

# Certification Evaluation Report

*Roundtable on Sustainable Biomaterials*

*Global/Advanced Products*

*Ineos Europe AG - Ineos Nitriles*

## **SCS Certificate Code: SCS-RSB/PC-01360**

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[www.ineos.com/businesses/ineos-nitriles](http://www.ineos.com/businesses/ineos-nitriles)

CERTIFIED	EXPIRATION
20 December 2021	19 December 2026

DATE(S) OF CERTIFICATION AUDIT (KÖLN)

22<sup>nd</sup>-23<sup>rd</sup> September 2021

DATE OF SCOPE EXTENSION AUDIT (GREEN LAKE)

23-24 May, 2022

DATE OF LAST UPDATE

12 September, 2022

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## FOREWORD

SCS Global Services (SCS) is a certification body accredited by the Roundtable on Sustainable Biomaterials (RSB) to conduct evaluations of biofuel operators (CB Registration No. 592). Under the RSB/SCS certification system, participating operators meeting international standards of biofuel production can be certified as “sustainable,” thereby permitting the Operator’s use of the RSB endorsement and logo in the marketplace subject to regular RSB/SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts all over the world to conduct evaluations of biofuel operations. SCS evaluation teams collect and analyze written materials, conduct interviews with Participating Operator’s staff and key stakeholders, and complete field and office audits of the operation(s) identified in the certification scope. Upon completion of the fact-finding phase of all evaluations, SCS teams determine compliance to the RSB Principles and Criteria.

Please Note: An RSB certificate itself does not constitute evidence that a particular product supplied by the certificate holder is certified to RSB standards. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required RSB claim is clearly stated on-product. For more information about the RSB, visit their website at [www.rsb.org](http://www.rsb.org).

### Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Roundtable on Sustainable Biomaterials. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs, and policies applied to the Participating Operator, and the results of the evaluation. Section A will be posted on the RSB Participating Operators Database (<http://rsb.org/certification/participating-operators/>). Section B contains more detailed results and information for use by the Participating Operator.

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## SECTION A – PUBLIC SUMMARY

### 1.0 GENERAL INFORMATION

#### 1.1 Operator Information

##### 1.1.1 Name and Contact Information

Organization name	Ineos Europe AG - Ineos Nitriles		
Operator Number	2201		
Contact person	Alice Dibben		
Address	Avenue des Uttins 3, 1180 Rolle, Switzerland	Telephone	+44 (0) 7786 026996
		Fax	//
		e-mail	alice.dibben@ineos.com
		Website	<a href="http://www.ineos.com">www.ineos.com</a>

#### 1.2 Scope of Certificate

Please select one:	<input type="checkbox"/> RSB EU RED	<input checked="" type="checkbox"/> RSB Global
	<input type="checkbox"/> RSB CORSIA	<input type="checkbox"/> RSB Japan Fit
Please select boxes that apply:	<input type="checkbox"/> Pre-assessment	<input type="checkbox"/> 1st Annual Surveillance
	<input checked="" type="checkbox"/> Initial Assessment	<input type="checkbox"/> 2nd Annual Surveillance
	<input type="checkbox"/> Re-certification	<input type="checkbox"/> 3rd Annual Surveillance
	<input type="checkbox"/> Follow-Up to NCs	<input type="checkbox"/> 4th Annual Surveillance
Scope Extension audit type:	Initial assessment, industrial operator (Green Lake)	
Scope as it appears on certificate:	<p>Certificate holder/main office, Industrial Processor, limited risk distributors.                      Input: propylene (bio-attributed)                      Output: Acrylonitrile (claim on bio-attributed propylene)</p> <p>Scope Extension:                      Certificate holder/main office, Industrial Operator (Köln), Industrial Operator (Green Lake), 6 external storage facilities, trading offices                      Input: Propylene (bio-attributed)                      Output: Acrylonitrile (claim on bio-attributed propylene)</p>	

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:	Ammonia was not part of the scope as input. Acetonitrile was not part of the scope as output, All warehouses were taken out of the scope, Limited risk distributors (flash traders) not reflected in the initial scope but added in the audit.	

