



RSB®

Roundtable on
Sustainable Biomaterials

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REPORT TO THE EU COMMISSION

on RSB certification: Assurance, Stakeholder Engagement and Market Updates

Roundtable on Sustainable Biomaterials

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Introduction

The [Roundtable on Sustainable Biomaterials](#) (RSB) is an independent and global multi-stakeholder certification scheme, which works to promote the transition to a biobased economy, through the certification of sustainability of biofuels supply chains, as well as other biomaterials.

Economic operators subject to the EU Renewable Energy Directive 2018/2001 (RED II) Producers and processors and their supply chains can become certified to the RSB Standard. On the 12 April 2022 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.

Besides the certification of compliance with RED II, RSB system also defines a series of voluntary standards applicable across a variety of sectors and stakeholders who wish to demonstrate their operations are aligned with the highest level of social and environmental commitments. For more information about RSB voluntary certification schemes see [here](#).

RSB is also a membership based organisation, where our membership brings together stakeholders from a variety of backgrounds (social, economic and environmental) and perspectives together, through the dialogue platforms hosted under our membership. RSB acts as a think tank in the bioeconomy sector, developing research and promoting partnerships that bring the industries closer to sustainable practices.

Among the numerous environmental and social organisations that support RSB – through the membership and beyond – are WWF, Canopy, The National Wildlife Federation, Wild Asia, IUCN, Solidaridad, among many other trusted organisations. For transparency, see [here](#) a complete list of RSB's environmental members.

The RSB is a full member of the ISEAL Alliance which sets the ISEAL's Code of Good Practice for Sustainability Systems 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.

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. This report is based on the activities implemented under the RSB certification scheme in the time period between January and December 2024.

Audit impartiality

The European Commission (EC) requires that voluntary schemes recognised for the certification of compliance with RED II 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 that are used throughout the auditing and certification process to ensure both the efficiency and effectiveness of the certification process, as well as to protect the integrity and robustness of the RSB certification system.

Economic operators which are certified for RED II compliance under the RSB system, are required to conduct due diligence assessments to identify any potential issues linked to the [RSB Principles & Criteria](#), which define the fundamental social and environmental values in the RSB, constituting the backbone of RSB certification. This due diligence exercise conducted by economic operators who are applicants to the RSB certification system is based on the RSB Screening Tool¹. This tool helps operators and auditors to better understand the sustainability and social responsibility related risks relevant to their operations and guides them to areas that need more focus.

The RSB Assurance System, as laid out in the RSB Procedure *Requirements for Certification Bodies and Auditors*² [RSB-PRO-70-001], 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 procedure³ which provides a risk evaluation tool⁴ 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. The RSB Procedure *Requirements for Certification Bodies and Auditors* [RSB-PRO-70] includes a robust system for assessing if and when desk-based audits can be conducted. 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 certification requirements. CBs are independent organisations accredited to carry out certification activities against the RSB system.

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.

¹ https://rsb.org/wp-content/uploads/2020/06/21-08-18-RSB-Screening-Tool-_v3.0.xlsx

² <https://rsb.org/wp-content/uploads/2020/06/RSB-PRO-70-001-v.4.1-Procedure-CBs-and-Auditors.pdf>

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

⁴ https://rsb.org/wp-content/uploads/2020/08/21-05-27-RSB-Risk-Assessment-Tool_v4.0.xlsx

The RSB Assurance System is fully in line with the ISEAL 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 practice⁵.

An important element in the context of the risk-based approach is the inclusion of stakeholder engagement processes, that bring transparency to the certification process and that enable an opportunity for stakeholders to raise concerns about applicant organisations. This stakeholder engagement process is required as part of the RSB certification process and includes the following steps for every new certification application:

- A public global stakeholder consultation is conducted (through a dedicated mailing list and publication on the RSB website), open for stakeholders to raise feedback about the applicant organisation.
- An initial due diligence assessment is conducted by the RSB Secretariat, to identify potential high level risks that would require further assessment/mitigation;
- Auditors conduct stakeholder outreach prior to the audit, as part of their process to identify potential risks associated to the company subject to verification;
- Need for operator's stakeholder engagement, as part of their internal processes, to ensure their alignment with RSB's social and environmental commitments, as defined in the RSB Principles & Criteria.

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 RSB certification requirements are recorded by the auditor as 'non-compliances' during the certification process. 'Non-compliances' are graded in the RSB system in two categories: '*minor*' non-compliance and '*major*' non-compliance.

