

# **RSB – ROUNDTABLE ON SUSTAINABLE BIOMATERIALS**

**REPORT TO THE EU COMMISSION**

on

Assurance

Stakeholder Involvement

Market Updates

Reporting Period:

01 January 2022 – 31 December 2022

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# Report to the EU Commission

1 January 2022 – 31 December 2022

## Introduction

The **Roundtable on Sustainable Biomaterials (RSB)** is an independent and global multi-stakeholder coalition, which works to promote the sustainability of biofuels and advanced fuels as well as biomaterials and advanced materials. Producers and processors and their supply chains can become certified to the RSB Standard. RSB certification is acknowledged by WWF, IUCN and the Natural Resources Defence Council as the strongest and the most trusted of its kind. The RSB is a full member of the ISEAL Alliance which sets Codes of Good Practice for multi-stakeholder sustainability standards. Compliance with ISEAL requirements is a rigorous process and has only been achieved by a limited number of global sustainability standards. The EU Commission recognised RSB EU RED for demonstrating compliance with the sustainability criteria under Directive 2018/2001 of the European Parliament and of the Council. This report to the EU Commission is required under Directive 2018/2001/EC and describes RSB's assurance mechanisms to ensure audit consistency and rigour, shows how the RSB works to involve stakeholders and supports market uptake of the scheme.

### a) Audits

The European Commission requires that voluntary schemes report on the *“independence, modality and frequency of audits, both in relation to what is stated on those aspects in the scheme documentation, at the time the scheme concerned was approved by the Commission, and in relation to industry best practice”*

The RSB system employs a risk-based approach and risk assessments are used throughout the process to ensure both efficiency and effectiveness. The evaluation of the RSB Principles and Criteria, which set out the sustainability criteria of the RSB, is based on the RSB Screening Tool<sup>1</sup>. This tool helps operators and auditors to better understand the sustainability related risks relevant to their operations and guides them to areas that need more focus. The RSB Assurance System, as laid out in *RSB-PRO-70-001 Requirements for Certification Bodies and Auditors*<sup>2</sup>, ensures that regular audits are carried out by independent and competent auditors. The RSB requires annual surveillance audits while the certificate validity depends on the risk of the operator. For low-risk operators, certificates are valid for 5 years, for medium risk operators 3 years and for high-risk operators 2 years. The operators' risk is evaluated based on the RSB Risk Management procedure<sup>3</sup> which provides a risk evaluation tool<sup>4</sup> for operators and auditors. Depending on the risk level of the operator, certification bodies may also decide if surveillance audits are conducted on-site or desk based. *RSB-PRO-70* includes a robust system for assessing if desk-based audits can be allowed. Auditors are appointed by Certification Bodies (CBs) that are required to implement risk management systems in order to minimise risks which could compromise the comprehensive and consistent implementation of the RSB standard. CBs are

<sup>1</sup> [https://rsb.org/wp-content/uploads/2020/06/21-08-18-RSB-Screening-Tool-\\_v3.0.xlsx](https://rsb.org/wp-content/uploads/2020/06/21-08-18-RSB-Screening-Tool-_v3.0.xlsx)

<sup>2</sup> <https://rsb.org/wp-content/uploads/2020/06/RSB-PRO-70-001-v.4.0-Procedure-CBs-and-Auditors-1.pdf>

<sup>3</sup> <https://rsb.org/wp-content/uploads/2020/06/RSB-PRO-60-001-vers-3.3-Procedure-for-Risk-Management.pdf>

<sup>4</sup> [https://rsb.org/wp-content/uploads/2020/08/21-05-27-RSB-Risk-Assessment-Tool\\_v4.0.xlsx](https://rsb.org/wp-content/uploads/2020/08/21-05-27-RSB-Risk-Assessment-Tool_v4.0.xlsx)

independent organisations accredited to carry out certification activities against the RSB standard. In the RSB system, on-site audits are carried out annually in line with the international standard *ISO 19011* which provides guidance on the management of an audit programme, on the planning and conducting of an audit as well as on the competence and evaluation of auditors and audit teams. Auditors are required to use the RSB auditor's checklist to ensure that all requirements are covered in the evaluation process. In addition, RSB's Assurance System requires Certification Bodies to comply with the international standard *ISO 17065* to ensure that they operate in a competent, consistent and impartial manner. The independence of the CBs is ensured through compliance with *ISO 17065* which sets detailed requirements to manage impartiality. The RSB Assurance System is fully in line with the ISEAL Assurance Code which was developed by ISEAL as a Code of Good Practice for Assuring Compliance with Social and Environmental Standards and which is considered industry best practice<sup>5</sup>.

