 2021</p>	
8:00 a.m.	<p>Opening Meeting and General Requirements</p> <ul style="list-style-type: none"> - Review of assessment process to on-site staff - Confirm roles, responsibilities and processes and scope 	Management Warehouse Staff

8:30 a.m.	<p>Document Review: Participating Operator/ Standards Checklist</p> <ul style="list-style-type: none"> - Review of training procedures and records – focus on material balance and material handling - Review of contracts and records with rice husk providers and with SSGE - Review of traceability method and implementation (including acquiring, handling, and forwarding sustainable material, quarterly mass balance templates - Requirement for Advanced Fuels <p>Site Walk-through</p> <ul style="list-style-type: none"> - Observe storage area – local expert to observe with auditor on telephone. - Meters and other measurement instruments, data gathering and processing tools are adequate. Please provide photographs of measurement instruments to be confirmed during the audit. 	<p>Management Warehouse Staff</p> <p>Local expert Lead auditor (by phone)</p>
9:45 a.m.	<p>Findings</p> <ul style="list-style-type: none"> - Presentation of all non-compliances and opportunities for improvement 	<p>Management Warehouse Staff</p>
End of Warehouse audit		

Point of Origin Audits: See list of Points of Origin audited in Confidential Annex

Point of Origin audit template (2.5 hours per Point of Origin):

Time	Element/Activity	Personnel
<p><i>Day 3, 4,5</i> 13-15 Oct, 2021</p>	<p>Point(s) or Origin: 4 points of origin per day for a total of 8 Points of origin.</p> <p>Conducted with Lead Auditor using Microsoft Teams or Whatsapp</p> <p>Lead Auditor (Remote): Robert Earley Local Expert/Translator (on-site): Khun Sann Kyaw</p> <p>8 Points of Origin observed 13-15, 2021</p>	
8:00 a.m.	<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>Document Review: Participating Operator/ Standards Checklist</p> <ul style="list-style-type: none"> - Review of eligibility of material - Review of process flows and feasibility of production - Review of declarations of outgoing material - Review of feedstock specific requirements, if applicable <p>Site Walk-through</p> <ul style="list-style-type: none"> - Observe processing area 	<p>Point of Origin staff Local audit expert Lead auditor (remote)</p>
10:30	Findings	Auditor

	– Presentation of all non-compliances and opportunities for improvement	
	End of Point of Origin Audit	

Rice Husk Trader Audits (15 October, 2021): See confidential annex

First Collector/Trader Audit template:

Time	Element/Activity	Personnel Involved
<i>Day 5</i> October 15, 2021	Rice Husk Traders Conducted with Lead Auditor using Microsoft Teams or Whatsapp Lead Auditor (Remote): Robert Earley Local Expert/Translator (at SSBE Office): Khun Sann Kyaw 5 Traders audited 15 October, 2021: – All traders audited at SSBE Office, Pathein	
8:00 a.m.	Opening Meeting and General Requirements <ul style="list-style-type: none"> – Review of assessment process to on-site staff – Confirm roles, responsibilities and processes – Confirmation of scope of products to be certified 	Trader staff
8:30	Document Review: Participating Operator/ Standards Checklist <ul style="list-style-type: none"> – Review of training procedures and records – focus on material balance and material handling – Review of contracts with Points of Origin and warehouses and records such as receipts to Points of Origin and delivery notes – Review of traceability method and implementation (including acquiring, handling, and forwarding sustainable material – Analysis of material balances and records - observation of the quarterly mass balance reporting system – please provide photographs of template documents in advance of the audit. – Requirement for Advanced Fuels 	Trader staff
10:30	Site Walk-through (If necessary) <ul style="list-style-type: none"> – Observe storage area – local expert to observe with auditor on telephone. – Meters and other measurement instruments, data gathering and processing tools are adequate. Please provide photographs of measurement instruments to be confirmed during the audit. 	Trader staff
11:15	Report Writing <ul style="list-style-type: none"> – Auditor(s) take time to consolidate notes and confirm audit findings 	Auditor
11:45	Findings <ul style="list-style-type: none"> – Presentation of all non-compliances and opportunities for improvement 	Management Warehouse Staff

