

Assessment of SSAP

Version as submitted 15 November 2018

Summary

An assessment has been made on compliance of the U.S. Soybean Sustainability Assurance Protocol (hereafter the “SSAP” scheme) as submitted to the European Commission for recognition, with the sustainability criteria of Directive 2009/28/EC.

The assessment results indicate that the SSAP meets the mandatory sustainability requirements of Directive 2009/28/EC of Directive 2009/28/EC on GHG, land-use, chain of custody and audit quality.

Scheme scope:

- Type of feedstock: Soybean for the production of biodiesel. Wastes and residues are not included in the scope of the scheme.
- Type of biofuel: Biofuels derived from soybeans.
- Geographic coverage: Soybeans originating from the United States (U.S.) only.
- Chain of custody coverage: Farm to export of soybeans. (Our understanding is that the scheme scope therefore excludes soybean crushing, shipping and biodiesel production and distribution.)

Background

The U.S. Soybean Sustainability Assurance Protocol (SSAP) was developed and is owned and managed by Soy Export Sustainability, LLC (SES), a subsidiary of the U.S. Soy Export Council (USSEC). SSAP aims to assure that soybeans cultivated in the U.S. are in compliance with the requirements of the RED.

The SSAP/RED system covers the sustainable cultivation of soybeans in the U.S. and is designed to be applied through the supply chain from farmer to soy exporter tracking soybean volumes exchanged under the SSAP/RED. The certification scheme is based on the U.S. national version of the Soy Sustainability Assurance Protocol (‘SSAP’) which only applies for the U.S. market. The SSAP is broader in scope than the RED’s requirements, additionally covering compliance with U.S. environmental laws and conservation programs. It is a requirement that SSAP/RED system participants are registered and fully compliant under the U.S. national SSAP scheme.

SES is comprised of different stakeholders of the U.S. soy market, including soybean producers and processors, traders, logistics providers as well as NGOs and scientific research institutes. SES operates through a **Management Board (Board)**, an **Advisory Committee (Committee)** and a **Secretary/Secretariat** which is responsible for the day to day operations.

The **Management Board** consists of five members with equal voting rights, representing both a diverse set of skills and experiences as well as the different

stakeholders. The board is appointed for a period of three years. It is inter alia the responsibility of the Board to:

- ensure the integrity of the SSAP/RED protocol,
- monitor the implementation process,
- guide the continuous improvement process, and
- communicate with stakeholders, including the European Commission.

The **Advisory Committee** will represent the broad range of stakeholders along the soy value chain, including representatives from non-governmental organizations.

The **Management Board** will appoint the secretary and can delegate the management and implementation of the scheme to the **Secretary/Secretariat** (who is either comprised of different natural persons or represented by one single person). The Secretariat will be responsible for the daily operation of the scheme, data collection and document management, and is furthermore responsible for the annual reporting requirements which will be submitted to the Commission as required and in the appropriate format.

Whereas compliance with the U.S. national SSAP scheme is verified through the USDA Natural Resources Conservation Service (NRCS) audit process, compliance with SSAP/RED is performed by independent certification bodies.

SSAP is seeking formal assessment and recognition by the European Commission for the SSAP/RED, as a 'voluntary scheme' to demonstrate compliance with Articles 17(2)-17(5) of the Renewable Energy Directive (RED).

Please note this assessment focuses on coverage of the mandatory criteria, Articles 17(2)-(5). Coverage of the criteria that are 'non-mandatory' for economic operators, Article 18(4), is not part of this assessment at this time.

Documents assessed

- Soy Export Sustainability, Governance Structure, Soybean Sustainability Assurance Protocol / RED ('SSAP/RED Protocol'), April 2018
- Soy Export Sustainability, SSAP/RED Protocol, Soybean Sustainability Assurance Protocol / RED (SSAP/RED Protocol), April 2018
- SSAP/RED Self Declaration / Self Assessment
- SSAP/RED requirements for sustainability declarations, U.S. Soybean Exporter
- SSAP SSAP/RED Requirements for elevators operating under the scope of certified First Gathering Points (FGP)

Assessment results

The summary results of the assessment are presented in the table below. The detailed assessment results are available in Annex 1.