An important element in the context of risk is stakeholder engagement, that is required throughout the certification process and includes the following steps:

- For every new application, a global stakeholder consultation (through a dedicated mailing list and publication on the RSB website) and an initial due diligence assessment is conducted by the RSB Secretariat;
- Auditor's stakeholder consultation 2-4 weeks ahead of the audit to reach out to specific stakeholders;
- Operator's stakeholder engagement

## b) Dealing with Non-Compliances

The European Commission requires that voluntary schemes report on the *"availability of, and experience and transparency in the application of, methods for identifying and dealing with non-compliance, with particular regard to dealing with situations or allegations of serious wrongdoing on the part of members of the scheme"*

Areas where an operator does not meet the requirements of the RSB standard are designated as 'non-compliances' which are graded in two categories: '*minor*' non-compliance and '*major*' non-compliance. Situations that are defined as major non-compliances are described in *RSB-PRO-70-001 Requirements for Certification Bodies and Auditors* and include:

- A non-compliance with a minimum requirement in the RSB Principles & Criteria.
- A non-compliance with a mandatory requirement in the EU Renewable Energy Directive (2018/2001/EC).
- Management systems implemented by the PO which are not applied comprehensively and consistently to all units in the certification scope of the PO.
- Non-compliances with the potential to compromise the RSB, RSB standard, RSB certification systems, RSB trademarks or the good name of the RSB or its Accreditation Body.
- Minor non-compliances issued in the preceding evaluation which have not been corrected, rectified or otherwise brought into compliance with the RSB standards prior to the evaluation.
- Non-compliances which are systematic in nature (i.e. non-compliances which will continue to result in further non-compliances until they have been corrected, rectified or otherwise brought into compliance with the RSB standards.
- Non-compliances which cannot possibly be corrected, rectified or otherwise brought into compliance with the RSB standard.

<sup>5</sup> <https://www.isealalliance.org/credible-sustainability-standards/iseal-codes-good-practice>

In the case of an outstanding major non-compliance, a certificate cannot be issued. If non-compliances occur, operators are asked to assess the root causes and define corrective action measures including a timeline for implementation. The certification body is responsible for evaluating that the corrective actions have been implemented in a timely manner (i.e. 90 days for major non-compliances and 12 months for minor non-compliances). If non-conformities are not addressed according to the corrective action plan, upon finding evidence of misuse, misrepresentations or fraudulent claims or occurrence of a severe major non-conformity, the RSB Assurance System requires CBs to suspend the certificate. For all non-compliances the following information is included on the Public Audit Summary which is available online for all certified operators:

- their classifications as major or minor;
- the actions undertaken to address the non-conformity;
- evaluation of the corrective action.

The RSB continuously tracks areas of non-compliance through the audit and certification process. This data allows RSB to draw conclusions about the main areas of impact through RSB implementation, as well as requirements that are particularly difficult to achieve:

**The following figure shows non-compliances (major and minor) that were raised in 2022 in the different technical areas of the RSB EU RED standard in percentage relative to the total number of non-compliances raised:**