	End of Trader audit	
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Time	Element/Activity	Personnel Involved
Day 6 October 18, 2021	Closing meeting Management Office and Industrial Site Microsoft Teams with on-site translator Auditor: Robert Earley Translator: Khun Sann Kyaw	
11:00 a.m.	Closing meeting <ul style="list-style-type: none"> - Presentation of general audit findings - Presentation of all non-compliances and opportunities for improvement - Review of closing meeting record - Establish timetables for signed closing meeting record, corrective action and submission of Correction Action Plan - Overview of timetable for audit report completion - Reiterate SCS appeal and grievance policy - Questions 	
	End of Audit	

Scope Extension Audit (RSB EU RED)

Time	Day 2: Opening meeting (Auditor team arrives to Yangon on Day 1)	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 2 August 8, 2022	Meeting Room at SSGE office	
5:00 p.m. Myanmar time	Opening Meeting and General Requirements <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff; confidentiality; safety procedures; method of reporting and NC grading, etc. - Review of scheduled activities -> itinerary - Confirmation of scope of products to be certified - Review of RSB procedures; confirm roles, responsibilities and processes - Review of Risk Assessment Tool - Relevant updates from client and any social or environmental changes to the operation - Follow-up on implementation of any corrective action plans from desk audit or previous initial field audit. 	Management

Time	Day 3 - Industrial operator and main office	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 3 August 9, 2022	SSGE Bioenergy Company Limited – Myanmar (Industrial operator and main office). Land U/#22-71, Plot #494(B), Poelaung Village Tract, Myaung Mya Township, Myaung Mya District, Ayeyarwaddy Region, Myanmar On-site	1h from Patheiny by car
10:30 a.m.	Short opening Meeting <ul style="list-style-type: none"> - Client to outline production process and overall process flow - Review of site map(s) - Confirmation of scope of products in scope - Review of scheduled activities: Identify 3 labour employees to interview Relevant updates from client and any social or environmental changes to the operation	Management
10:45 a.m.	Document Review: Participating Operator/Standards Checklist <ul style="list-style-type: none"> - Review updated training procedures and records - Review of grievance mechanism and records - Review of traceability method and implementation (including acquiring, handling and forwarding of sustainable material); meter calibration records - Analysis of material balances and records, mass balances for Global and EU RED materials - Review of records - Review of GHG inputs - Communications and claims Requirements for Advanced Fuels	Management
11:00 a.m.	Site walk-through <ul style="list-style-type: none"> - Observe operations at processing facility - Observe control room - Observe ponds/tanks/reservoir(s) - Observe feedstock and product storage area - Observe chemical storage and disposal - Observe sludge repository or disposal Observe other critical control points	Production, Warehouseman, and Post- Production Personnel
1:00 p.m.	Lunch Break Please prepare a simple meal on-site or nearby to maintain audit schedule	
2:00 p.m.	Arrange meetings with 3 labour employees in a meeting room without the presence of management *Update Principle 4	
2:30 p.m.	Review of compliance with Principles and Criteria Ensure that risks identified in the Risk assessment tool and screening tool are directly addressed <ul style="list-style-type: none"> - Review of updates in ESMP 	Management and relevant operator staff
3:00 p.m.	WH #1: Nyaung Chaung Lay <ul style="list-style-type: none"> - Review of training procedures and records; list of staff handling RSB material 	

	<ul style="list-style-type: none"> - Review of contracts and records for material handling - Review of traceability methods/procedures and implementation (including acquiring, handling and forwarding sustainable material) - Analysis of material balances and transaction records; meter calibration records - Requirements for Advanced Fuels/Advanced Products - Site walk-through 	
4:30 p.m.	Report writing Auditor(s) take time to consolidate notes and confirm audit findings and prepare the closing meeting record	
5:00 p.m.	Review of day's findings	
Time	Day 4 – WH and Rice Mills in Pathein region	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 4 August 10, 2022	WH and Rice mills in Pathein region	
9:00 a.m.	WH #2 – A Nauk Su <ul style="list-style-type: none"> - Review of training procedures and records; list of staff handling RSB material - Review of contracts and records for material handling - Review of traceability methods/procedures and implementation (including acquiring, handling and forwarding sustainable material) - Analysis of material balances and transaction records; meter calibration records - Requirements for Advanced Fuels/Advanced Products - Site walk-through 	Management Warehouse staff
1:00 p.m.	Rice mill #1 – Thu Kha Shwe <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management
3:30 pm	Rice mill #2 – Ayar Htook Khaung <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management
5:30 pm	Report writing Auditor(s) take time to consolidate notes and confirm audit findings	Auditor
5:40 pm	Findings	

