

RSB – ROUNDTABLE ON SUSTAINABLE BIOMATERIALS

REPORT TO THE EU COMMISSION

on

Assurance

Stakeholder Involvement

Market Updates

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Report to the EU Commission

1 January 2019 – 31 December 2019

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 Directives 98/70/EC and 2009/28/EC of the European Parliament and of the Council. This report to the EU Commission is required under Directives 98/70/EC and 2009/28/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 Tool¹. 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*², 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 tool 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

¹ https://rsb.org/wp-content/uploads/2018/07/RSB-GUI-01-002-02_Screening-Tool.pdf

² <https://rsb.org/wp-content/uploads/2019/04/RSB-PRO-70-001-vers-3.5-Requirements-CBs-and-Auditors.pdf>

³ <https://rsb.org/wp-content/uploads/2017/02/RSB-PRO-60-001-vers-3.2-Procedure-for-Risk-Management.pdf>

are 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 practice⁴.

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 (2009/28/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.

⁴ <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 2019 in the different technical areas of the RSB EU RED standard in percentage relative to the total number of non-compliances raised:

Figure 1 shows that the majority of issues raised relate to chain of custody / traceability.

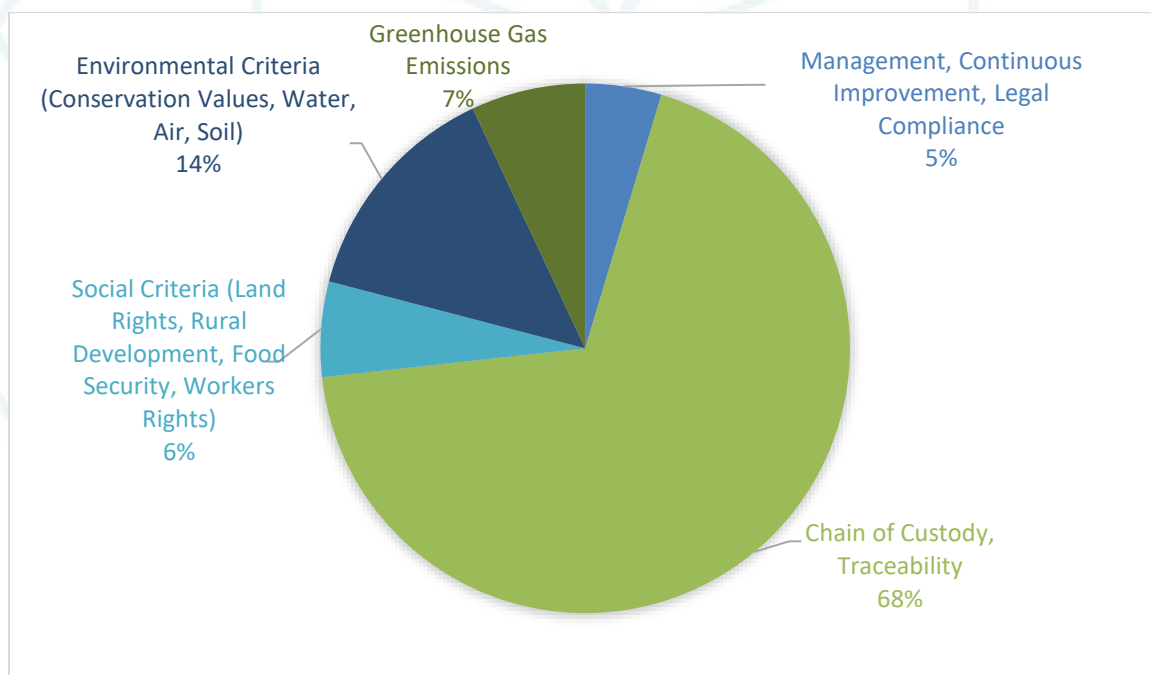


Figure 1: Types of Non-Conformity raised under RSB EU RED in 2019

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 technical area of the RSB EU RED Standard. The figure shows an increase in non-compliances raised in the chain of custody technical area. This is assumed to be a result of additional assurance measures that the RSB has

implemented over the last 12 months to increase audit quality in this area. For example, more detailed audit guidance was published, and traceability was highlighted to the accreditation body as a focus area.