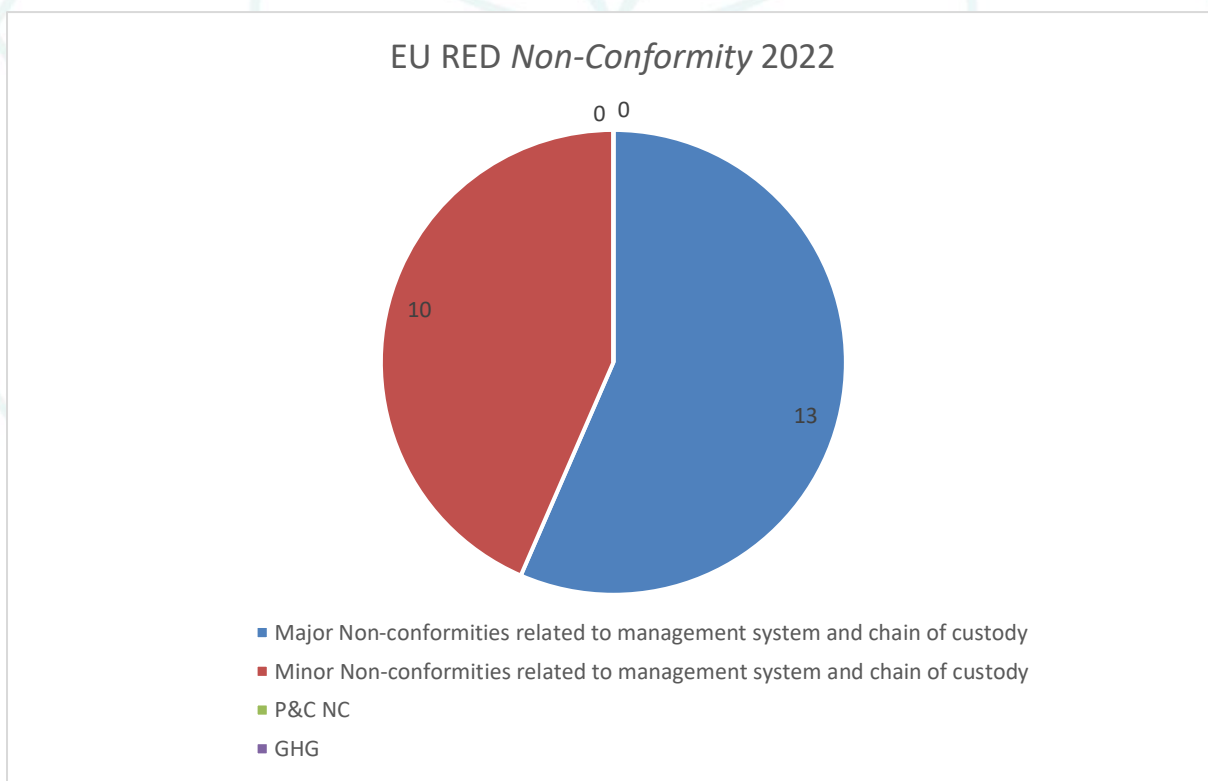


Figure 1: Number & types of Non-Conformity raised under RSB EU RED in 2022. Total = 23.

Figure 1 shows that the all of the issues raised related to chain of custody / traceability in 2022.

The RSB Secretariat also evaluates how the technical content of non-compliances changes over the years. Figure 2 shows the average number of non-compliances raised per Economic Operator, by technical area of the RSB EU RED Standard. The figure shows a slightly reduced number of non-compliances related to all technical areas compared with 2021, and vastly reduced compared with 2020. This aligns with the RSB's experience that operators have become more familiar with EU RED requirements. In addition, no new RSB EU RED operators joined in 2022 and thus no operators companies went through the certification process for the first time, therefore one would expect improvements in compliance due to increased understanding of system requirements.

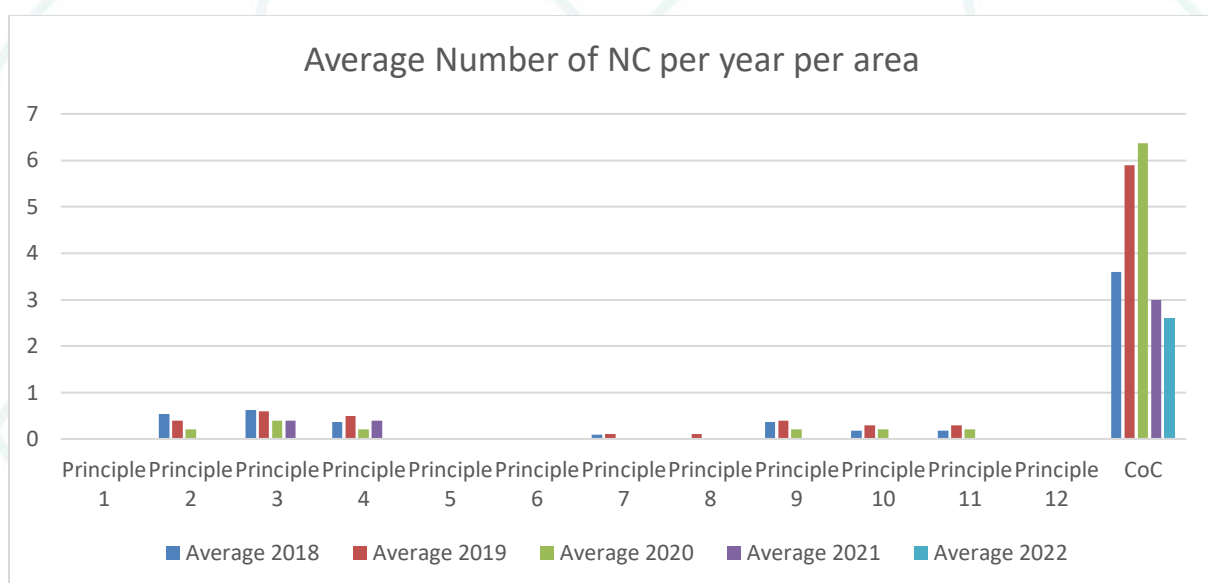


Figure 2: Average number of non-conformities per RSB EU RED EO, by area and year

### c) Transparency and Accessibility of the Scheme

The European Commission requires that voluntary schemes report on the “*transparency, particularly in relation to the accessibility of the scheme, the availability of translations in the applicable languages of the countries and regions from which raw materials originate, the accessibility of a list of certified operators and relevant certificates, and the accessibility of auditor reports*”

The RSB certification system is accessible to multi-feedstock certifications and can be applied in any region of the world. RSB can certify a complete supply chain from farm/forest as well as novel biomass and circular material technologies such as oil and sugar-based biofuels, cellulosic ethanol and chemicals, renewable and circular (non-bio-based recycled) diesel and biojet, bio- and circular plastics, lubricants and other bio- and non-bio-based (recycled) chemicals.

