

# Certification Evaluation Report

*Roundtable on Sustainable Biomaterials*

*Global Advanced Products*

*INEOS Europe AG – Oxide*

**SCS Certificate Code: SCS-RSB/PC-0047**

Alte Str. 201, Cologne, Germany

Bart Loos

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

CERTIFIED	EXPIRATION
9 February 2022	8 February 2027

DATE(S) OF AUDIT
6-7 December 2021
DATE OF LAST UPDATE
21 March 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 – Oxide		
Operator Number	2122		
Contact person	Bart Loos		
Address	Alte Str. 201, Cologne, Germany	Telephone	+32 3 250 90 10
		Fax	
		e-mail	bart.loos@ineos.com
		Website	https://www.ineos.com/businesses/ineos-oxide/

#### 1.2 Scope of Certificate

Please select one:	<input type="checkbox"/> RSB EU RED	<input checked="" type="checkbox"/> RSB Global
Please select boxes that apply:	<input type="checkbox"/> Pre-assessment <input checked="" type="checkbox"/> Initial Assessment <input type="checkbox"/> Re-certification <input type="checkbox"/> Follow-Up to NCs	<input type="checkbox"/> 1st Annual Surveillance <input type="checkbox"/> 2nd Annual Surveillance <input type="checkbox"/> 3rd Annual Surveillance <input type="checkbox"/> 4th Annual Surveillance
Scope as it appears on certificate:	<b>Production of bio-attributed ethylene oxide from bio-attributed ethylene</b>	
The scope assessment agrees with the scope under which the operator applied	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If no, please explain:		
<p><i>Note 1: If the scope is different, please contact SCS.</i></p> <p><i>Note 2: Where the client uses external organizations (public or private) to provide utilities services, such as electricity, waste disposal, water, the auditor shall check that these organizations are run according to local requirements (i.e. the law) but these organizations will not be considered in scope of the audit. Therefore no on-site visits to these utility services are required.</i></p>		
<b>Total workers covered by scope of certification:</b>	144 staff serve the unit, 23 people dedicated	

### 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	One industrial operator
Participating Operator Risk Class	Low Risk
Disputes or prior Non-compliances	None – initial audit

### 1.2.2 Standards Used

#### Applicable RSB-Accredited Standards

Standard Name	Standard number and version	Date of Standard
RSB Principles and Criteria	RSB-STD-01-001 V3.0	November 2016
RSB Procedure for Traceability (Chain of Custody)	RSB-PRO-20-001 V3.2	May 2020
RSB Procedure for Participating Operators	RSB-PRO-30-001 V3.3	June 2021
RSB Procedure for Communications and Claims	RSB-PRO-50-001 V3.5	November 2020
RSB Procedure for Risk Management	RSB-PRO-60-001 V3.3	May 2021
RSB GHG Calculation Methodology	RSB-STD-01-003-01 V2.3	August 2017
RSB Standard for Advanced Products	RSB-STD-02-001 V2.0	December 2018

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	INEOS Manufacturing Deutschland GmbH Oxide Unit
Type	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Vegetable oil Extraction <input type="checkbox"/> Biofuel Production and/or Distribution <input checked="" type="checkbox"/> Other, please explain here: <b>Ethylene Oxide production</b>
Location/City	Cologne, Germany
Geographic location ( <i>Latitude &amp; Longitude</i> )	51.07545, 6.84902
Start date of operations (initial start date)	1978

Number of processing steps	<ol style="list-style-type: none"> <li>1) Reaction: Ethylene + Oxygen --&gt; Ethylene oxide (EO)</li> <li>2) Adsorption of EO</li> <li>3) Desorption of EO</li> <li>4) Removal of light components</li> <li>5) EO distillation</li> </ol> Product: Ethylene Oxide By-product: Glycol
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.	Production of Bio-attributed Ethylene Oxide
<b>Annual throughput of previous 12 months</b>	
Feedstock Input (Metric Ton)	0 – initial audit
Final/Primary Product Output (Metric Ton)	Initial audit
Intermediate/by-product Output (Metric Ton)	Initial audit
% output yield compared to input material (total output/total input)	99% based on historical data
Amount sold as RSB certified (tons)	0 – initial audit