	Presentation of all non-compliances and opportunities for improvement	
Time	Day 5 – Rice Mills in Pathein region	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 5 August 11, 2022	Rice mills in Pathein region	
9:00 a.m.	Rice Mill #3 – Shwe War Win <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management
1:00 p.m.	Rice mill #4 – Mann Gyi Gyi <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management
3:30 pm	Rice mill #5 – U Kyin Tin <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management
5:30 pm	Report writing Auditor(s) take time to consolidate notes and confirm audit findings	Auditor
5:40 pm	Findings Presentation of all non-compliances and opportunities for improvement	
Time	Day 6 – traders in Pathein region	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 6 August 12, 2022	Traders in Pathein region	
9:00 a.m.	Trader #1 – Harmony Sunlight <ul style="list-style-type: none"> - Introductory meeting, scope, WH managed by the trader - Review of contracts, training procedures and records 	Point of Origin Management

	<ul style="list-style-type: none"> - Review of traceability method and implementation (including acquiring, handling and forwarding of sustainable material); meter calibration records - Analysis of quarterly mass balance of materials collected - Review of transaction records - Site walk-through 	
1:00 p.m.	Trader #2 – Dream Skyline <ul style="list-style-type: none"> - Introductory meeting, scope, WH managed by the trader - Review of contracts, training procedures and records - Review of traceability method and implementation (including acquiring, handling and forwarding of sustainable material); meter calibration records - Analysis of quarterly mass balance of materials collected - Review of transaction records - Site walk-through 	Point of Origin Management
3:30 pm	Trader #3 – BS Garden <ul style="list-style-type: none"> - Introductory meeting, scope, WH managed by the trader - Review of contracts, training procedures and records - Review of traceability method and implementation (including acquiring, handling and forwarding of sustainable material); meter calibration records - Analysis of quarterly mass balance of materials collected - Review of transaction records - Site walk-through 	Point of Origin Management
5:30 pm	Report writing Auditor(s) take time to consolidate notes and confirm audit findings	Auditor
5:40 pm	Findings Presentation of all non-compliances and opportunities for improvement	
Time	Day 7 – traders in Pathein region	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 7 August 13, 2022	Traders in Pathein region	
9:00 a.m.	Trader #4 – Glory Light <ul style="list-style-type: none"> - Introductory meeting, scope, WH managed by the trader - Review of contracts, training procedures and records - Review of traceability method and implementation (including acquiring, handling and forwarding of sustainable material); meter calibration records - Analysis of quarterly mass balance of materials collected - Review of transaction records - Site walk-through 	Point of Origin Management
1:00 p.m.	Trader #5 – Heyday Journey <ul style="list-style-type: none"> - Introductory meeting, scope, WH managed by the trader - Review of contracts, training procedures and records 	Point of Origin Management

	<ul style="list-style-type: none"> - Review of traceability method and implementation (including acquiring, handling and forwarding of sustainable material); meter calibration records - Analysis of quarterly mass balance of materials collected - Review of transaction records - Site walk-through 	
5:30 pm	Report writing Auditor(s) take time to consolidate notes and confirm audit findings	Auditor
5:40 pm	Findings Presentation of all non-compliances and opportunities for improvement	
Time	Day 8 - Travel from Pathein to Magway	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 8 August 14, 2022	In transit	
	Check into hotel, prepare for day 9	
Time	Day 9 – PoOs in Magway region	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 8 August 15, 2022	PoOs in Magway region	
8:00 a.m.	PS factory #1: U Pay Thaug (n°285) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
10:30 a.m.	PS factory #2: U Tin Own (n°242) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
2:00 pm	PS factory #3: U Htay Win Aung (n°232) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) 	Point of Origin Management, staff