The website [www.rsb.org](http://www.rsb.org) provides explanations of the RSB standard and the certification process to help operators to understand better how to implement the RSB requirements.<sup>6</sup>

The official version of the RSB Standard is the English language version which is available online including all guidance and support documents. Transparency is one of the core values of the RSB.

<sup>6</sup> <http://rsb.org/certification/>

Therefore, a list of certified operators, all certificates (valid, expired, terminated) as well as Audit Summary Reports are available online.<sup>7</sup> The content of the Public Audit Summaries is defined in RSB-PRO-70-001 *Requirements for Certification Bodies and Auditors* and includes inter alia:

- The risk assessment conducted by the lead auditor.
- The observations and substantiating evidence collected during evaluation of the central management office and management systems of the operator.
- The consultation of social, environmental and economic stakeholders that are directly affected by the operation(s) identified in the certification scope of the operator.
- Non-compliances, and whether (and why) these non-compliances were classified as major non-compliances.
- Actions taken to address non-compliances, the evaluation of those actions and decision to accept them for compliance with RSB standards.
- The final risk class assigned to the operator based on the risk assessment.
- The validity period of the issued certificate and schedule for surveillance and main audits.
- The details of any issue which was difficult or impossible to evaluate.

The RSB website includes a section focused on auditors and assurance which lists the recognised certification bodies and the RSB accreditation body, including main contact information. In addition to the standard documents, the RSB issues guidance documents whenever interpretation on a specific requirement is needed.

All certification applications are subject to a public consultation via the RSB website<sup>8</sup>. This is the first step in the RSB certification process, and allows members of the public to voice any concerns they might have about the sustainability of the operations of the applicant.

In 2022, RSB stakeholders received multiple general updates informing them about updates in the RSB system, for example webinar invitations, new members, certified operators, standard developments or partnerships. In addition to the regular newsletter, the RSB updates stakeholders via social media (Twitter and LinkedIn). The RSB also held 27 events and webinars for its stakeholders in 2022, including at 3 in-persons events in the United States, Brazil and South Africa.

Related to certification, system documents applicable to the RSB EU RED certification system begun revision in 2022, in-line with EU RED IR updates. These system documents shall be finalised in 2023 following positive assessment to the new regulations.

In 2022, 27 public consultations for the certification of RSB operators were carried out.

RSB sets out the procedure for dealing with complaints in the RSB Grievance Procedure<sup>9</sup>. This is publicly available at <https://rsb.org/the-rsb-standard/grievances/>, and sets out the procedure for handling complaints made by third parties against economic operators, certification bodies and the RSB. In 2021, no grievances related to the RSB EU RED certification system were reported.

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<sup>7</sup> <https://rsb.org/certification/rsb-certificates/>

<sup>8</sup> <https://rsb.org/certification/call-for-public-comment-certification/>

<sup>9</sup> <https://rsb.org/wp-content/uploads/2020/06/RSB-PRO-65-001-vers-3.1-RSB-Grievance-Procedure.pdf>

## d) Stakeholder Involvement

The European Commission requires that voluntary schemes report on “*stakeholder involvement, particularly as regards the consultation of indigenous and local communities prior to decision making during the drafting and reviewing of the scheme as well as during audits and the response to their contributions*”

### Stakeholder involvement in Standard-Setting

An integral component of RSB’s approach to involve stakeholders is its governance system for the setting of the RSB standard. The decision-making mechanism based on consensus ensures that the voices of all relevant stakeholders, including indigenous and local communities, are heard. RSB was independently evaluated and found to be in compliance with the ISEAL Standard-Setting Code, which defines effective standard-setting processes and ensures the credibility of the standard.

The full procedure for standard development and standard revision is described in RSB-PRO-15-001<sup>10</sup>. Revisions are based on the feedback collected by the RSB Secretariat among operators, Certification Bodies, the RSB Accreditation Body, the RSB Membership and other key stakeholders. The RSB Secretariat initiates the revision process by issuing an updated draft of the standard/procedure of concern. Standards dealing with sustainability aspects undergo a public consultation process followed by several rounds of member consultation before final approval by the RSB Assembly of Delegates.