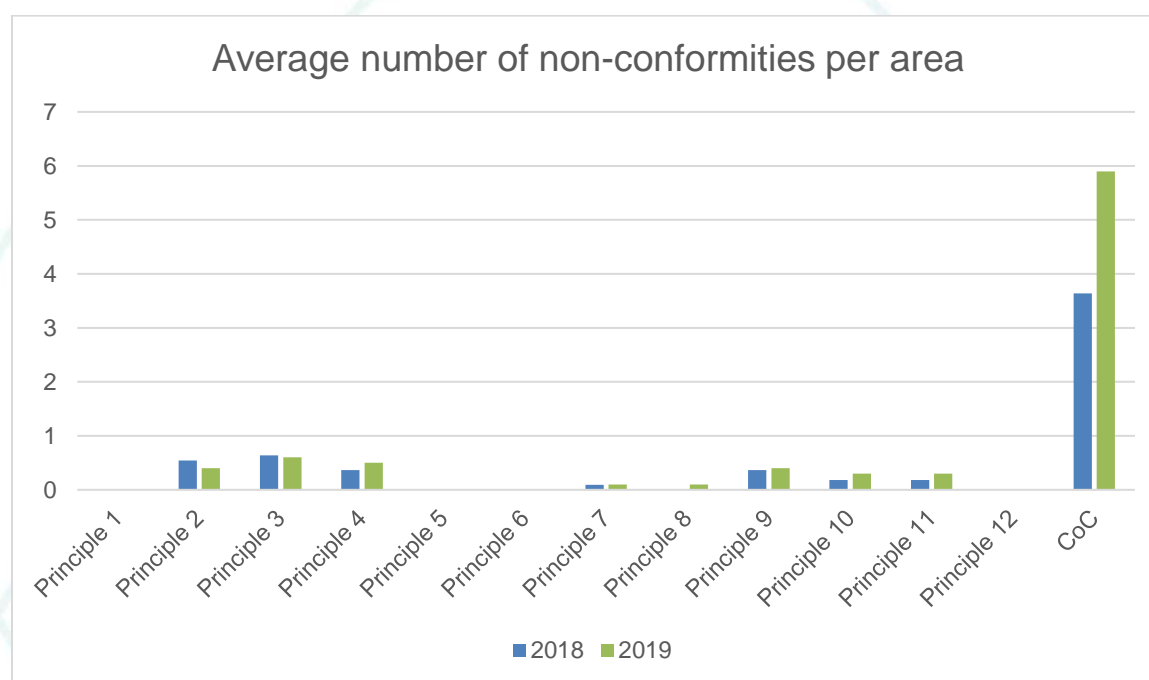


Figure 2: Average number of non-conformities per area and year

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 as well as novel biomass and biomaterial technologies such as oil and sugar based biofuels, cellulosic ethanol and chemicals, renewable diesel and biojet, bioplastics, biolubricants and other bio-based 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.⁵

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. Therefore, a list of certified operators, all certificates (valid, expired, terminated) as well as Audit Summary Reports are available online.⁶ The content of the Public Audit Summaries is defined in RSB-PRO-70-001 *Requirements for Certification Bodies and Auditors* and includes inter alia:

⁵ <http://rsb.org/certification/>

⁶ <http://rsb.org/certification/participating-operators/>

- 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 website⁷. 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.

RSB stakeholders receive quarterly newsletters informing them about updates in the RSB system, for example new members, certified operators, standard developments or partnerships. In addition to the regular newsletter, the RSB updates stakeholders via social media (Twitter, Facebook, LinkedIn)

The following communication activities were carried out in 2019:

- Several guidance documents were developed and circulated amongst certification bodies and certified operators in 2019. All documents are also available on the RSB website⁸:
 - Guidance on the implementation of Principles 4 and 12 (February 2019);
 - Guidance on the implementation of Principle 4 Criterion 4e (April 2019);
 - Guidance on scope changes (May 2019);
 - Guidance on claims for non-GMO use in cultivation (July 2019);
 - Guidance on Advanced Product claims (September 2019);
 - Guidance on the RSB accreditation scope (October 2019).
- 7 public consultations for the certification of operators were carried out;
- RSB newsletters were sent quarterly;
- Outreach activities related to standards development (see next item).