	<ul style="list-style-type: none"> - Review of declarations of outgoing material - Site walk-through 	
4:30 pm	<p>PS factory #4: U Aung Shwe Than (n°268)</p> <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
5:30 pm	<p>Report Writing Auditor(s) take time to consolidate notes and confirm audit findings</p>	
5:40 pm	<p>Findings Presentation of all non-compliances and opportunities for improvement</p>	
Time	Day 10 – PoOs in Magway region	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 10 August 16, 2022	PoOs in Magway region	
8:00 a.m.	<p>PS factory #5: U Tin Saun (n°254)</p> <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
10:30 a.m.	<p>PS factory #6: U San Shwe (n°257)</p> <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
2:00 pm	<p>PS factory #7: U Kyaw Myo Naing (n°251)</p> <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff

4:30 pm	PS factory #8: U Hla Win Soe (n°256) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
5:30 pm	Report Writing Auditor(s) take time to consolidate notes and confirm audit findings	
5:40 pm	Findings Presentation of all non-compliances and opportunities for improvement	
Time	Day 11 – PoOs in Magway region	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 11 August 17, 2022	PoOs in Magway region	
8:00 a.m.	PS factory #9: U Aung Myo Win (n°250) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
10:30 a.m.	PS factory #10: U Nyi Soe (n°332) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
2:00 pm	PS factory #11: U Aung Toe (n°336) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
4:30 pm	PS factory #12: U Kan Win (n°377) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material 	Point of Origin Management, staff

	<ul style="list-style-type: none"> - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	
5:30 pm	Report Writing Auditor(s) take time to consolidate notes and confirm audit findings	
5:40 pm	Findings Presentation of all non-compliances and opportunities for improvement	
Time	Day 12 – PoOs in Magway region	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 12 August 18, 2022	PoOs in Magway region	
8:00 a.m.	PS factory #13: Daw Khaing Zhaing Kyi (n°327) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
10:30 a.m.	PS factory #14: U Phone Kyaw Zaw (n°299) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
2:00 pm	PS factory #15: U Zaw Myo Htet (n°328) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
4:30 pm	PS factory #16: U Phyo Ko (n°346) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material 	Point of Origin Management, staff

	- Site walk-through	
5:30 pm	Report Writing Auditor(s) take time to consolidate notes and confirm audit findings	
5:40 pm	Findings Presentation of all non-compliances and opportunities for improvement	
Time	Day 13 – PoOs in Magway region	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 13 August 19, 2022	PoOs in Magway region	
8:00 a.m.	PS factory #17: A Aung San Min (n°347) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
10:30 a.m.	PS factory #18: U Zaw Gyi (n°361) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
2:00 pm	PS factory #19: A Aung San Win (n°302) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
4:30 pm	PS factory #20: Daw Pyone (n°216) <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff, confirm roles, responsibilities and processes - Review eligibility of material - Review process flows and feasibility of production volumes (including mass balance) - Review of declarations of outgoing material - Site walk-through 	Point of Origin Management, staff
5:30 pm	Report Writing Auditor(s) take time to consolidate notes and confirm audit findings	

5:40 pm	Findings Presentation of all non-compliances and opportunities for improvement	
Time	Day 14 – PoOs in Magway region	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 14 August 20, 2022	PoOs in Magway region	
8:00 a.m.	WH #1 – Nan Kat Kyun (WH-018) <ul style="list-style-type: none"> – Review of training procedures and records; list of staff handling RSB material – Review of contracts and records for material handling – Review of traceability methods/procedures and implementation (including acquiring, handling and forwarding sustainable material) – Analysis of material balances and transaction records; meter calibration records – Requirements for Advanced Fuels/Advanced Products – Site walk-through 	Management Warehouse staff
10:30 a.m.	WH #2 – Chan Myae Thar Yar (WH-019) <ul style="list-style-type: none"> – Review of training procedures and records; list of staff handling RSB material – Review of contracts and records for material handling – Review of traceability methods/procedures and implementation (including acquiring, handling and forwarding sustainable material) – Analysis of material balances and transaction records; meter calibration records – Requirements for Advanced Fuels/Advanced Products – Site walk-through 	Management Warehouse staff
2:00 pm	WH #3 – Hpa Yar Pyo (WH-037) <ul style="list-style-type: none"> – Review of training procedures and records; list of staff handling RSB material – Review of contracts and records for material handling – Review of traceability methods/procedures and implementation (including acquiring, handling and forwarding sustainable material) – Analysis of material balances and transaction records; meter calibration records – Requirements for Advanced Fuels/Advanced Products – Site walk-through 	Management Warehouse staff
4:30 pm	WH #4 – Gway Tout San (WH-036) <ul style="list-style-type: none"> – Review of training procedures and records; list of staff handling RSB material – Review of contracts and records for material handling – Review of traceability methods/procedures and implementation (including acquiring, handling and forwarding sustainable material) – Analysis of material balances and transaction records; meter calibration records 	Management Warehouse staff