### 1.3.2 Traders or Warehouses

Limited Risk Sales Entity	
<b>1. Name</b>	INEOS Sales Belgium (sales entity only)
<b>Location/City</b>	Rue de Ransbeek 310, 1120 Bruxelles, Belgium
<b>Material stored:</b>	N/A sales unit only

### 1.4 GHG Intensity

<b>Advanced products from Category III feedstocks:</b>			
<b>Advanced Product:</b>	<b>Bio-attributed Ethylene Oxide</b>	<b>GHG:</b>	<b>855.2 kgCO<sub>2</sub>eq/dry-ton (ep for processing Bio-attributed Ethylene Oxide)</b>

### 1.5 Advanced Product Information

<b>If the feedstock for a batch of RSB certified Advanced Product is not wholly but only partly RSB-certified: state the amount of certified feedstock in relation to the total mass of the feedstock for the appropriate category</b>	<b>Initial audit. All certified products are planned to be 100% RSB certified</b>
<b>For Category III products:</b>	
<b>State the amount of primary fossil resources saved by the input of eligible feedstock in the production system</b>	<b>Initial audit. The estimated yield of the conversion</b>

	<p><b>process is 87.1%. Based on 3-year historical average. Therefore, it is estimated that for 1 Mt of output bio-attributed material, 726 kg of Fossil ethylene is displaced in the production system</b></p>
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## 2.0 EVALUATION PLANNING & PROCESS

### 2.1 Audit Team

<b>Auditor Name:</b>	Robert Earley	<b>Auditor role:</b>	Lead Auditor
<p><b>Qualifications:</b> Robert Earley has been a lead auditor of RSB, Bonsucro and ISCC certifications since 2017, and is a certified lead verifier of the California Low Carbon Fuel Standard, and has been trained in ISO 9001:2015 auditing. He is also the RSB Certification Program Manager at SCS Global Services. Mr. Earley, who has lived in China since 2004 and is fluent in Mandarin Chinese, studied environmental science at the University of Calgary and Urban and Regional Planning at the University of Waterloo in Canada. His coursework at the University of Calgary included industrial chemistry.</p>			
<b>Auditor Name:</b>	Otavio Cavalett	<b>Auditor role:</b>	GHG Verifier
<p><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.</p>			

### 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 as a remote audit via Microsoft Teams with auditors and operator staff joining remotely as necessary and appropriate due to conditions imposed by the COVID-19 pandemic in Europe.

**2.2.3 Evaluation Itinerary and Activities**

Time	Element/Activity
Pre-audit	<b>Stakeholder engagement</b> <b>Conducted by e-mail and/or phone prior to audit</b> <b>Auditor: Robert Earley (lead auditor)</b>

Time	Element/Activity	Personnel Involved
<b>Auditor(s) names:</b> Robert Earley (lead auditor) Bob Armantrout (ISCC Auditor)		
<b>Day 1 - 6</b> December 2021	<b>INEOS Oxides</b> <b>Remote audit – Video conference software</b>	
8:00 a.m.	<b>Opening Meeting and General Requirements</b> <ul style="list-style-type: none"> <li>- Introduction to certification programs and assessment process to on-site staff; confidentiality; safety procedures; 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</li> <li>- Review of RSB procedures; confirm roles, responsibilities and processes</li> <li>- Confirmation of scope of products to be certified: products and product groupings, clarification of all suppliers, transportation, storage</li> <li>- Client to outline production process and overall process flow with a presentation that notes all key feedstock sources, processes, material flows, storage facilities and document flows</li> <li>- Review of site map(s)</li> <li>- Review of RSB Risk Assessment Tool</li> <li>- Review of RSB Screening Tool</li> </ul>	Management