The RSB is a membership organisation in which members are organised into five Chambers that elect the governing body of the organisation – the RSB Assembly of Delegates. The RSB Assembly is the highest decision-making body of the RSB and approves modifications to the standard. Each RSB Chamber elects up to three Delegates, thus giving each chamber the same weight and influence in decision making.

Membership Chambers represent different sectors of business, civil society, trade unions, government, academia and multi-lateral organisations. The chambers elect representatives to the Assembly of Delegates and Board of Directors.

#### Business Chambers

1. Growers & Producers
2. End-Users, Blenders & Investors

#### Civil Society Chambers

3. Social Stakeholders
4. Environmental Stakeholders

#### Government and research Chambers

5. Government, multi-lateral organisations, and academia

<sup>10</sup> <https://rsb.org/wp-content/uploads/2020/06/RSB-PRO-15-001-vers-3.2-RSB-Procedure-for-Development-Modification-of-RSB-Standards.pdf>





Decisions on standards and related policies are taken by consensus. Therefore, all chambers have the same weight in the decision-making process.

RSB employs a variety of methods to engage with its stakeholders, including in-person meetings, regional meetings, webinars and conference calls.

### Standard Development activities in 2022:

In 2020, the RSB set up an RSB General Standards Working Group (GSWG) and invited experts from the RSB Membership as well as external members to join the group to work on technical aspects of the RSB Standard. In 2022, the GSWG held meetings on the following topics:

- 1) Development of the *RSB Standard Amendment for Woody Biomass*, which aims to define specific practices for sourcing woody feedstock to address particular risks and to ensure that only those feedstocks that are sustainably produced and achieve significant emission reductions compared to the fossil reference are certified in the RSB system;
- 2) Flexible attribution under the RSB Standard for Advanced Fuels;
- 3) Revision of the RSB Principles and Criteria – the overarching sustainability requirements of RSB standards;
- 4) Development of the new RSB Impact Alliance – an introduction and discussion.

### Stakeholder Involvement in Assurance

Meaningful and comprehensive engagement of interested or affected stakeholders is also an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. An important component of the RSB Standard, Principle 2 “Planning, Monitoring and Continuous Improvement”, requires operators to conduct a gender sensitive stakeholder consultation. Free, Prior & Informed Consent (FPIC) provides the process conditions for any stakeholder engagement while consensus is the decision-making tool to be applied in all cases. The RSB Standard requires operators to invite all relevant stakeholders including all locally-affected stakeholders, local leaders, representatives of community and indigenous peoples’ groups, to participate in a meaningful

consultative process. Special attention should be given to ensure that women, youth, elders, indigenous and vulnerable people can participate meaningfully in meetings and negotiations. In addition to the consultation by the operator, Certification Bodies carry out a stakeholder consultation before going on-site. CBs are required to make sure that stakeholders have the opportunity to present their comments to the auditors in the local language and under the terms of confidentiality. Information and comments given by consulted stakeholders are investigated, evaluated and verified objectively and meaningfully. An example of stakeholder involvement in the assurance process can be found online.<sup>11</sup>

## e) Robustness

The European Commission requires that voluntary schemes report on the “*overall robustness of the scheme, particularly in light of rules on accreditation, qualification and independence of auditors and relevant scheme bodies*”.

The Certification Bodies’ compliance with the RSB requirements regarding personnel competence and independence is overseen by Accreditation Services International (ASI) as part of the general accreditation assessment against the RSB procedure *Requirements for CBs and Auditors*. Every certification body certifying against the RSB standard is required to hold a valid accreditation issued by the RSB Accreditation Body.

RSB requires Certification Bodies to implement their audit programme in compliance with the international standard *ISO 19011*, which provides a robust framework for ensuring adequate auditor competence. In addition, the RSB Procedure *Requirements for CBs and Auditors* sets detailed requirements for the competence of auditors, including their academic background, work experience and training. CBs are required to differentiate between the scopes of agriculture/forestry, industrial processes and trade when evaluating auditors. Furthermore, CBs are responsible for ensuring continuous training as well as organising regular auditors’ exchanges of experience. In addition, RSB’s Assurance System requires Certification Bodies to comply with international standard *ISO 17065* to ensure that they operate in a competent, consistent and impartial manner.

The qualification of auditors and the CB’s system to recognise auditors is assessed by the accreditation body during the head office assessments as well as during the regular witness audits.

In every witness assessment, ASI assessors evaluate the CB auditors against 16 indicators of competence and in every head office assessment, ASI assessors evaluate the CB against 11 indicators of performance. The ASI Annual Report 2022 states that the results for auditor competence in the RSB program ranges between 2,4 and 3,0 on a scale from 0 to 3 and RSB recognised CBs achieve a performance ranging between B and C on a scale of A to E.