### 1.2.1 Determination of Extent of Audit

#### Initial Köln Industrial Operator 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 central office (certificate holder) 1 industrial processor 4 limited risk distributors
Participating Operator Risk Class	Low (0)
Disputes or prior Non-compliances	Main audit

#### Initial Green Lake Industrial Operator Audit (Scope Extension Audit 2022)

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 industrial operator (Acrylonitrile production) 6 external storage locations (3 audited on a sample basis)
Participating Operator Risk Class	Low (3)
Disputes or prior Non-compliances	N/A Initial audit

### 1.2.2 Determination of Participating Operator Risk Class

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
Nitriles unit (Köln)	0	Low	9/16/21	Agrees with assessment
Nitriles unit (Green Lake) (Scope extension)	3	Low	5/22/22	Agrees with Assessment
Overall Risk	3			Low

### 1.2.3 RSB Audit type 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

### 1.2.4 Standards Used

#### Applicable RSB-Accredited Standards

Standard Name and Version
• RSB Principles & Criteria (RSB-STD-01-001 V3.0);
• RSB Chain of Custody (RSB-PRO-20-001 V3.2);
• RSB Standard for Participating Operators (RSB-PRO-30-001 V3.3);
• RSB Procedure on Communication and Claims (RSB-PRO-50-001 V3.5);
• RSB Risk Management (RSB-PRO-60-001 V3.3);
• RSB Standard for Advanced Products RSB-STD-02-001 V 2.0);
• RSB GHG Calculation Methodology (RSB-STD-01-003-01 V2.3);

All standards employed are available on the websites of the Roundtable on Sustainable Biomaterials (<https://rsb.org/the-rsb-standard/working-with-the-rsb-standard/>). Standards are also available, upon request, from SCS Global Services.

### 1.3 Sites in Scope

#### 1.3.1 Industrial Operators

1. Initial Köln Industrial Operator Audit	
<b>Name of Facility</b>	INEOS Manufacturing Deutschland GmbH
<b>Type</b>	<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: Acrylonitrile production plant
<b>Location/City</b>	Cologne
<b>Geographic location (<i>Latitude &amp; Longitude</i>)</b>	51°04'05.1"N 6°50'13.1"E
<b>Start date of operations (initial start date)</b>	Before 2015
<b>Number of processing steps</b>	1) Reactor: Propylene+Ammonia+Air (oxygen) 2) Recovery (quench, absorber, recovery column) 3) Purification (Heads & HCN columns, Drying column, Product column) Product: acrylonitrile By-products: ammonia sulphate, HCN, Acetonitrile, Reactants: sulphuric acid, acidic acid
<b>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.</b>	Propylene, bio-attributed. 70% of total ingredients of chemical reaction
<b>Annual throughput of previous 12 months</b>	
Business Confidential Information – See confidential annex	



2. Scope Extension – Green Lake Facility	
<b>Name of Facility</b>	Ineos Nitriles USA (Green Lake)
<b>Type</b>	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Vegetable oil Extraction <input type="checkbox"/> Biofuel Production and/or Distribution <input checked="" type="checkbox"/> Other, please explain here: Nitriles plant
<b>Address</b>	13050 State highway 185 N, Port Lavaca, Texas, 77979 USA
<b>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.</b>	Input: (Bio-attributed) Propylene, Ammonia Output: (Bio-attributed) Acrylonitrile, acetonitrile
<b>Annual throughput of previous 12 months</b>	
Business Confidential Information – See confidential annex	

**1.3.2 Traders or Warehouses See Appendix – Commercially Sensitive – See Annex**

**1.4 GHG Intensity**

Products from INEOS Manufacturing Deutschland GmbH (Köln)

Advanced products from Category III feedstocks:			
<b>Advanced Product:</b>	Bio-attributed Acrylonitrile	<b>GHG:</b>	1010 kg CO <sub>2</sub> eq/ dry ton
*Note that GHG intensity may vary as feedstock GHG intensity varies over time			

Scope extension: Products from INEOS Nitriles USA (Green Lake)

Advanced products from Category III feedstocks:			
<b>Advanced Product:</b>	Bio-attributed Acrylonitrile ( processing emissions only)	<b>GHG:</b>	1036.1 kg CO <sub>2</sub> eq/ dry ton Acrylonitrile

**1.5 Advanced Product Information**

Products from INEOS Manufacturing Deutschland GmbH (Köln)

<b>If the feedstock for a batch of RSB certified Advanced Product is not wholly but only partly RSB-certified: state the amount of certified feedstock in relation to the total mass of the feedstock for the appropriate category:</b>	N/A
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<b>For Category III products:</b>	
State the amount of primary fossil resources saved by the input of eligible feedstock in the production system	If 100% bio-attributed propylene is sourced and sold in the final product: 77% (1 ton of 100% bio-attributed propylene will produce 770 kgs of acrylonitrile with 100% bio-attributed propylene content).