Table 1: Assessment results - summary

RED Article	SSAP	Comments
	Version as submitted 15 November 2018	
Sustainability criteria		
17(2): Greenhouse gas emissions savings	Y	
calculation of actual emission savings	Y	
emission saving from soil carbon accumulation via improved agricultural management (e_{sca})	n/a	
emission saving from excess electricity from cogeneration (e_{ee})	n/a	
emission saving from carbon capture and geological storage (e_{ccs})	n/a	
emission saving from carbon capture and replacement (e_{ccr})	n/a	
17(3): Conservation of biodiversity	Y	
17(4): Conservation of carbon stocks	Y	
17(5): Conservation of peatlands	Y	
17(1): Exemption for wastes and Residues	n/a	
Chain of Custody		
18(1): Use of a mass balance system	Y	
Recognition of other voluntary schemes and national systems	Y	
Audit Quality and Scheme Governance		
18(5): Adequate standards of reliability, transparency and independent auditing	Y	

Annex 1: Detailed assessment results

Sustainability criteria

The sustainability criteria detailed below are the mandatory sustainability criteria of the RED: Article 17(2) – 17(5)).

Scope of the sustainability scheme for biofuels and bioliquids		
Requirement	Guidance	Assessment
0.1 Voluntary schemes can only demonstrate compliance with the sustainability criteria for biofuels and bioliquids.	<ul style="list-style-type: none"> Set the scope of the scheme applying the relevant definitions of Directive (2009/28/EC) for "biomass", "bioliquids" and "biofuels". 	<div>Y</div> <p>SSAP/RED Protocol</p> <ul style="list-style-type: none"> Objective The aim of aligning U.S. soybean production practices with the requirements of the European RED, is to assure that those soybeans can be used as input product qualifying as RED compliant biomass, bioliquids and biofuels. The aforementioned products are defined as below: <ul style="list-style-type: none"> 'Biomass' is defined as the biodegradable fraction of products, waste and residues from biological origin from agriculture (including vegetal and animal substances), forestry and related industries including fisheries and aquaculture, as well as the biodegradable fraction of industrial and municipal waste; 'Bioliquids' are defined as liquid fuel for energy purposes other than for transport, including electricity and heating and cooling, produced from biomass; and

			<ul style="list-style-type: none"> • 'Biofuels' are defined as liquid or gaseous fuel from transport produced from biomass.
Article 17(2): Greenhouse gas emissions savings	The use and production of biofuels and bioliquids should lead to reductions in greenhouse gas emissions compared to fossil fuels		
Requirement	Guidance	Assessment	
<p>1.1 The greenhouse gas emission saving from the use of biofuels shall be at least 60% for biofuels produced in installations starting operation after 5 October 2015. In the case of installations that were in operation on or before 5 October 2015 biofuels shall achieve a greenhouse gas emission saving of at least 35% until 31 December 2017 and at least 50% from 1 January 2018.</p> <p>Member States are obliged to transpose the amendments regarding the minimum GHG emissions savings set out in Directive (2015/1513/EU) by 10 September 2017.</p>	<ul style="list-style-type: none"> • With respect to Article 17(2) the primary role of the voluntary schemes is to ensure that operators deliver accurate data on GHG emissions of biofuels and bioliquids. • Member States will verify whether these emissions fulfil the requirements of the Renewable Energy Directive. For this purpose the Member States need to be informed whether the biofuel or bioliquid has been produced in an installation that was in operation on or before 5 October 2015. • An installation shall be considered to be in operation if the physical production of biofuels or bioliquids has taken place. 	n/a	<ul style="list-style-type: none"> • The coverage of SSAP is the cultivation stage and transport to an export facility only and not the full biofuel supply chain.