Situations that are defined as 'major non-compliances' are described in the RSB Procedure *Requirements for Certification Bodies and Auditors [RSB-PRO-70-001]* 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).
- Systematic problems with mass balance or GHG data reported, for example incorrect documentation is identified in more than 10% of the claims included in the representative sample.
- Management systems implemented by the PO which are not applied comprehensively and consistently to all units in the certification scope of the PO.

⁵ <https://www.isealliance.org/defining-credible-practice/iseal-code-good-practice>

- 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.
- 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.

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 monitors, evaluated and keeps record of areas of non-compliance by operators, 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 2024 in the different technical areas of the RSB EU RED standard in percentage relative to the total number of non-compliances raised:

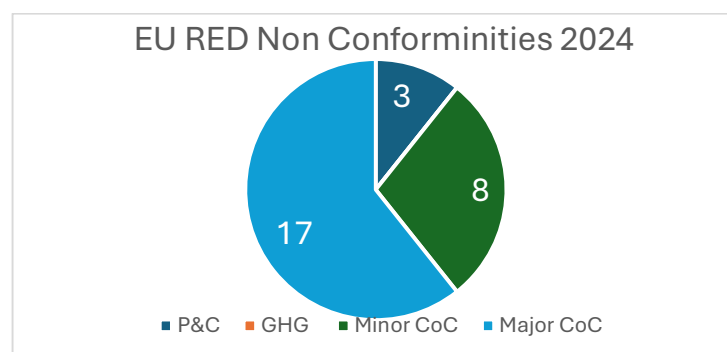


Figure 1: Number & types of Non-Conformity raised under RSB EU RED in 2024 Total = 28

Figure 1 shows that all of the issues raised related to sustainability and traceability in 2024.

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 an improve in the maturity of the system as the number of non-compliances have decreased, from 34 in 2023 to 28 in 2024. It should be noted that a strong focus of the audit remains being ensuring the traceability and robustness of the Chain of Custody systems, remains the Chain of Custody system, it's the most scrutinized part of an audit and has the highest volume of documentation generated by Participant Operators verified by third party auditors.

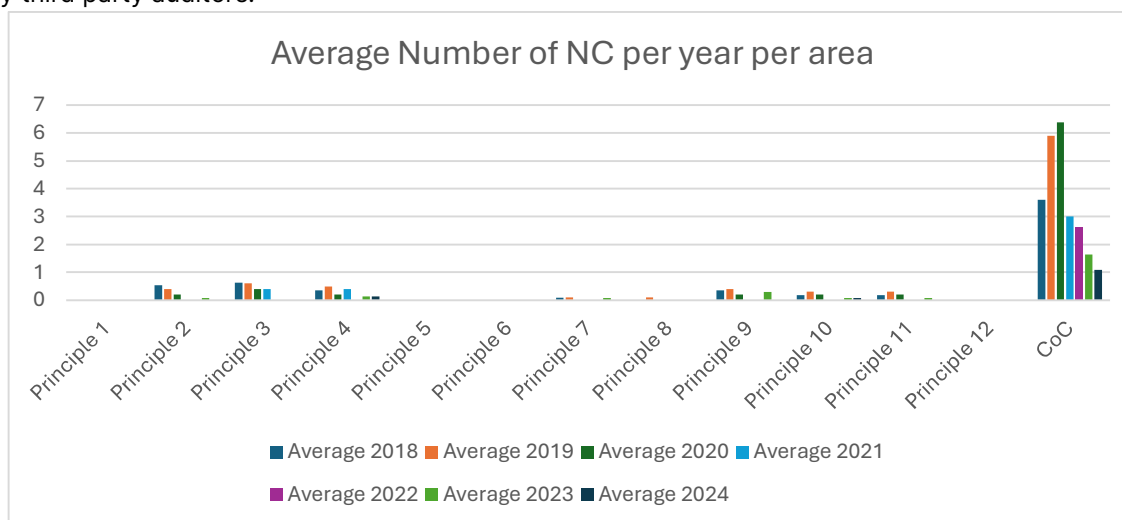


Figure 2: Average number of non-conformities per RSB EU RED EO, by area and year.

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 globally. 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 provides explanations of the RSB standard and the certification process to help operators to understand better how to implement the RSB requirements.⁶

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.