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*”

⁷ <https://rsb.org/certification/call-for-public-comment-certification/>

⁸ <https://rsb.org/the-rsb-standard/rsb-standard-tools-guidance/indicators-guidance/>

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-15-001⁹. 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

⁹ <https://rsb.org/wp-content/uploads/2020/01/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 2019:

In 2019, no major standard development was carried out. However, several RSB procedures were revised:

- RSB Procedure for Certification Bodies and Auditors [RSB-PRO-70-001]¹⁰: This procedure was revised to incorporate results from the annual assurance system review in order to enhance the overall performance of the system. For the revision of the procedure, input was sought from certification bodies and the accreditation body ASI (see further details in section k) on best practice).
- RSB Risk Management Procedure [RSB-PRO-60-001]: The RSB certification system is based on a comprehensive risk management approach. The RSB risk management approach is designed to identify and address risks to certified operators when implementing RSB requirements and to support operators, certification bodies and the RSB Secretariat to focus on those areas of implementation of the RSB standards which add risk to the system. It also allows for flexibility by adjusting the audit frequency and audit types to the risk class of operators. For this purpose, the RSB Risk Management Procedure comes with an excel-based risk assessment tool. For the revision of the procedure and the tool, certified operators as well as certification bodies and auditors were consulted twice (in 2018 and in 2019) to comment on the draft. The procedure and the tool were approved by the RSB Board of Directors for a one-year pilot period to gather further experience in the application of the tool.

¹⁰ <https://rsb.org/wp-content/uploads/2019/04/RSB-PRO-70-001-vers-3.5-Requirements-CBs-and-Auditors.pdf>

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.¹¹

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 2019, 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:

¹¹ http://rsb.org/wp-content/uploads/2017/03/RSB_RPT_Agrojibito_011216_PublicSummary-1.pdf

- Module 1: Introduction to the RSB, RSB Certification and the concept of participating operators
- Module 2: RSB Principles & Criteria
- Module 3: Advanced Fuels
- Module 4: Advanced Products
- Module 5: Greenhouse Gas emissions
- Module 6: Chain of Custody
- Module 8: Procedure for Certification Bodies and Auditors
- Module 9: Risk Management

Several additional measures were implemented in 2019 to ensure the training level of RSB auditors (see more information in section K) on Best Practice).

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 this 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.

¹² <https://rsb.org/wp-content/uploads/2019/06/RSB-Monitoring-Evaluation-System-Report-2018-Draft-2.pdf>

Aggregated data as of 31 December 2019:

- **Number of certificates**

RSB certificates	18
Sites covered	52
Countries	20
Area covered (in ha)	16,841

- **Production data**

	2017 report	2018 report	2019 report
Products RSB certified in MT (global + RSB EU RED)	305,046.24	368,776.13	432,619.70
Feedstock RSB certified in MT (RSB EU RED)	121,908.15	597,259.42	576,706.31
Product RSB certified in MT (RSB EU RED)	26,257.75	52,446.80	66,110.42

Detailed information on the countries of origin and biofuel types is included in the annex of this document and available on request.

The data is 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 certified material are required to implement an effective and transparent chain of custody tracking system in line with the RSB Standard 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 well¹⁴. Cases of misuse, misrepresentation or fraudulent claims are non-conformities that lead to the suspension of the certificate (see section b). In addition,

¹³ http://rsb.org/wp-content/uploads/2018/02/RSB-STD-11-001-20-001-ver.-3.6_RSB-EU-RED-Std-for-Traceability.pdf

¹⁴ <http://rsb.org/wp-content/uploads/2017/03/RSB-PRO-65-001-vers-3.1-RSB-Grievance-Procedure.pdf>

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.

RSB has recognised Accreditation Services International (ASI)¹⁵ 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.

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. 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;

¹⁵<https://www.asi-assurance.org/s/>

- Ensuring adequate evaluation of operators, procedures to issue certificates as well as dealing with non-compliances.