	<ul style="list-style-type: none"> - Requirements for Advanced Fuels/Advanced Products - Site walk-through 	
5:30 pm	Report Writing Auditor(s) take time to consolidate notes and confirm audit findings	
5:40 pm	Findings Presentation of all non-compliances and opportunities for improvement	
Time	Day 15 – PoOs in Magway region	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 15 August 21, 2022	PoOs in Magway region	
8:00 a.m.	WH #5 – Then Taw Kone (WH-036) <ul style="list-style-type: none"> - Review of training procedures and records; list of staff handling RSB material - Review of contracts and records for material handling - Review of traceability methods/procedures and implementation (including acquiring, handling and forwarding sustainable material) - Analysis of material balances and transaction records; meter calibration records - Requirements for Advanced Fuels/Advanced Products - Site walk-through 	Management Warehouse staff
10:30 a.m.	WH #6 – Magyi Kan (WH-038) <ul style="list-style-type: none"> - Review of training procedures and records; list of staff handling RSB material - Review of contracts and records for material handling - Review of traceability methods/procedures and implementation (including acquiring, handling and forwarding sustainable material) - Analysis of material balances and transaction records; meter calibration records - Requirements for Advanced Fuels/Advanced Products - Site walk-through 	Management Warehouse staff
2:00 pm	WH #7 – Pu Htoe San (WH-031) <ul style="list-style-type: none"> - Review of training procedures and records; list of staff handling RSB material - Review of contracts and records for material handling - Review of traceability methods/procedures and implementation (including acquiring, handling and forwarding sustainable material) - Analysis of material balances and transaction records; meter calibration records - Requirements for Advanced Fuels/Advanced Products - Site walk-through 	Management Warehouse staff
4:30 pm	WH #8 – Hlaung Taw Oo (Hpote Kone) (WH-028) <ul style="list-style-type: none"> - Review of training procedures and records; list of staff handling RSB material 	Management Warehouse staff

	<ul style="list-style-type: none"> - Review of contracts and records for material handling - Review of traceability methods/procedures and implementation (including acquiring, handling and forwarding sustainable material) - Analysis of material balances and transaction records; meter calibration records - Requirements for Advanced Fuels/Advanced Products - Site walk-through 	
5:30 pm	Report Writing Auditor(s) take time to consolidate notes and confirm audit findings	
5:40 pm	Findings Presentation of all non-compliances and opportunities for improvement	

Time	Closing meeting – Can be remote if necessary	Personnel Involved
Auditor(s) names: Miguel Ruiz (Auditor), Khun Sann (translator)		
Day 25 August, 2022	Remote - online	
11:00 AM	Closing meeting <ul style="list-style-type: none"> - Presentation of general audit findings - Presentation of all non-compliances and opportunities for improvement - Review of closing meeting record - Establish timetables for signed closing meeting record, corrective action and submission of Correction Action Plan - Overview of timetable for audit report completion - Reiterate SCS appeal and grievance policy - Questions 	
	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.

2.3.2 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?	No claims made to date or planned
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 claims made to date or planned
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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) – Initial audit (RSB Global, remote audit because COVID). Completed with comments of the interviews and auditor observation made during the scope expansion audit (RSB EU RED, on-site visit).