⁶ <http://rsb.org/certification/>

Therefore, a list of certified operators, all certificates (valid, expired, terminated) as well as Audit Summary Reports are available online.⁷

The content of the Public Audit Summaries is defined in the RSB Procedure *Requirements for Certification Bodies and Auditors* [RSB-PRO-70-001] and includes, among other:

- 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 third party RSB oversight body ([SAJOMA Climate](#)), including main contact information and a description of the main services and functions that SAJOMA undertakes in the RSB system as to contribute to the system integrity and credibility.

As RSB's Oversight Body, Sajoma helps to ensure that CB activities are carried out to the highest possible standard and that any areas of concern are brought to the attention of the RSB Secretariat.

Sajoma fulfils a range of critical functions from a system integrity standpoint:

- **Increasing confidence in assurance:** Sajoma increases stakeholder trust in RSB's certification system by providing thorough, unbiased assessments of a sample of certification reports* of each CB and their performance.
- **Strengthening accreditation control:** By broadening the scope of certification activity oversight by increasing the amount of assessed reports and the time and deep on the assessment, Sajoma complements ISO-conforming accreditation and ensures deeper control over compliance.
- **Independent review and risk assessment:** Sajoma independently reviews audit reports, checks for discrepancies, and identifies risks within assurance processes. These efforts reduce vulnerabilities in the certification system.
- **Promoting best practices:** Sajoma works with CBs to improve audit quality, accuracy of reporting, and alignment with international standards.

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

- **Knowledge sharing and interpretation:** Sajoma fosters collaboration between Certification Bodies, offering guidance on interpreting standards and facilitating workshops and calibration meetings to ensure consistency.

As RSB's *technical* Oversight Body, Sajoma's unique contributions and responsibilities under RSB include:

- **Developing technical checklists:** Sajoma creates and maintains comprehensive checklists for assessing certification reports, ensuring consistent evaluations across CBs.
- **Conducting witness audits:** Sajoma conducts at least one audit per Certification Body annually, with reports detailing outcomes and recommendations. Witness audits verify that CBs understand and implement RSB standards properly.
- **Regular risk-based sampling:** Sajoma selects and reviews audit samples based on risk criteria, addressing areas of concern and aligning oversight with EU RED and ICAO CORSIA requirements.
- **Quarterly and annual reporting:** Sajoma provides regular activity reports to RSB, highlighting CB performances, areas of concern, and recommendations for improvement.
- **Technical support:** Sajoma answers technical queries on GHG calculations and supports standard development processes.
- **CB onboarding and training:** Sajoma ensures new CBs meet RSB's rigorous requirements through thorough onboarding, training, and auditor verification.

This is transformative for assurance systems – enhancing credibility, fostering continuous learning, mitigating risk, and strengthening transparency.

In this role, Sajoma reassures stakeholders of certification reliability, while their collaborative role promotes ongoing improvement among CBs. Furthermore, their proactive identification of assurance risks ensures RSB's certification system remains robust and adaptable, while their detailed reporting and open communication enhance stakeholder trust.

In line with RSB's commitment to transparency and stakeholder engagement, all certification applications are subject to a public consultation via the RSB website⁸. 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 2024, RSB continued to engage its stakeholders by providing timely and transparent updates on developments within the RSB system through a range of communication channels. These included invitations to webinars, announcements regarding new RSB members and certified operators, updates on the development and revision of standards, as well as information on strategic partnerships. In addition to its regular newsletter, RSB made active use of its social media platforms to disseminate relevant information and maintain ongoing engagement with its global network.

Moreover, RSB facilitated direct stakeholder interaction through a series of events held throughout 2024. These comprised 11 virtual events, 1 hybrid event, and 5 in-person events delivered across four continents, reflecting RSB's commitment to accessibility, inclusivity, and international outreach.

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

These events served as valuable platforms for dialogue, knowledge exchange, and collaboration among stakeholders from a wide range of sectors and regions.

In 2024, 30 participant operators submitted applications for RSB certification, all of which were subject to public consultation in accordance with RSB's commitment to transparency and stakeholder engagement. As a result, 30 public consultations for the certification of RSB operators were carried out during the year.

RSB sets out the procedure for dealing with complaints in the RSB Grievance Procedure⁹. 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 2024, no grievances related to the RSB EU RED certification system were reported, although one grievance was reported related to the renewal of an RSB-certified facility, which was addressed by the stakeholders (Certification Body, Participant Operators and Community).