<p>1.2 The greenhouse gas emission saving from the use of biofuels and bioliquids shall be calculated in accordance with RED Article 19(1)-19(3), Annex V and Commission Decision 2010/335/EU of 10 June 2010.</p>	<ul style="list-style-type: none"> The greenhouse gas emission saving from the use of biofuel and bioliquids shall be calculated as follows: <ul style="list-style-type: none"> a. where a default value for greenhouse gas emission saving for the production pathway is laid down in part A or B of Annex V and where the e_i value for those biofuels or bioliquids calculated in accordance with point 7 of part C of Annex V is equal to or less than zero, by using that default value; b. by using an actual value calculated in accordance with the methodology laid down in part C of Annex V; or c. by using a value calculated as the sum of the factors of the formula referred to in point 1 of part C of Annex V, where disaggregated default values in part D or E of Annex V may be used for some factors, and actual values, calculated in accordance with the methodology laid down in part C of Annex V, for all other factors. 	<p>Y</p>	<p>SSAP/RED Protocol</p> <ul style="list-style-type: none"> 5. GHG Emissions This version of the SSAP/RED Protocol only supports the use of disaggregated default values for Cultivation, and Transport & Distribution as determined according to RED methodology. The values determined by the European Commission must be applied by the European buyers of the soy with an SSAP/RED compliant claim. Note: EU based importers may require maximum GHG values to assure that they meet the minimum GHG savings on the final biofuel (as presented in table 1 below) produced from U.S. soybeans against the fossil fuel references. These values are given in table 2. The use of disaggregated default values for Cultivation and Transport & Distribution is proven to be within the limit of reaching the GHG saving threshold for soybean based final biofuels. Table 1: Emission values for fossil references Table 2: Minimum saving potential Sustainable biofuels RED SSAP/RED is only focussing on soybeans that are exported to Europe before processing, therefore the element processing is not included in the scope of this protocol. The soybean exporter will have to declare GHG emission values for Cultivation and Transport & Distribution. GHG emission values can be determined by:
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		<ul style="list-style-type: none"> • 1) Referring to default values as written in the RED Annex V section D • a) Total default value • b) Disaggregated default value per supply chain element • 2) Individual calculated GHG emission value per SSAP/RED certified operator (not used as no individual calculated value methodology is included in this SSAP/RED Protocol) • In order to give the final biofuel producers the option to calculate their processing emissions, reference to total default value will not be allowed under SSAP/RED. The U.S. exporter only has to confirm the use of disaggregated default values by adding the following claim on the Sustainability Declaration: • E_{ec} = Cultivation • E_{td} = Transport & Distribution <p>SSAP/RED requirements for sustainability declarations</p> <p>U.S. Soybean Exporter</p> <ul style="list-style-type: none"> • GHG related information: • The relevant RED calculation formula elements have to be reported separately. For SSAP/RED certified soybean, these elements are: • e_{ec}: Emissions from the extraction or cultivation of soybean • e_{td}: Emissions from transport and distribution of soybean
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			<ul style="list-style-type: none"> More information on GHG emissions can be found in chapter 5 of the SSAP/RED Protocol.
1.3 Default values	<ul style="list-style-type: none"> Default values listed in Annex V can only be applied if the process technology and feedstock used for the production of the biofuel match their description and scope. In case specific technologies are set out the default values can only be used if those technologies were actually applied. One example is methane capture where the default value should only be applied when it is ensured that the methane is captured in an efficient manner. Details on the prerequisites for the use of the individual default values and how these prerequisites are assessed needs to be included in the system documentation. 	n/a	<ul style="list-style-type: none"> This version of the SSAP/RED Protocol only supports the use of disaggregated default values for Cultivation. and Transport & Distribution as determined according to RED methodology.
1.4 Actual values	<ul style="list-style-type: none"> Actual values can only be calculated when all relevant information is available and transmitted through the chain of custody: <ul style="list-style-type: none"> a. Actual values of emissions from cultivation can only be determined at the origin of the chain of custody. b. Actual values of emissions from transport can only be determined if 	Y	<p>SSAP/RED Protocol</p> <ul style="list-style-type: none"> 5. GHG Emissions This version of the SSAP/RED Protocol only supports the use of disaggregated default values for Cultivation. and Transport & Distribution as determined according to RED methodology.