Scope extension: Products from INEOS Nitriles USA (Green Lake)

<b>For Category III products:</b>	
State the amount of primary fossil resources saved by the input of eligible feedstock in the production system	If 100% bio-attributed propylene is sourced (credit transfer) and sold in the final product: 75% (1 ton of 100% bio-attributed propylene will produce 750 kgs of acrylonitrile with 100% bio-attributed propylene content).

## 2.0 EVALUATION PLANNING & PROCESS

### 2.1 Audit Team (Initial Köln Industrial Operator Audit)

<b>Auditor Name:</b>	Maite Lasa	<b>Auditor role:</b>	Lead Auditor
<b>Qualifications:</b> Maite is a certified Auditor against sustainability schemes including RSB, ISCC an Bonsucro. Previously she has worked as a sustainability consultant in renewable energy and in climate change mitigation, and in the biofuels sector particularly in the production of energy crops for biodiesel production. She has received a Master in Public Administration focused in energy and environment at the University of Columbia (New York, USA).			
<b>Auditor Name:</b>	Otavio Cavalett	<b>Auditor role:</b>	GHG Verifier
<b>Qualifications:</b> 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 Audit Team (INEOS Nitriles USA – Green Lake Scope Extension)

<b>Auditor Name:</b>	Miguel Ruiz	<b>Auditor role:</b>	Lead Auditor
<b>Qualifications:</b> Miguel is a certified auditor against sustainability schemes including RSB, ISCC, and ISO 14001, ISO 19011 and experienced LCA practitioner. Previously he worked as researcher in the decarbonization of energetic system at the French National Centre of Scientific Research (CNRS, France). He obtained a PhD in chemical engineering working on the topic of biomass co-refining at the French Agricultural Research Centre for International Development (CIRAD, France). He holds an advanced academic degree in Chemical Engineering from the University of Granada (Spain) and several specialization courses on LCA, carbon footprint, GIS and renewable energy.			
<b>Auditor Name:</b>	Raul Mitre	<b>Auditor role:</b>	Team Auditor (in training)
<b>Qualifications:</b> Raul Mitre is a professional and entrepreneur with more than 15 years of experience in sustainability, climate change, especially in Monitoring, Reporting and Verification and more than 20 years of experience in management systems. Raul has a degree in Industrial Administration, specializing in productivity and quality. He holds a Master's degree in Quality Management, a Master's degree in Project Management, a postgraduate degree in Integrated Management Systems, an MBA and he is currently studying his PhD in Sustainability. He is an approved auditor with SCS for RSB, ISCC and Bonsucro. He is also a qualified auditor with European certification bodies for GHG, ISO 9001, ISO 14001, ISO 45001, ISO 37001, ISO 50001 and ASCA.			
<b>Auditor Name:</b>	Otavio Cavalett	<b>Auditor role:</b>	GHG Verifier
<b>Qualifications:</b> 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 Biorenewables 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.			

## 2.3 Evaluation Schedule and Extent of Audit

### 2.3.1 Methodology and Strategies Employed

SCS deploys interdisciplinary teams with expertise in agriculture, ecology, forestry, social sciences, natural resource economics, and other relevant fields to assess an Operator’s compliance to RSB standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of site and facility types, observation of implementation of management plans and policies, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant site observations, stakeholder comments, and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of

evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section.