Stakeholder Comments	SCS Response
Economic Concerns	
Stakeholders strongly supported the project from the economic perspective	
Social Concerns	
Traffic was raised as a potential social concern, but other stakeholders noted that the company does coordinate construction traffic with the community	Issue seems to be addressed in interaction with community. Operator has improved the road through the nearest village to accommodate traffic and coordinates construction vehicles with community when necessary.
Community members highly supportive of health, school and road improvement projects	
Interviews with 3 workers of the plant indicated good labor conditions and payments.	
Environmental Concerns	

Environmental issues were not raised by any stakeholders	
On-site visit of the plant did not reveal any environmental issue	

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
SSBE (Myanmar) Co. Ltd.	6 (original) 9 (after adjustment)	Low	6 Oct 2021 (initial audit)	Disagree – adjusted to 9
SSBE (Myanmar) Co. Ltd.	5 (original) 3 (after adjustment)	Low	28 July 2022 (RSB EU RED Scope extensión)	agree
Overall Risk				Low

If risk assessment deviates (Initial audit):

Site	Risk Assessment #	Risk Assessment Topic	PO's assessment	Auditor's assessment and explanation
SSBE (Myanmar) Co. Ltd.	C.1	Scope of certification includes suppliers	PO answered "No, certification does not include suppliers"	First collectors are in scope, these are suppliers and are therefore certification does include suppliers.

If risk assessment deviates (EU RED Scope Extension audit):

Site	Risk Assessment #	Risk Assessment Topic	PO's assessment	Auditor's assessment and explanation
SSBE (Myanmar) Co. Ltd.	D.1	Governance performance	2 of 3 indicator values were not properly calculated	Indicator value was corrected and D.1.b section completed.

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 (Initial audit and RSB EU RED extension audit)

<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 (Initial Audit – RSB Global)

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	Standards checklist 6.3.1	<p>Sein Mitter Rice mill delivery notes do not include statement that the material is eligible for Waste and Residue under RSB (e.g. Sein Mitter Rice mill delivery note, applicable to all traders/PoOs sampled)</p> <p>RCA submitted 18 Nov 2021</p> <p>Evidence submitted: Delivery Note Template (Trader) updated with note "Eligible raw material complies with RSB Global Waste/Residue Standard".</p>	Closed 17 Oct 2021:
2021-2	Major	Standards checklist 1.8, 12.5.2, 12.5.4	<p>Trader contract does not include reference to provide required data for RSB CoC, nor to allow access to all aspects of certification scope. (e.g. Grand Prospect contract with SSBE. All entities in scope use the same management manual)</p> <p>RCA submitted 18 Nov 2021</p> <p>Evidence submitted:</p>	Closed 17 October, 2021.

			Updated contract template supplied indicating that data will be supplied and sites will be accessible to auditors.	
2021-3	Major	Standards checklist 6.3.1	<p>Trader template for delivery note does not include reference that material is eligible as waste or residue. (e.g. Grand Prospect trader delivery note to SSBE)</p> <p>RCA submitted 18 Nov 2021</p> <p>Evidence submitted: Delivery note Template (Trader) updated with note "Eligible raw material complies with RSB Global Waste/Residue Standard".</p>	Closed 17 October, 2021.
2021-4	Major	Standards Checklist 6.3.1	<p>Country of Origin not included on delivery note template (Central Unit example, applicable to all traders sampled)</p> <p>RCA submitted 18 Nov 2021</p> <p>Evidence submitted: Delivery note updated 11/18/21 to reflect country of origin (Myanmar)</p>	Closed 18 November, 2021.
2021-5	Obs	Principle 5 Indicator a.4	<p>Operator is reminded about requirement to measure improvements in social and economic indicators set against the baseline in the ESMP every 3 years</p> <p>RCA submitted 18 Nov 2021</p> <p>Evidence submitted: ESMP Update 28.10.21 Section 8.2 updated to note that comparison against baseline should be prepared every three years.</p>	Closed 29 October, 2021.
2021-6	Major	Principle 5 Indicator b.1	<p>Although baseline summary research indicates a majority of Kayin people (a minority in Myanmar) in the Po Long village tract, there is no special measure that benefits or encourages participation in the project.</p> <p>RCA submitted 18 Nov 2021</p> <p>Closed 29 October, 2021: Evidence:</p>	Closed