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

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 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 the RSB Procedure RSB-Procedure-for-Development-Modification-of-RSB-Standards [RSB-PRO-15-001]¹⁰. 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-based organisation in which members are organised into five chambers that elect the governing body of the organisation – the RSB Assembly of Delegates. These five chambers represent organisations from a wide variety of backgrounds and perspectives, including industrial partners, research organisations, environmental and social NGOs, and industry associations, among other. 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

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

Figure 3 below illustrates RSB Stakeholder engagement overview.

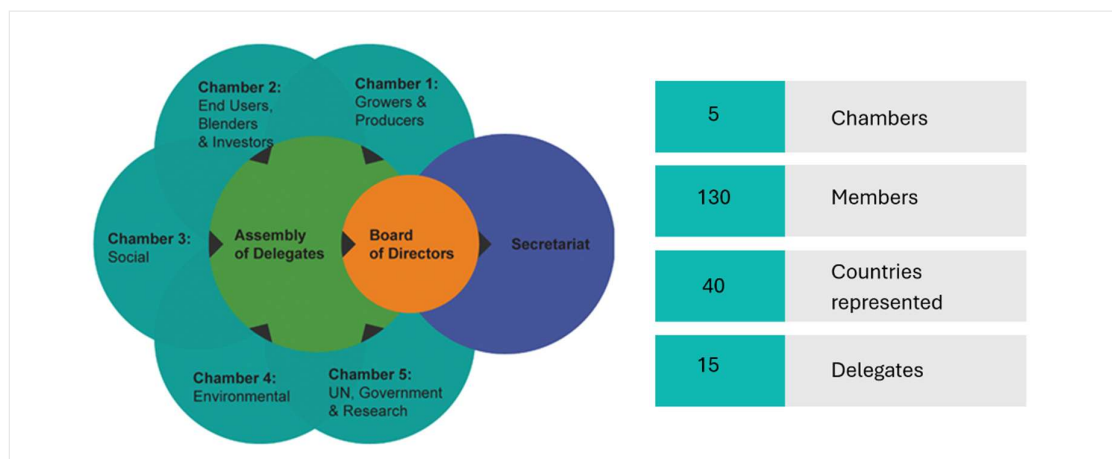


Figure 3: RSB Stakeholder engagement overview.

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 2024:

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 2024, the GSWG held meetings on several topics.

From all the topics and discussions held in 2024 (which can be found in the [RSB Standards Workplan 2025](#)) we highlight the revision of RSB EU RED Certification Scheme, related to the Co-Processing and RFNBO/RCF scopes, as well as RED III updates starting in Q4 2024.

Such review was fruitful, culminating in the extension of RSB EU RED Scope for Co-Processing and the positive technical assessment of the updated documentation for RED III, encompassing agricultural biomass, and wastes and residues certification.

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 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.¹¹

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 RSB is based on a system of third-party auditing of Economic Operators (termed “Participating Operators” under the RSB system). Auditing activities conducted by the independent Certification Bodies accredited to conduct RSB certifications are supervised by an independent Oversight Body, SAJOMA ([SAJOMA Climate Technical Consulting](#)). SAJOMA, as a third-party Oversight Body, assures the quality and integrity of the RSB certification system, by conducting continuous monitoring and evaluation of CB performance, with the objective of identifying and correcting any potential issues in the implementation of RSB certification. On a quarterly and annual basis, the Oversight Body reports its findings to the RSB Secretariat, and action is taken if and when needed as to ensure the quality of implementation of RSB certification. SAJOMA, as the third-party Oversight Body in the RSB system is a key element to ensure the credibility and integrity of our certification scheme.

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 oversight body during the head office assessments as well as during the regular witness audits.

In 2024, the RSB Secretariat offered the following training modules for auditors of the Certification Bodies and the oversight body, all training modules 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

¹¹ https://rsb.org/wp-content/uploads/2024/02/RSB_FS_Agri_RPT_PublicEvalReport_V18-0_062222_020724.pdf

- Module 4: Advanced Fuels
- 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

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 Oversight Body.

In 2024, the RSB requested all active auditors to participate in a test in order to understand the level of knowledge amongst the RSB auditors and to identify areas that need further guidance. Calibration calls with the two Certification Body Program Managers were held monthly in 2024, giving CB Program Managers the opportunity to discuss any questions or audit issues, as well as to update Program Managers on future RSB standards changes and updates.

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 depth¹².

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.