In 2022, the RSB Secretariat offered the following training modules for auditors of the certification bodies and the accreditation body, all training modules are offered for free and are web-based to ensure a high participation of auditors:

- Module 1: Introduction to the RSB
- Module 2: RSB Certification process
- Module 3: Chain of Custody
- Module 4: Advanced Fuels

<sup>11</sup> [http://rsb.org/wp-content/uploads/2017/03/RSB\\_RPT\\_Agrojibito\\_011216\\_PublicSummary-1.pdf](http://rsb.org/wp-content/uploads/2017/03/RSB_RPT_Agrojibito_011216_PublicSummary-1.pdf)

- Module 5: Advanced Products
- Module 6: RSB ICAO CORSIA
- Module 7: Greenhouse Gas emissions
- Module 8: Procedure for Certification Bodies and Auditors
- Module 9: RSB Principles & Criteria
- Module 10: RSB Japan FIT
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The RSB Secretariat maintains a registry of all active auditors and their participation in RSB training modules. On a sample basis, the training status of auditors is checked, and training gaps notified to the CB and the accreditation body ASI.

In 2022, the RSB requested all active auditors to participate in an online test in order to understand the level of knowledge amongst the RSB auditors and to identify areas that need further guidance.<sup>12</sup> Based on the results of the Auditor Test, a calibration call was organised to work through areas in which knowledge gaps were identified.

Calibration calls with the two Certification Body Program Managers were held monthly in 2022, giving CBPMs the opportunity to discuss any audit issues as well as to update CBPMs on future RSB standards changes.

## f) Market Updates

*The European Commission requires that voluntary schemes report on “market updates of the scheme, the amount of feedstocks and biofuels certified, by country of origin and type, the number of participants”*

The RSB reports annually to the EU Commission as a prerequisite of RSB’s continued recognition as a voluntary scheme under the EU RED. The annual report includes data on RSB-certified feedstock and fuel. Collecting and processing these data is part of the RSB Monitoring & Evaluation (M&E) System.

The RSB monitors its performance by analysing data collected among its certified operators and other stakeholders through a set of indicators, which cover production data as well as environmental, social and economic issues and the context in which operators work.

RSB’s M&E System collects actual data on volumes of fuel and feedstock produced, hectares covered and workers in the scope of certification but also data about where non-conformities have been issued. This information helps RSB to draw conclusions about the areas of change and the impacts of the RSB certification system. The results of this M&E reporting period feeds into the organisational learning process and helps RSB to analyse our evolving footprint in greater depth<sup>13</sup>.

The data points required for the RSB M&E System are collected through the ongoing certification processes. This data collection method allows the RSB Secretariat to continuously collect actual and third party verified data. In addition, the RSB requires operators to report production volumes directly to the RSB. The RSB Secretariat continuously compares data received through certification process with the data directly reported by the operators in order to evaluate the data for plausibility and consistency.

<sup>12</sup> [https://www.surveymonkey.de/r/RSB\\_Annual\\_Test\\_2020](https://www.surveymonkey.de/r/RSB_Annual_Test_2020)

<sup>13</sup> <https://rsb.org/wp-content/uploads/2021/06/21-05-31-RSB-Monitoring-Evaluation-System-2020-Designed-Version.pdf>

Aggregated data as of 31 December 2022:

- **Number of certificates – Year 2022**

RSB certificates (all scopes)	58
Sites covered	432
Countries	40
Area covered (cultivated area in hectares)	36,177

- **Production data**

	2017 report	2018 report	2019 report	2020 report	2021 report	2022 report
Products RSB certified in MT (RSB Global + RSB EU RED)	305,046.24	368,776.13	432,619.70	274,303.23	262,642.703	289,265.00
Feedstock RSB certified in MT (RSB EU RED)	121,908.15	597,259.42	576,706.31	17,413.82	16,654.00	49,300.45
Product RSB certified in MT (RSB EU RED)	26,257.75	52,446.80	66,110.42	40,378.00	38,066.00	0

Detailed information on the countries of origin and biofuel/feedstock types produced (excludes traders) is included in the annex of this document and available on request.

The data are reported to the RSB bi-annually by the participating operators. The RSB Secretariat continuously validates the data reported by the operators by comparing it to the data that is collected through the certification bodies during the annual surveillance audits.