	<p>emissions of all transport steps are recorded and transmitted through the chain of custody.</p> <p>c. Actual values of emissions from processing can only be determined if emissions of all processing steps are recorded and transmitted through the chain of custody.</p> <ul style="list-style-type: none"> • GHG emissions shall be reported using appropriate units. These are: <ul style="list-style-type: none"> a. g CO₂eq/dry-ton for raw materials and intermediary products b. g CO₂eq/MJ for final biofuels • When default values are used, information on GHG emissions should only be reported for final biofuels and can be reported as an aggregate. If relevant, both, the process technology and the raw material used need to be specified. • Member States, or competent authorities of third countries, may submit to the Commission reports including data on typical emissions from cultivation of feedstock¹. Voluntary schemes may allow operators to apply these values as an alternative to actual values provided 	
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¹ Article 19(3) Directive (2009/28/EC)

	<p>these have been published in the unit g CO₂eq/dry-ton of feedstock on the Commission website.</p> <ul style="list-style-type: none"> • Information on actual GHG emissions has to be provided for all relevant elements of the GHG emission calculation formula. Relevant refers in this context to elements for which reporting is obligatory (e.g. e_l in case of land use change), all elements for which actual values should be used instead of disaggregated default values and all elements related to emission savings (if applicable). • If at any point of the chain of custody emissions have occurred and are not recorded, so that the calculation of an actual value is no longer feasible for operators downstream in the chain of custody, this must be clearly indicated in the delivery notes. • GHG emissions from any land use change that has occurred since 1 January 2008 shall be taken into account in the greenhouse gas calculation, according to the methodology in the RED Annex V and Commission Decision 2010/335/EU of 10 June 2010. 	
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	<ul style="list-style-type: none"> • If a scheme permits the use of actual values it is required that the scheme documentation sets out in detail how e_{ec}, e_i, e_p and e_{td} are derived. Similarly, elements of the GHG emission calculation methodology representing measurements of emission savings such as e_{ccr}, e_{ccs}, e_{sca} and e_{ee} can be applied by economic operators within the scheme only when prerequisites on their use are fully described in the scheme documents. • For the purpose of actual GHG emission calculations, whenever available, the standard calculation values published on the Commission website should be applied. In case alternative values are chosen this must be duly justified and flagged up in the documentation of the calculations in order to facilitate the verification by auditors. 		
1.5 Adjustment of actual GHG emission estimates throughout the chain of custody	<ul style="list-style-type: none"> • Voluntary schemes shall lay down in detail how the required information of GHG emissions is transmitted through the chain of custody (i.e. in the delivery notes) and how these values are calculated. 	Y	SSAP/RED Protocol <ul style="list-style-type: none"> • 5. GHG Emissions • [...] In order to give the final biofuel producers the option to calculate their processing emissions, reference to total default value will not be allowed under SSAP/RED. The U.S. exporter only has to confirm the use of disaggregated default values by

	<ul style="list-style-type: none"> • At each step of the chain of custody it must be verified whether the emission estimate needs to be adjusted: <ul style="list-style-type: none"> a. Additional emissions from transport and/or processing have to be added to e_p and or e_{td} respectively. b. Energy losses occurred during processing or if relevant transportation or storage have to be taken into account using a 'feedstock factor'. c. Whenever a processing step yields co-products, emissions need to be allocated using an 'allocation factor' following the rules set out in the GHG emission calculation methodology. d. At the last processing step the emission estimate needs to be converted into the unit $g\ CO_2eq/MJ$ of final biofuel. 		<p>adding the following claim on the Sustainability Declaration:</p> <ul style="list-style-type: none"> • E_{ec}: "Use of disaggregated default value for cultivation" • E_{td}: "Use of disaggregated default value for transport and distribution" • The requirements for Sustainability Declarations as well as the audit procedures determine the requirements for companies in order to assure the correct declaration of GHG values.
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Article 17(3): Conservation of biodiversity	Biofuels and bioliquids shall not be made from raw material obtained from land with high biodiversity value	
Requirement	Guidance	Assessment
2.1 Conservation of primary forest and other wood land	<ul style="list-style-type: none"> • Biofuels and bioliquids shall not be made from raw material obtained from land that was primary forest or other wooded land in or after January 2008, whether or not the land continues to have that status. • Primary forest and other wooded land is defined as forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed. 	<div>Y</div> <p>SSAP/RED Protocol</p> <ul style="list-style-type: none"> • PILLAR 1: BIODIVERSITY AND HIGH CARBON STOCK PRODUCTION CONTROL MEASURES AND REGULATIONS • Soybeans are produced only on existing agricultural land as defined in CFR Title 40 Part 80 Subpart M 80.1401 as cropland, pastureland, primary forest and land enrolled in the Conservation Reserve Program that was cleared or cultivated prior to December 19, 2007 and that, on December 19, 2007 was non-forested and actively managed as agricultural land, as evidenced by records traceable to the land in question. • For the specific purpose of demonstrating compliance with the land use requirements of Article 17 of the RED and subsequent Commission communications and regulations, it is required that soybeans will not be produced in the following areas: [...] • 1.3.1 Producers are in compliance with U.S. laws prohibiting conversion of primary forests to other uses. Primary forests are defined as forest or wooded land of native species where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed.