### 2.3.2 Evaluation Itinerary and Activities

#### 1. Initial Köln Industrial Operator Audit

Time	Element/Activity	Personnel Involved
<b>Auditor name:</b> Maite Lasa		
<b>Day 1</b> 22 Sept	<b>INEOS Manufacturing Deutschland GmbH/Köln, Nordrhein-Westfalen, Germany/Remote (online)</b>	
9:00 a.m.	<b>Opening Meeting and General Requirements</b> <ul style="list-style-type: none"> <li>▪ Introduction to RSB certification program and assessment process to on-site staff; confidentiality; method of reporting and NC grading, etc.</li> <li>▪ Review of scheduled activities</li> <li>▪ Identify workers to be interviewed according to staff scheduling during the audit: please provide a list of on-duty facility staff on 22 Sept. Ideally, they can speak English if possible.</li> <li>▪ Review of RSB procedures; confirm roles, responsibilities and processes</li> <li>▪ Confirmation of scope of products to be certified</li> <li>▪ Client to outline production process and overall process flow</li> <li>▪ Review of site map(s)</li> <li>▪ Review of Risk Assessment Tool</li> <li>▪ Review of Screening Tool</li> </ul>	Management
10:30 a.m.	<b>Document Review: Participating Operator/Standards Checklist</b> <ul style="list-style-type: none"> <li>– Self-evaluation record</li> <li>– Review of training procedures and records: provide records of RSB competency such as chain of custody management, data recording, material handling, claims management, etc.</li> <li>– Review of grievance mechanism and records: 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?</li> <li>– Review of traceability method and implementation (including acquiring, handling and forwarding of sustainable material);</li> </ul>	Management

	<ul style="list-style-type: none"> <li>- Review of records: Initial audit requires a review of record templates including for incoming material, material handling, and outgoing material / Proof of Sustainability forms. Link to company reporting system.</li> <li>- Meter calibration records</li> <li>- Analysis of material balances and records: Initial audit requires a review of template documents to ensure they are operable. Show method of conversion factor calculation. Show source of data and links to SAP (or similar), production control software and physical inventories.</li> <li>- Review of GHG inputs</li> <li>- Communications and claims</li> <li>- Requirements for Advanced Products</li> </ul>	
13:00	<b>Lunch Break</b>	
14:00	<b>Site walk-through (remote)</b> Please provide maps, high-res photos or videos of relevant sites and control points, including: <ul style="list-style-type: none"> <li>- control room</li> <li>- ponds/tanks/reservoir(s)</li> <li>- feedstock and product storage area</li> <li>- chemical storage and disposal</li> <li>- sludge repository or disposal</li> <li>- other critical control points (for ex. Measuring devices relevant for mass balance and traceability)</li> </ul>	Production, Warehouseman, and Post-Production Personnel
15:00	<b>Report writing</b> Auditor(s) take time to consolidate notes and confirm audit findings and prepare the closing meeting record	
16:00	<b>Review of day's findings</b>	
	<b>End of day 1</b>	

Time	Element/Activity	Personnel Involved
<b>Auditor name:</b> Maite Lasa		
<b>Day 2</b> 23 Sept	<b>INEOS Manufacturing Deutschland GmbH/Köln, Nordrhein-Westfalen, Germany/Remote (online)</b>	
9:00 a.m.	<b>Worker Interviews and HR meeting</b> <ul style="list-style-type: none"> <li>- Check piece work payments</li> <li>- Interview a small sample of male and female workers (3-4)</li> <li>- Interview union representative</li> </ul>	HR management  Workers

	<i>(For online interviews, request that management leave the room while workers are being interviewed.)</i>	
10:30 a.m.	<p><b>Document Review: Compliance with Principles and Criteria</b>            Ensure that risks identified in the Risk assessment tool and screening tool are directly addressed</p> <p>Principle 1:</p> <ul style="list-style-type: none"> <li>- Review of all relevant business licenses</li> <li>- Review of land and water use permits</li> <li>- Review of operator’s index of relevant laws and regulations and their compliance</li> </ul> <p>Principle 2:</p> <ul style="list-style-type: none"> <li>- Review Environmental and Social Management Plan (ESMP)</li> <li>- Review impact assessments (most recent Environmental Impact Assessment, Social Impact Assessment)</li> <li>- Review operator’s stakeholder engagement records. Review grievance mechanism for external parties and stakeholders</li> </ul> <p>Principle 7:</p> <ul style="list-style-type: none"> <li>- Conservation values, ecosystems, buffers, water rights</li> </ul> <p>Principle 8:</p> <ul style="list-style-type: none"> <li>- Soil quality practices, measurements, process plans and monitoring (e.g. in ESMP)</li> </ul> <p>Principle 9:</p> <ul style="list-style-type: none"> <li>- Water permits, water management plans and monitoring in ESMP</li> </ul> <p>Principle 10:</p> <ul style="list-style-type: none"> <li>- Air permits, air management plans and monitoring in ESMP</li> </ul> <p>Principle 11:</p> <ul style="list-style-type: none"> <li>- Use of technology: GMO, fertilizers, crop protection chemicals</li> <li>- Integrated waste management</li> <li>- Resource and energy use, energy efficiency</li> </ul> <p>Principle 12:</p> <ul style="list-style-type: none"> <li>- Review documentation of historic land use/land tenure, legal tenure. Land lease agreements</li> </ul>	Management and relevant operator staff
13:00	<b>Lunch break</b>	
14:00	<p><b>Report writing</b>            Auditor(s) take time to consolidate notes and confirm audit findings and prepare the closing meeting record</p>	
16:00	<p><b>Closing meeting</b></p> <ul style="list-style-type: none"> <li>- Presentation of general audit findings</li> <li>- Presentation of all non-compliances and opportunities for improvement</li> <li>- Review of closing meeting record</li> <li>- Establish timetables for signed closing meeting record, corrective action and submission of Correction Action Plan</li> </ul>	Management and relevant staff