## g) Traceability

The European Commission requires that voluntary schemes report on *“the ease and effectiveness of implementing a system that tracks the proofs of conformity with the sustainability criteria that the scheme gives to its members, such a system intended to serve as a means of preventing fraudulent activity with a view, in particular, to the detection, treatment and follow-up of suspected fraud and other irregularities and where appropriate, number of cases of fraud or irregularities detected”*

All RSB certified operators acquiring, handling or forwarding RSB EU RED certified material are required to implement an effective and transparent chain of custody tracking system in line with the RSB EU RED Procedure for Traceability<sup>14</sup> which ensures that RSB certified material is tracked from the farm (primary biomass) or from the point of origin (waste/residues) to the final user.

Fraudulent claims or irregularities are detected through continuous surveillance by the Certification Bodies, which are required to audit a representative sample of all sites listed in the scope of certification as well as a representative sample of RSB compliance claims made by the operator. In addition, RSB has a grievance procedure for complaints against the standards system, which is publicly available, and can be found online as well<sup>1516</sup>. Cases of misuse, misrepresentation or fraudulent claims are non-conformities that lead to the suspension of the certificate (see section b). In addition, the accreditation body is required to include a representative sample of RSB compliance claims in the accreditation evaluation (see section (i) on Accreditation for Certification Bodies). The representative sample of RSB compliance claims is based on the risk class of the certification body and varies between 10% and 25% of all compliance claims made by the operators certified by the certification body.

## h) Requirements for Accreditation Bodies

The European Commission requires that voluntary schemes report on *“options for entities to be authorised to recognise and monitor certification bodies”*.

The RSB has implemented a third-party oversight mechanism by which an independent entity (i.e. Accreditation Body) is responsible for recognising and monitoring Certification Bodies. Recognition of the Accreditation Body is based on the requirements of *ISO/IEC 17011:2004* as well as the RSB Procedure *RSB-PRO-75-001 General requirements for Accreditation Bodies*. RSB requires accreditation bodies to conduct stakeholder consultations as part of its accreditation evaluation by which a representative range of stakeholders is consulted and stakeholder comments are investigated, evaluated and verified objectively and meaningfully.

In 2022, RSB recognised Accreditation Services International (ASI)<sup>17</sup> as the sole provider of accreditation services to the RSB certification system. ASI is also the provider of accreditation services to other certification programs such as the Forest Stewardship Council (FSC) and the Roundtable on Sustainable Palm Oil (RSPO). As an international organisation with a focus on environmental and social sustainability, ASI's expertise ensures that audits towards the RSB system are conducted with competence and consistency, regardless of where around the world they take place.

<sup>14</sup> <https://rsb.org/wp-content/uploads/2020/06/RSB-PRO-11-001-20-001-v.3.7-RSB-EU-RED-Procedure-for-Traceability.pdf>

<sup>15</sup> <https://rsb.org/wp-content/uploads/2020/06/RSB-PRO-65-001-vers-3.1-RSB-Grievance-Procedure.pdf>

<sup>16</sup> <https://rsb.org/the-rsb-standard/grievances/>

<sup>17</sup> <https://www.asi-assurance.org/s/>

In addition to the accreditation process carried out by ASI, the RSB Secretariat conducts a system review regularly to ensure that the process is in line with the RSB requirements and to detect any risks related to the assurance process.

## i) Accreditation of Certification Bodies

The European Commission requires that voluntary schemes report on “*criteria for the recognition or accreditation of certification bodies*”.

The accreditation of Certification Bodies is based on the RSB Procedure *Requirements for CBs and Auditors*. This procedure describes the requirements for Certification Bodies to become accredited to perform audits, issue RSB certificates, and ensure the continuous monitoring of RSB Participating Operators. As of 2022, the requirements include inter alia:

- Ensuring compliance with international standards *ISO/IEC 17065*, *ISO 19011* and *ISO/IEC 14064-3*.
- Developing, documenting and implementing a risk management system.
- Implementing a grievance mechanism.
- Ensuring auditor qualification and implementing an appropriate knowledge management system.
- Ensuring adequate evaluation of operators, procedures to issue certificates as well as dealing with non-compliances.

The accreditation process follows the *RSB PRO-75-001 General requirements for accreditation bodies*<sup>18</sup>. The accreditation body evaluates the certification body’s competence, including its overall systems and procedures, its staffing levels, competence and experience, and its reporting ability to provide certification services under the RSB certification system.

As of 31st December 2022, two Certification Bodies were accredited in the RSB system with SGS Tecnos joining the RSB and Control Union Certifications B.V being withdrawn.