Aggregated data as of 31 December 2024:

Number of certificates – Year 2024

RSB certificates (all scopes)	72
Sites covered	1,112
Countries	29
Area covered (cultivated area in hectares)	24,944

¹² <https://rsb.org/wp-content/uploads/2023/10/RSB-Impact-Report-2022-WEB.pdf>

Production data

	Products RSB certified in MT (RSB Global + RSB EU RED)	Feedstock RSB certified in MT (RSB EU RED)	Product RSB certified in MT (RSB EU RED)
2017	305,046.24	121,908.15	26,257.75
2018	368,776.13	597,259.42	52,446.80
2019	432,619.70	576,706.31	66,110.42
2020	274,303.23	17,413.82	40,378.00
2021	262,642.70	16,654.00	38,066.00
2022	289,265.00	49,300.45	0
2023	227,755.00	28,524.00	0
2024	384,127.17	28,019.90	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.

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 Traceability¹³ 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^{14,15}. 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.

¹³ <https://rsb.org/wp-content/uploads/2020/06/RSB-PRO-11-001-20-001-v.3.8-RSB-EU-RED-Traceability.pdf>

¹⁴ <https://rsb.org/wp-content/uploads/2020/06/RSB-PRO-65-001-vers-3.1-RSB-Grievance-Procedure.pdf>

¹⁵ <https://rsb.org/the-rsb-standard/grievances/>

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 2023, RSB recognised Accreditation Services International (ASI)¹⁶ as the sole provider of accreditation services to the RSB certification system. The contract with ASI was terminated at the end of 2023 and RSB transitioned to a new accreditation and oversight approach with SAJOMA.

As RSB's Oversight Body, SAJOMA helps to ensure that CB activities are carried out to the highest possible standard and that any areas of concern are brought to the attention of the RSB Secretariat.

SAJOMA fulfils a range of critical functions from a system integrity standpoint:

- **Increasing confidence in assurance:** SAJOMA increases stakeholder trust in RSB's certification system by providing thorough, unbiased assessments of a sample of certification reports of each CB and their performance.
- **Strengthening accreditation control:** By broadening the scope of certification activity oversight by increasing the amount of assessed reports and the time and depth on the assessment, SAJOMA complements ISO-conforming accreditation and ensures deeper control over compliance.
- **Independent review and risk assessment:** SAJOMA independently reviews audit reports, checks for discrepancies, and identifies risks within assurance processes. These efforts reduce vulnerabilities in the certification system.
- **Promoting best practices:** SAJOMA works with CBs to improve audit quality, accuracy of reporting, and alignment with international standards.
- **Knowledge sharing and interpretation:** SAJOMA fosters collaboration between Certification Bodies, offering guidance on interpreting standards and facilitating workshops and calibration meetings to ensure consistency.

In addition to the oversight process carried out by SAJOMA, 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. This involves reviewing audit reports for inconsistencies and attending witness audits on an annual basis.

¹⁶<https://www.asi-assurance.org/s/>

Oversight 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 2024, the requirements include inter alia:

- Ensuring compliance with international standards ISO/IEC 17065, ISO 19011 and ISO/IEC 14064-3 and to ISO 14065 (or justified equivalent) if performing actual value GHG audits.
- 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.
- Certification Bodies and auditors shall be independent from the Participating Operators.
- Certification Bodies participating in the EU RED scheme shall cooperate with the EU Commission and the competent authorities of the Member States making available all information needed to fulfil their tasks.

The accreditation process follows the RSB Procedure *General requirements for accreditation bodies* [RSB PRO-75-001]¹⁷. The Oversight 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.

In 2024, two Certification Bodies were accredited in the RSB system with SGS Tecnos and SCS Global Services.

CB	Location	Geographic Scope	Technical scope	Accreditation date	Number of Certificates (all scopes)
SCS Global Services	United States	Worldwide	Full scope	Re-accredited on 30/05/2021	49
SGS Tecnos	Spain	Worldwide	Full scope	Accredited 17/09/2022	6

¹⁷ <https://rsb.org/wp-content/uploads/2020/06/RSB-PRO-75-001-vers.3.1-General-requirements-for-accreditation-bodies.pdf>

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”*.