			<p>ESMP Update 28.10.21.pdf indicates that a policy is in place to actively encourage the hiring of ethnic minorities in the local region, as well as promoting the benefits of improved infrastructure and improved indirect economic opportunities to ethnic minorities/indigenous people in the area.</p> <p>Progress to be checked next audit</p>	
2021-7	Obs.	Principle 11.a.1	<p>Patent is currently under review and is not available to the public. To be checked in future audits.</p>	Open
2021-8	Minor	Principle 11.e.1	<p>Residential waste produced on-site does not have a waste and by-product management plan in place. This is a small volume of waste but should be addressed.</p> <p>RCA submitted 18 Nov 2021</p> <p>Evidence submitted: ESMP Update 28.10.21.pdf includes information about the recycling of recyclable wastes such as paper, glass and metal. Food scraps are sold or delivered to local farmers for organic fertilizer. Remaining waste will be disposed by the Myaung Mya City Development Committee once every two days.</p>	Closed 29 October, 2021:
2021-9	Major	RSB-PRO-20-001 Checklist 6.2.2, 8.3.10	<p>Mass balance template does not calculate mass balance on dry material basis and does not include a method for ensuring no deficit can occur on a quarterly basis.</p> <p>RCA submitted 18 Nov 2021</p> <p>Evidence submitted: Mass balance template submitted including moisture levels for each transaction as well as a deficit column that shall be resolved to 0 at each quarter. "SSBE Mass Balance Quarterly Inventory Record.pdf"</p>	Closed 17 October, 2021

2021-10	Major	RSB-PRO-20-001 Annex (Checklist 6.3.3, 6.3.4)	<p>Outgoing material Proof of Sustainability does not contain required information to pass to client, also does not contain required GHG information.</p> <p>RCA submitted 18 Nov 2021 Evidence submitted: "SSBE Delivery Note (Outgoing material)" Contains all required information from the standard</p>	Closed 18 November 2021.
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Non-compliances and Current Status (RSB EU RED Scope extension audit)

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	Major-NC	<p>F.1.3.1 and F.1.3.2 of RSB-PRO-30-001</p> <p>Requirement 1.5 of the EU RED checklist (PU) and general info. tab in trader checklist</p>	<p>The information was not included in ESMP, quality manual or PS and RM lists:</p> <ul style="list-style-type: none"> -applicable chain of custody model, -geographic coordinates of traders in PS and RM list, <p>RCA Provided</p> <p>Closure evidence (21 Sept 2022): Mass balance CoC system noted in updated ESMP P.4-12. Trader locations have been updated in documented spreadsheets</p>	Closed
2022-2	Major-NC	<p>F.1.3.4 of RSB-PRO-30-001</p> <p>Requirement 1.6 of the EU RED checklist (processing unit)</p>	<p>New material added to the scope, Peanut shell (PS), is not included in the process description of the ESMP.</p> <p>RCA Provided</p>	Closed

			Closure evidence (21 Sept 2022): Peanut shell process description observed in updated ESMP document.	
2022-3	Major-NC	F.1.4 of RSB-PRO-30-001 Requirement 1.8 of the EU RED checklist (processing unit)	Contractual agreements between the traders and PoOs do not include reference to the unrestricted access and the data management aspects of the contract. RCA Provided Closure evidence (21 Sept 2022): Template documents observed with required language implemented	Closed
2022-4	Minor-NC	F.2.8 of RSB-PRO-30-001 Requirement 1.10 of the EU RED checklist (processing unit)	Operator conducted the self-evaluation prior to the audit but with not enough time to allow the auditor to review the document in detail. self-evaluation shall be completed and forward to the auditor in time prior to the audit for review. RCA Provided	open
2022-5	Major-NC	F.4.2 of RSB-PRO-60-001 Requirement 3.8 of the EU RED checklist (processing unit)	RSB related risks associated with the political stability of the country were not included in the risk management plan. RCA Provided Closure evidence (Sept 21, 2022). Updated SSBE Risk Management Matric (20220902) includes relevant risk, evaluation, and plan.	Closed
2022-6	Minor-NC	F.3.1 and annex I of RSB-PRO-11-001-20-001 Requirement 6.4.2 of the EU RED checklist (processing unit)	Although the value of the conversion factor indicated by the operator match the typical values obtained from torrefaction, the value could not be verified against production records for any of the two raw materials in scope: RH and PS. to be verified in the next audit. RCA Provided	open
2022-7	Major-NC	Annex I of RSB-PRO-11-001-20-001	Outgoing product related documentation is missing:	Closed