CB	Location	Geographic Scope	Technical scope	2022 Assesement	Accreditation date	No of operators (all scopes)
Control Union Certifications B.V	The Netherlands	Worldwide	Full scope	1 Head Office was cancelled + 1 witness was done	Accredited 18/02/2015; re-accredited on 17.02.2020; withdrawn by RSB on 30.08.2022	13

<sup>18</sup> <https://rsb.org/wp-content/uploads/2020/06/RSB-PRO-75-001-vers.3.1-General-requirements-for-accreditation-bodies.pdf>

SCS Global Services	United States	Worldwide	Full scope	1 Head Office + 1 witness assessment were done	Accredited 04.11.2014; re-accredited on 30.05.2021	17
SGS Tecnos	Spain	Worldwide	Full scope	1 Head Office + 1 witness assessment were done	Accredited 17/09/2022	3

## j) Monitoring of Certification Bodies

The European Commission requires that voluntary schemes report on the “rules on how the monitoring of the certification bodies is to be conducted”

Certification Bodies are monitored continuously by ASI surveillance activities that are performed in accordance with the *ASI Procedure for Surveillance and Sampling*.<sup>19</sup> At least once per year, ASI conducts a performance review for each certification body and adjusts the annual assessment and sampling plan based on its results. ASI’s default annual assessment rate of each accredited Certification Body specifies:

- One office assessment of the accredited head office; and
- Office assessments at 1/5 of all affiliate offices; and
- One representative witness assessment of a certification activity; and
- A representative number of witness assessments. The sample is defined based on the risk class of the Certification Body and varies between 3% for low risk and 9% for high risk.

Samples are selected based on level of risk and include risk factors such as countries that ASI has identified as high-risk areas, or complaints that have been raised.

Specifics of the accreditation activities for 2022 are documented in the *ASI Update on the RSB Accreditation Program, 2022 Annual Summary*, including assessments that were conducted, contents of the assessments and findings.

In total, 24 findings were raised, of which 12 are non-conformities that have to be closed by the Certification Bodies.

Normative document	Major NC	Minor NC	Total
RSB-PRO-70-001 v.3.6	3	19	22
ISO/IEC 17065:2012	0	1	1
Total	3	21	24

<sup>19</sup> <https://www.asi-assurance.org/sfc/servlet.shepherd/version/download/0681H000004eM00QAE>

This is an increase compared with the previous year, likely due to the recognition of a new CB, causing more NCs on their first audit due to unfamiliarity with the system and requirements.

The ASI 2022 Annual Summary also documents the overall performance and risk as assessed by ASI, as well as the competence of the auditors active in the RSB system.

## k) Promotion of Best Practice

The European Commission requires that voluntary schemes report on “*possibilities to facilitate or improve promotion of best practice*”

### General considerations

One of the core objectives of the RSB is to promote the production of high-quality sustainable biofuels throughout the world while protecting soils and enhancing their fertility, as well as minimising environmental pollution and the use of non-renewable resources. In order to achieve this goal, the RSB provides a global platform for a multi-stakeholder dialogue and consensus building. Internal and external RSB stakeholders engage in discussions on best practices for the production of sustainable biofuels through regular conference calls, regional technical working groups and global conferences. RSB members represent a wide range of global experts that allow the RSB to continuously identify and incorporate best practice into RSB’s standards.

### ISEAL membership

In addition, best practice for sustainability standards are promoted through the ISEAL Alliance that builds understanding of good practice for the standards system and sets internationally applicable good practice guidance for the implementation of credible standards systems:

- **Assurance Code** provides guidance for high quality assurance that supports sustainability and improves the effectiveness of different verification and certification models
- **Standard-Setting Code** defines effective standard-setting processes, thereby increasing the credibility of the resulting standard
- **Impacts Code** helps standards systems to better understand the sustainability results of their work, as well as the effectiveness of their programs

RSB is a full member of the ISEAL Alliance and fully complies with all three codes of good practice.

### Examples of best practices in 2022:

#### **Auditor Test**

The RSB Secretariat developed a system to test the knowledge of RSB auditors in the technical areas that they are active in. This ensures that auditors have up-to-date knowledge of RSB EU RED and other requirements. Based on an evaluation of the test results, the RSB Secretariat organises (remote) calibration workshops for all active auditors to further train and provide guidance in areas where gaps



are identified, this is coupled with regular meetings with Program Managers at the CBs to gauge any issues and answer any queries brought to them by their auditors.

### **System review**

As part of the RSB Risk Management System, the RSB Secretariat regularly reviews the RSB Assurance System to ensure its continuing integrity, adequacy, and effectiveness:

The review includes:

- An internal system audit of the assurance system including the activities and results of the accreditation body.
- The systematic review of certification audit reports. As a minimum the square root of all audit reports is reviewed.
- Review of certified operators' feedback to systematic surveys.
- Onsite witness audits (in addition to the audits carried out by the RSB Accreditation Body), if possible.

The RSB Secretariat uses the results of the review to revise the RSB assurance programme.