In Q4 of 2024, the RSB developed new Oversight Body requirements in the form of the RSB-PRO-85-001 - Oversight Body Requirements and Responsibilities¹⁸. This document outlined the new role that an RSB Oversight Body would play including but not limited to:

- Assessment, evaluation and resolving of disputes, questions or clarifications submitted by RSB participating operators (POs) and CBs.
- Maintaining a deep understanding of RSB certification system documents (e.g. standards, procedures), and hold specialist knowledge of areas of work relevant to the RSB scope (e.g. GHG calculation, biomass and industrial processing sustainability, EU RED, ICAO CORSIA).
- Creation and maintaining of an up-to-date a checklist to be used in the assessment of certification reports and audit documentation submitted by RSB CBs.
- Selection and assessment on a risk-based sample of the audit reports and audit evidences for each CB within the annual audit cycle – in line with EU RED and CORSIA regulatory requirements.
- Reporting of any CB non-conformities, observations and CB risk ratings.
- Selection and conduction of witness audits as a part of their role to ensure that CBs understand the RSB standards and can conduct audits in a professional and proper manner.

Certification Bodies are monitored continuously by SAJOMA surveillance activities and, at least once per year, SAJOMA conducts a performance review for each certification body and adjusts the annual assessment and sampling plan based on its results.

As RSB's *technical* Oversight Body, SAJOMA's unique contributions and responsibilities under RSB include:

- **Developing technical checklists:** SAJOMA creates and maintains comprehensive checklists for assessing certification reports, ensuring consistent evaluations across CBs.
- **Conducting witness audits:** SAJOMA conducts at least one audit per Certification Body annually, with reports detailing outcomes and recommendations. Witness audits verify that CBs understand and implement RSB standards properly.
- **Regular risk-based sampling:** SAJOMA selects and reviews audit samples based on risk criteria, addressing areas of concern and aligning oversight with EU RED and ICAO CORSIA requirements.
- **Quarterly and annual reporting:** SAJOMA provides regular activity reports to RSB, highlighting CB performances, areas of concern, and recommendations for improvement.

¹⁸ RSB-PRO-85-001 - Oversight Body Requirements and Responsibilities

- **Technical support:** SAJOMA answers technical queries on GHG calculations and supports standard development processes.
- **CB onboarding and training:** SAJOMA ensures new CBs meet RSB's rigorous requirements through thorough onboarding, training, and auditor verification.

In this role, SAJOMA reassures stakeholders of certification reliability, while their collaborative role promotes ongoing improvement among CBs. Furthermore, their proactive identification of assurance risks ensures RSB's certification system remains robust and adaptable, while their detailed reporting and open communication enhance stakeholder trust.

The integration of SAJOMA as RSB's *technical* Oversight Body exemplifies best practices in assurance, combining rigorous oversight with adaptive learning. This unique approach strengthens RSB's position as a leader in sustainability certification, ensuring its systems meet the highest standards of credibility, transparency, and technical excellence.

As RSB and SAJOMA's collaborative efforts grow, so too will our innovation and resilience in certification systems. Together, we are well-equipped to address emerging challenges, set new benchmarks for technical oversight, and further advance the sustainability goals that lie at the heart of our shared mission.

During 2024, the RSB continued its own internal oversight and monitoring activities on its Certification Bodies. Carrying out preliminary assessments on each audit report received and also conducting witness audits to observe how Certification Body auditors performed on audits.

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 focusing in:

- **Standard-setting:** defining effective standard-setting processes, thereby increasing the credibility of the resulting standard.
- **Assurance:** providing guidance for high quality assurance that supports sustainability and improves the effectiveness of different verification and certification models
- **Monitoring, evaluation, and learning:** for systems to understand how effective their strategies are measuring progress against its sustainability goals and to improve practices over time.
- **Claims:** for setting and managing trustworthy claims.

RSB is a full member of the ISEAL Alliance and fully complies with the ISEAL's Code of Good Practice for Sustainability Systems.

Examples of best practices in 2024:

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 regular meetings with Program Managers at the CBs to gauge any issues and answer any queries brought to them by their auditors.

Technical Oversight Body – SAJOMA

In 2024, RSB established an independent Oversight Body (OB), named SAJOMA, to enhance the credibility and integrity of its certification system. SAJOMA supports impartial and expert technical oversight by reviewing key elements of the RSB assurance system, including standard revisions,

methodologies, and tools. It serves as an external body of experts that ensures technical decisions are robust, transparent, and aligned with RSB's mission and stakeholder expectations.

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.
- Onsite witness audits (in addition to the audits carried out by the RSB Oversight Body), if possible.

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