	<ul style="list-style-type: none"> <li>- Review of any difference between ISCC and RSB scopes</li> </ul>	
	<p><b>Document Review: Compliance with Principles and Criteria (RSB)</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 (if applicable or identified in screening tool)</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 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>	Relevant legal, environmental staff and managers
1:00 p.m.	<p><b>Lunch Break</b></p> <ul style="list-style-type: none"> <li>- Please take an efficient lunch that allows us to return to the audit meeting on-time.</li> </ul>	
2:30 p.m.	<p><b>Document Review: Participating Operator/Standards Checklist</b>  <b>Additional auditor: Bob Armantrout, ISCC auditor</b></p> <ul style="list-style-type: none"> <li>- Confirmation of roles for RSB and ISCC scopes</li> <li>- Review of training plans, procedures and records</li> <li>- Review of grievance mechanism and records</li> <li>- Review of traceability method and implementation (including acquiring, handling and forwarding of sustainable material); meter calibration records, laboratory procedures and certifications</li> <li>- Analysis of accounting systems like material balances and records</li> <li>- Review of records: delivery notes, weighbridge tickets, tracking documents, feedstock purchase and product sales contracts, delivery note templates, etc.</li> </ul> <p>Principle 4:</p>	Management

	<ul style="list-style-type: none"> <li>- Review of employee contracts and job descriptions: focus on those responsible for handling/managing RSB and ISCC management and material processes</li> <li>- Work conditions, piece work and living wage, equality issues, etc.</li> <li>- Review of employee and third-party worker contracts, policies, training records and employee grievances</li> <li>- Training and occupational health and safety records</li> <li>- Records for freedom of association (union) mechanism</li> </ul>	Human Resources manager
4:45 p.m.	<p><b>Report writing</b></p> <p>Auditor(s) take time to consolidate notes and confirm audit findings and prepare the closing meeting record</p>	
5:00 p.m.	<b>Review of day's findings</b>	
	<b>End of day 1</b>	

Time	Element/Activity	Personnel Involved
<b>Auditor(s) names:</b> Robert Earley (lead auditor) Bob Armantrout (ISCC Auditor)		
<b>Day 2 - 7</b> December 2021	<b>INEOS Oxides</b> <b>Remote audit – Video conference software</b>	
	<p><b>Document Review: Compliance with Principles and Criteria (RSB)</b></p> <p>Ensure that risks identified in the Risk assessment tool and screening tool are directly addressed</p> <ul style="list-style-type: none"> <li>- Any remaining Principles/Criteria that could not be covered on Day 1</li> </ul>	
11:00 a.m.	<p><b>Site walk-through: For online audits, please provide high-definition images of the following and/or prepare a site tour using a mobile camera.</b></p> <ul style="list-style-type: none"> <li>- Observe operations at processing facility</li> <li>- Observe control room – including high definition photos of control screens</li> <li>- Observe ponds/tanks/reservoir(s)</li> <li>- Observe feedstock and product storage area</li> <li>- Observe chemical storage and disposal</li> <li>- Observe other critical control points</li> </ul>	Production, and Post-Production Personnel
2:00 p.m.	<b>Worker Interviews</b>	

Time	Closing meeting	Personnel Involved
<b>Auditor(s) names:</b> Robert Earley, Lead auditor; Bob Armantrout (ISCC Auditor)		
Day 3 – 10 December, 2021	<b>INEOS Oxides</b>  <b>Remote audit – Video conference software</b>	
3:00 p.m.	<b>Closing meeting</b> <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> <li>– Overview of timetable for audit report completion</li> <li>– Reiterate SCS appeal and grievance policy</li> <li>– Questions</li> </ul>	Management
<b>End of Audit</b>		

## 2.3 Evaluation of Management System

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

INEOS Manufacturing Deutschland GmbH, the operator of the oxide unit in the scope of certificate has in place a robust management system consolidated over 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 are easily accessible since most process are fully automated and interlinked. The management of the RSB scheme at the oxide unit has access to experienced teams in other units of INEOS group at the same site which are well-prepared. The RSB management of the Oxide unit has taken time 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 Evaluation of RSB compliance claims and use of RSB trademarks

<b>Are all claims used in line with scope and allowed claims per RSB-PRO-50-001 or Advanced Product Standard, as applicable?</b>	Yes, proposed claims are used in line with scope and allowed per the Advance Product standard.
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<b>If claims deviate from approved language in standard, signed document specifying claims approved by RSB:</b>	N/A
<b>Does Operator use RSB trademarks on off-product or on-product claims?</b>	The operator plans to use off-product claims in addition to the short claim on the Proof of Sustainability document for products.