		Requirement 6.4.3 of the EU RED checklist (processing unit)	<p>-statement that the material is included in the Annex IX of Directive 2018/2001/EU.</p> <p>-the statement that compliance with the sustainability criteria according to Article 29 (3) to (7) of Directive (EU) 2018/2001 was not audited and not certified.</p> <p>RCA Provided</p> <p>Closure evidence (November 17, 2022): A Proof of sustainability for EU RED template was provided with the appropriate language displayed</p>	
2022-8	Major-NC	<p>Annex I of RSB-PRO-11-001-001-010</p> <p>Requirement 24.5 of the EU RED checklist. (Also requirements 22 (1 to 3), 19 (1 to 3), 18 (1 to 9), 16 (1 to 5), 15.1, 15.2, 8.3.15 and 8.3.5 (processing unit)</p>	<p>The GHG data and calculation model were not available and could not be reviewed.</p> <p>RCA Provided</p> <p>Closure Evidence (21 Sept, 2022): GHG calculations and methodology were submitted 21 September 2022 and verified through a meeting with auditors. The material was found to be compliant against all relevant indicators and requirements. All relevant transport steps were found to be taken into account, and actual values were found to be complete and accurate.</p>	Closed
2022-9	Major-NC	<p>F.3.3.2 of RSB-PRO-11-001-20-001</p> <p>Requirement 8.2.2 of trader checklist</p>	<p>Deliveries notes between PoOs and trader in the Peanut Shells supply chain do not include a document number. Each delivery note must include a unique document number.</p> <p>RCA submitted</p> <p>Closure evidence (21 Sept, 2022): Training record from August 26, 2022 was submitted including traders. Record notes DN requirement</p> <p>A delivery note with numbering system implemented was provided as evidence of implementation</p>	Closed

2022-10	Major-NC (Added in Technical review)	Annex I of RSB-PRO-11-001-20-001 and requirement 2.5.2 of RSB-PRO-50-001 Requirement 6.4.1, 6.4.3 and 9.2 of trader checklist	Incoming/outgoing product documentation do not include the RSB short claim "Product mix contains RSB certified material" applicable under the mass balance chain of custody option. RCA Submitted Closure evidence (10 November, 2022): PoS with statement, "RSB EU RED Compliant Biomass" was accepted. E-mail from RSB indicates acceptance.	Closed
2021-7	Obs.	Principle 11.a.1	Patent is currently under review and is not available to the public. To be checked in future audits.	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 4.1.4.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
For the RSB EU RED Scope and peanut shell material extension audit: Operator to be awarded certification under the RSB EU RED scope subject to the minor non-compliances stated in section 4.1.4	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 during the initial audit:	On-site implementation of safety and hygiene practices were difficult to evaluate from a remote meeting due to limitations of remote meetings and data signal availability at the site. These should be checked during an on-site audit. The pellet factory was not complete or in production

		at the time of audit, so actual implementation should be examined at the next audit.
	Comments and/or details of any issue which was difficult and/or impossible to evaluate during the RSB EU RED Scope extension and peanut shell material audit:	The pellet factory was not at full commercial production at the time of audit, so actual implementation should be examined at the next audit.
To be completed by Certification Decision-Making Entity	Technical Review by: If different to decision-maker	Initial audit: Inna Kitaychik RSB EU RED and peanut shell material scope extension Audit: Robert Earley
	Certification decision:	Initial audit: Certification against the standards listed in Section 1.2.2 to the RSB Global scheme RSB EU RED and peanut shell material Scope extension Audit: Certification against the standards listed in Section 1.2.2 to the RSB EU RED scheme
	Certification decision by:	Initial audit: Inna Kitaychik RSB EU RED Scope extension Audit: Robert Earley
	Date of decision: For initial or continued certification	Initial RSB Global audit: December 3, 2021 RSB EU RED and peanut shell material scope extension: November 17, 2022
	Surveillance schedule:	The 1 st surveillance audit for the RSB Global scope must take place by 24 November, 2022. RSB EU RED additional surveillance must take place within 6 months of 17 November 2022 RSB EU RED surveillance audit must take place by 16 November, 2023. Notes: As the initial RSB Global audit was conducted remotely under RG-2020-02 V2.3 Paragraph 3.1, the 1 st surveillance audit must be conducted on-site