	<ul style="list-style-type: none"> <li>- Overview of timetable for audit report completion</li> <li>- Reiterate SCS appeal and grievance policy</li> <li>- Questions</li> </ul>	
	<b>End of audit</b>	

**2. Scope Extension Audit (INEOS Nitriles USA – Green Lake) – A more detailed description of the audit activities and itinerary can be found in Appendix X.**

<b>Prior to the audit</b>	
<b>Operation(s)/ sites visited</b>	<b>Activities/ notes</b>
Stakeholder consultation	External stakeholders notified by email and contacted by email/telephone
<b>Date: May 23<sup>rd</sup> - Miguel Ruiz (remote), Bob Armantrout (on-site), Raul Mitre (on-site)</b>	
<b>Operation(s)/ sites visited</b>	<b>Activities/ notes</b>
Opening meeting	Presentations, plant layout, questions
Document review (I)	Principles and criteria -> principles covered: 1,2,3,4,7,9,10,11,12
Document review (II)	RSB Global Standard checklist / advanced product
Site walk-through	Internal stakeholders consultation not conducted because: (i) low risk classification of PO, (ii) results of screening test and, (iii) full compliance of PO with principle 4.
<b>Date: May 24<sup>th</sup> – Miguel Ruiz (remote), Bob Armantrout (on-site), Raul Mitre (on-site)</b>	
<b>Operation(s)/ sites visited</b>	<b>Activities/ notes</b>
Storage location 1	Opening, meeting, document review, site-walk through
<b>Date: May 31<sup>th</sup> – Miguel Ruiz (remote)</b>	
<b>Operation(s)/ sites visited</b>	<b>Activities/ notes</b>
Storage location 2	Opening, meeting, document review
<b>Date: June 2<sup>nd</sup> – Raul Mitre (on-site), Miguel Ruiz (remote)</b>	
<b>Operation(s)/ sites visited</b>	<b>Activities/ notes</b>
Storage location 3	Opening, meeting, document review
<b>Date: June 7<sup>th</sup> – Miguel Ruiz (remote), Raul Mitre (remote)</b>	
<b>Operation(s)/ sites visited</b>	<b>Activities/ notes</b>
Closing meeting	

## 2.4 Evaluation of Management System

### 2.4.1 Capacity of the participating operator to implement its management systems

The production site belonging to INEOS EUROPE AG scope of certificate has in place a robust management system consolidated in years of activity in the sector of petrochemical production, with procedures and working instructions controlling almost every aspect of the operations. At level of IT system the requested documents for traceability and bookkeeping are provided at any request and easily accessible since most process are fully automated and interlinked. The management of the RSB scheme has access to experienced teams in other units of Ineos group which are well-prepared. In any case, the RSB management team for Nitriles should not only rely on these teams and make its own effort to understand and implement the standard, and incorporate this aspect in upcoming training of new staff so that the full process from acquisition to forwarding, as well as the monitoring of the P&C is well under control.