**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 (for Main audits)**

The site, INEOS Manufacturing Deutschland GmbH has been audited several times in the past 12 months with stakeholder consultations conducted. Stakeholders, as in previous RSB audits, did not offer additional information during this audit.

<b>Stakeholder Comments</b>	<b>SCS Response</b>
<b>Economic Concerns</b>	
N/A	Stakeholders did not express any concerns regarding the economic outcomes of this project
<b>Social Concerns</b>	
N/A	Stakeholders did not express any concerns regarding the social outcomes of this project
<b>Environmental Concerns</b>	
N/A	Community did not express any concerns regarding the environmental outcomes of this project

### 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
Oxide Unit	0	Low	26 Nov 2021	Agrees
Overall Risk				Low

### 4.0 RESULTS OF THE EVALUATION

#### 4.1 Process of Determining Compliance

##### 4.1.1 Structure of Standard and Degrees of Non-Compliance

RSB-accredited biofuel standards consist of a three-level hierarchy: the principle, the criteria that correspond to that principle, and then the performance indicators that elaborate upon each criterion. Consistent with SCS Sustainable Biofuels Program evaluation protocols, the team collectively determines whether or not the subject operation is in compliance with every applicable indicator of the relevant sustainable biofuel standard. Each non-compliance must be evaluated to determine whether it constitutes a major or minor non-compliance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in non-compliance. The team therefore must use their collective judgment to assess each criterion and determine if the Operator is in compliance. If the Operator is determined to be in non-compliance at the criterion level, then at least one of the applicable indicators must be in major non-compliance.

##### 4.1.2 Interpretations of Findings

*Major Non-compliances*, either alone or in combination with non-compliances of other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant RSB Criterion. These non-compliances must be resolved or closed out before a certificate can be awarded. If Major NCs arise after an operation is certified, the timeframe for correcting these non-compliances is typically no more than three months. Certification is contingent on the operator's response to the NCs within the stipulated time frame.

*Minor Non-compliances* are typically limited in scale or can be characterized as an unusual lapse in the system. Most minor NCs are the result of a non-conformance at the indicator-level. Non-compliances must be closed out within a specified time period of award of the certificate.

*Opportunity for Improvement* is an observation made which does not fully impact compliance but could potentially affect the PO’s ability to comply with RSB requirements in the future.

**4.1.3 Major Non-compliances**

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

**4.1.4 Non-compliances and Current Status**

Summary of Non-compliances and Current Status				
Non-compliance Number	Type of Non-compliance	Relevant RSB Standard & Indicator No.	Summary of Finding and Evidence Collected	Status of Non-compliance (Open/Closed)
No non-conformities were found during the assessment				

## 5.0 CERTIFICATION DECISION

Certification Recommendation		
<b>For Initial and Re-certifications: Operator to be awarded RSB certification subject to the minor non-compliances stated in Section 4.2.5.</b>		
Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Responsible Biofuels Program evaluation protocols. If certification is recommended, the Operator has satisfactorily demonstrated the following without exception:		
Operator has addressed any Major NC(s) assigned during the evaluation.	Yes <input type="checkbox"/> No <input type="checkbox"/> No Major NCs issued <input checked="" type="checkbox"/>	
Operator has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards are met over the sites and facilities covered by the scope of the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Operator has demonstrated that the described system of management is being implemented consistently over the sites and facilities covered by the scope of the certificate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments and/or details of any issue which was difficult and/or impossible to evaluate:		
<b>To be completed by Certification Decision-Making Entity</b>	<b>Technical Review by:</b> If different to decision-maker	Inna Kitaychik
	<b>Certification decision:</b>	SCS confirms that INEOS Oxide meets the RSB requirements lists in section 1.2.2
	<b>Certification decision by:</b>	Inna Kitaychik
	<b>Date of decision:</b> For initial or continued certification (scope expansion decisions list separately)	February 9, 2022
	<b>Surveillance schedule:</b>	1 <sup>st</sup> Surveillance by February 9, 2023  Notes:

### Sub Certificate Codes (if applicable)

Legal Entity/Operational Site	Sub-Certificate Code