The accreditation process follows the *RSB Procedure 75-001 General requirements for accreditation bodies*¹⁶. 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 2019, two Certification Bodies are accredited in the RSB system.

CB	Location	Geographic Scope	Technical scope	Accreditation date	No of operators
Control Union Certifications B.V	The Netherlands	Worldwide	Full scope	Accredited: 04.11.2014 re-accredited on 02.11.2019	3
SCS Global Services	United States	Worldwide	Full scope	Accredited: 18.02.2015 re-accredited on 17.02.2020	15

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*.¹⁷ 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 2019 are documented in the *ASI Update on the RSB Accreditation Program, 2019 Annual Summary*, including assessments that were conducted, contents of the assessments and findings.

¹⁶ <http://rsb.org/wp-content/uploads/2018/02/RSB-PRO-75-001-vers.3.1-General-requirements-for-accreditation-bodies.pdf>

¹⁷ <https://www.asi-assurance.org/sfc/servlet.shepherd/version/download/0681H000004eM00QAE>

In total, 25 findings were raised, of which 20 are non-conformities that have to be closed by the Certification Bodies.

Normative document	Major NC	Minor NC	Total
RSB-PRO-70-001 v.3.3	3	0	3
RSB-PRO-70-001 v.3.5	3	12	15
ISO/IEC 17065:2012	1	1	2
Total	7	13	20

The ASI 2019 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.

System review and improvements in 2019

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.

The Assurance System Review for the period 2018 (conducted in 2019) showed risks and potential for improvement in the following areas:

- Training of auditors
- Chain of Custody audits
- Clear and transparent audit documentation

Measures as a result of the Assurance System Review

As a result of the internal assurance system review, the following system improvements have been implemented in 2019 to mitigate risks detected in the RSB system:

- **Chain of Custody Audits**
 - Going beyond the requirements of the EU Commission, the RSB system implemented a *reasonable level of assurance* for chain of custody and greenhouse gas related audits (the EU Commission only requires a limited level of assurance) through the *RSB Procedure for CBs and Auditors*;
 - More specific requirements related to chain of custody data verification as well as specific examples for audits related to Used Cooking Oil were included in the *RSB Procedure for CBs and Auditors* as well as RSB audit checklists;
 - The *RSB Procedure for CBs and Auditors* now defines more specific requirements for the technical review (as required by ISO 17065), to make sure that chain of custody information will be part of the technical review to strengthen the independence of the system;
 - The *RSB Procedure for CBs and Auditors* now requires that CBs include in their certification agreement with the operator a clause whereby the CB is entitled to verify deliveries received from upstream suppliers and deliveries made to downstream recipients of certified material;
 - The *CB Procedure for CBs and Auditors* now requires auditors to verify the location of points of origin delivering less than 10 metric tons per month on a sample basis (in addition to the sample that is required for points of origin delivering more than 10 metric tons per month).
- **Auditor training**
 - The *RSB Procedure for CBs and Auditors* now specifies that all auditors must not only receive RSB training but also continuous training updates;
 - The RSB Secretariat has set up a training database to monitor the training status of all active RSB auditors. This information will feed into annual office audits undertaken by the RSB accreditation body;

- The RSB Secretariat has set up a system to test the knowledge of RSB auditors in the technical areas that they are active in. This ensures that auditors will have up-to-date knowledge of RSB EU RED requirements;
- The RSB Secretariat organises (remote) calibration workshops bi-annually for all active auditors.
- **Audit documentation**
 - The RSB Secretariat will continue the focus on the structure and content audit documentation (i.e. audit reports, audit checklists, certificates) to ensure that they are clear and transparent.
- **Additional oversight activities**
 - More oversight activities are carried out by the RSB Secretariat in addition to the accreditation activities of the accreditation body and in addition to the assurance system review. This is laid down in the new *RSB Standard Operating Procedure for Assurance Oversight*. Additional activities include the sample review of auditor checklists and GHG calculation reports in addition to the public summary reports as well as witness audits in which the RSB Secretariat will participate as observer.