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

#### Initial Köln Industrial Operator Audit

<p><b>Are all claims used in line with scope and allowed claims per RSB-PRO-50-001 or Advanced Product Standard, as applicable?</b></p>	<p>Declared in PO RSB Handbook that <i>“all external use of RSB claims and communication must be approved by the RSB Manager who will agree and confirm content with RSB and SCS before external publish where deemed applicable.”</i> The operator plans to use an off-product claim in substitution of the short-claim in the POS: <i>Over its production lifecycle, this material provides x% greenhouse gas savings compared to a fossil fuel equivalent.</i> Therefore, the operator will seek RSB approval prior to being selling RSB material.</p>
<p><b>If claims deviate from approved language in standard, signed document specifying claims approved by RSB:</b></p>	<p>See above</p>
<p><b>Does Operator use RSB trademarks on off-product or on-product claims?</b></p>	<p>No specific off-product claim has been defined yet. In any case, as reflected in the Handbook, the operator will seek RSB approval prior to any use of RSB claims. See above for on-product claims.</p>



**Scope Extension Audit (INEOS Nitriles USA – Green Lake)**

<b>Does Operator use RSB trademarks on off-product or on-product claims?</b>	Initial audit. No RSB activity yet. Only short claim in Proof of Sustainability template.
<b>Are all claims used in line with scope and allowed claims per RSB-PRO-50-001 or Advanced Product Standard, as applicable? Indicate specific claims used.</b>	PO plans to uses the claim “Over its production lifecycle, this material provides x% greenhouse gas savings compared to a fossil fuel equivalent”, which is included in the PRO-50-001.  Note: The % will be determined once the carbon intensity of the RSB-compliant feedstock becomes available from the supplier.
<b>If claims deviate from approved language in standard, signed document specifying claims approved by RSB:</b>	Claims in line with RSB standard

**2.5 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.

**2.5.1 Summary of Stakeholder Comments and Responses (Initial Köln Industrial Operator Audit)**

<b>Stakeholder Comments</b>	<b>SCS Response</b>
<b>Economic Concerns</b>	
N/A	Community is happy with working conditions offered by Ineos
<b>Social Concerns</b>	

N/A	INEOS provides training opportunities for students in the community and visits to the site
<b>Environmental Concerns</b>	
N/A	Some news appears in local newspaper every now and then on excess methane flaring, but they seem to be isolated events. The auditor did not find any sample of such news online.

**2.5.2 Summary of Stakeholder Comments and Responses (INEOS Nitriles USA – Green Lake Scope Extension audit)**

<b>Stakeholder Comments</b>	<b>SCS Response</b>
<b>Economic Concerns</b>	
N/A None received	No economic concern raised by stakeholders. The participating operator provides jobs in the local community.
<b>Social Concerns</b>	
N/A None received	None of the stakeholder indicated any social concern related to the activity of the participant operator in the area. Community is happy with working conditions offered by the participant operator.
<b>Environmental Concerns</b>	
N/A None received	Auditor reviewed the local media for any new/article related to an environmental issue caused by the participant operator. Two articles were found detailing two isolated accidents. Several questions were formulated to the participant operator about these incidents to clarify and assess the impact on the environment.

**3.0 RESULTS OF THE EVALUATION**

**3.1 Process of Determining Compliance**

**3.1.1 Structure of Standard and Degrees of Non-Compliance**

Consistent with SCS Sustainable Biofuels Program evaluation protocols, the audit team collectively determines whether or not the Participating Operator and entities in scope are compliant with every applicable indicator. Each non-compliance is evaluated to determine whether it constitutes a major or minor non-compliance. 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.

### 3.1.2 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.

### 3.1.3 Major Non-compliances

#### Initial Köln Industrial Operator 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.

#### INEOS Nitriles USA – Green Lake Scope Extension audit

<input checked="" type="checkbox"/>	No major NCs were issued to the Operator during the evaluation. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major NCs were issued to the Operator during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major NCs were issued to the Operator during the evaluation and the Operator has not yet satisfactorily closed all major NCs.

### 3.1.4 Non-compliances and Current Status

#### Initial Köln Industrial Operator 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)
2021-1	minor	Principle 2.a.6, Implementation of P4 and P12	The operator was able to provide to the auditor evidence for compliance of the other RSB Principles and Criteria requirements. The ESMP should include more detail: <ul style="list-style-type: none"> <li>- justification of non applicability of principles 4 and 12</li> <li>- applicable requirements of principles 7, 9 (including revision from Screening Tool in section 5.2c), 10 and 11.</li> </ul>	Open
2021-2	Opportunity for improvement	RSB-PRO-30-001 F.2.8 (Checklist 1.10)	The operator has presented the RSB checklist populated with general comments that didn't cover the nuances of the requirements, which can hinder the ability to demonstrate compliance with the requirements.	Open
2021-3	Opportunity for improvement	RSB-PRO-20-001 F.1.5 (Checklist 2.1, 2.3)	Training records can be more well organized to demonstrate compliance with the standard. It is important that all relevant staff involved in the RSB management system read and understand all the applicable standard documents, which can be included as part of the training documentation. If there are interpretation questions, the SCS and RSB are available for clarification.	Open
2021-4	Observation	RSB-STD-02-001, F.6.1	The claim that the operator is planning to use, which is reflected in the RSB Product Handbook – INEOS Nitriles Cat III, must be approved by RSB prior to being used. The operator	Open

			plans to reflect this claim in the POS in substitution of the RSB short claim.	
5-2021	Observation	RSB-STD-02-001, F.2.1.2	GHG data complexity resulted in challenges during the audit to confirm emission factors. These shall be reviewed by the GHG verifier.  Closed: Evidence – the GHG verifier confirmed that the internal systems at site are able to provide accurate GHG emission factors.	Closed
6-2021	Observation	RSB-STD-02-001, F.3.3.2	If the operator makes its RSB claim on the final product, it must find out how normalization applies to calculate feedstock demand considering both fossil derived feedstocks.	Check next audit
7-2021	Observation	RSB-PRO-30-001 F.2.6 (Checklist 4.1)	The operator is working on setting up a link as a "sustainability contact tab" in INEOS Nitriles webpages. This is not yet implemented but it is reflected in the ESMP.	Check next audit
8-2021	Observation	RSB-PRO-20-001 F.2.6 (Checklist 5.1)	The SAP codes are not yet implemented and could not be observed at the time of audit.	Check next audit

### Green Lake 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	Opportunity for improvement	Requirement F.2.8 of the RSB-PRO-30-001  Criteria 1.10 of the RSB Global checklist	Although the self-evaluation was complete and available to auditor prior to the audit, it could be more comprehensive in the future to provide better transparency into the audit outcomes.	Open
2022-2	Opportunity for improvement	Requirement F.2.8 of the RSB-STD-11-001	Although the GHG calculation tool was complete and available to auditor prior to the audit, the auditor found difficulties to understand the calculation methodology because the GHG tool was poorly structured.	Open

		Criteria 9.3.3 of the RSB Global checklist	Therefore, there is room for improvement in the structure and content of the GHG tool.	
2022-3	Major – added in technical review	RSB-STD-02-001 F.6.3 and RSB-RG-2019-06 (RSB Reactive Guidance on Advanced Products Claims, September 2019  Global Checklist 14.13.1	The Standard for Advanced Products para F.6.1 says "Operators shall use the short claim RSB compliant Advanced Product." Guidance 19-09-19 RG-2019-06 Advanced Product Claims part 3 notes that "In addition to the claim RSB Compliant Advanced Product, certified operators may other claims. The operator's Proof of Sustainability form does not include the Short Claim as required in the standard.	Open

## 4.0 CERTIFICATION DECISION

Certification Recommendation		
<b>For Initial and Re-certifications: Operator to be awarded RSB certification subject to the minor non-compliances stated in Section 4.2.5.</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
<b>For Scope Extension: Operator to be awarded RSB certification subject to the minor non-compliances stated in Section 4.2.5.</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
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"/> <b>No Major NCs issued</b> <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"/>	
<b>To be completed by Certification Decision-Making Entity</b>	<b>Technical Review by:</b> If different to decision-maker	Initial audit: Robert Earley Scope extension: Robert Earley
	<b>Certification decision:</b>	RSB Global certificate is awarded according to the standards listed in section 1.2.4. With a low risk class, the certificate is valid for 5 years from this date.  Scope extension: Addition of the INEOS Nitriles USA (Green Lake) industrial operator to scope is awarded according to the standards listed in Section 1.2.4.
	<b>Certification decision by:</b>	Initial audit: Robert Earley Scope extension: Robert Earley
	<b>Date of decision:</b> For initial or continued certification	Initial audit: 20 December, 2021 Scope extension: 15 July, 2022
	<b>Surveillance schedule:</b>	First surveillance audit of Koln site must occur by 19 December, 2022.  First surveillance audit of Green Lake site must occur by 14 July, 2023.