			<ul style="list-style-type: none"> • 1.5 Soybeans are not produced on land that was primary forest (Article 17 3 a) • 1.5.1 Producers are in compliance with U.S. laws prohibiting conversion of primary forests to other uses • 1.5.2 Producers are in compliance with U.S. laws prohibiting the conversion of public lands in National Forests and National Grasslands • For the purpose of cross referencing, below the RED articles 17(1) – (5) are referred to in full. In case the above definitions and wordings differ from the RED definitions below, the RED definitions shall prevail. [...] • Annex I Glossary • Primary Forest: Primary forests are defined as forest or wooded land of native species where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed.
2.2 Conservation of protected areas	<ul style="list-style-type: none"> • Biofuels and bioliquids shall not be made from raw material obtained from land that was a protected area in or after January 2008, whether or not the land continues to have that status. • This includes areas designated: <ul style="list-style-type: none"> i) by law or by the relevant competent authority for nature protection purposes; or ii) for the protection of rare, threatened 	Y	SSAP/RED Protocol <ul style="list-style-type: none"> • PILLAR 1: BIODIVERSITY AND HIGH CARBON STOCK PRODUCTION CONTROL MEASURES AND REGULATIONS • Soybeans are produced only on existing agricultural land as defined in CFR Title 40 Part 80 Subpart M 80.1401 as cropland, pastureland, primary forest and land enrolled in the Conservation Reserve Program that was cleared or cultivated prior to December 19, 2007 and that, on December 19, 2007 was non-forested and

	<p>or endangered ecosystems or species recognised by international agreements or included in lists drawn up by intergovernmental organisations or the International Union for the Conservation of Nature, subject to their recognition in accordance with the second subparagraph of Article 18(4) of the RED.</p> <ul style="list-style-type: none"> • An exception is possible if evidence is provided that the production of that raw material did not interfere with those nature protection purposes. 		<p>actively managed as agricultural land, as evidenced by records traceable to the land in question.</p> <ul style="list-style-type: none"> • For the specific purpose of demonstrating compliance with the land use requirements of Article 17 of the RED and subsequent Commission communications and regulations, it is required that soybeans will not be produced in the following areas: [...] • 1.1.1 Producers are in compliance with U.S. laws that prohibit altering the habitat where endangered or threatened species are found in such a way that disrupts essential behavioural patterns including but not limited to: breeding, feeding, sheltering (Article 17 3 b i and ii). • 1.1.2 Producers are in compliance with U.S. Endangered Species Act to protect listed animal and plant species from extinction by preserving the ecosystems in which they survive. • 1.1.2.1 A Habitat Conservation Plan is required as part of an application by private entities prior to undertaking projects that might result in the destruction of an endangered or threatened species (Article 17 3 b ii). • 1.6 Soybeans are not produced on designated protected areas (Article 17 3 b) • 1.6.1 Producers are in compliance with U.S. laws that prohibit the production of soybeans on land under federal protected status, land designated Wilderness or Research Natural Areas, protected land in National
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			<p>Forests and Grasslands, and land in the National Landscape Conservation System</p> <ul style="list-style-type: none"> • 1.6.2 Producers are in compliance with U.S. laws that prohibit production of soybeans on land protected by National Park Service • 1.9 Should the European Commission recognized areas or lists for the protection of rare, threatened or endangered ecosystems or species recognized by international agreements or included in lists drawn up by intergovernmental organizations or the International Union for the Conservation of Nature in the context of Article 17 (3)(b)(ii) and/or Article 18 (4) those areas shall also be included in the SSAP/RED. • For the purpose of cross referencing, below the RED articles 17(1) – (5) are referred to in full. In case the above definitions and wordings differ from the RED definitions below, the RED definitions shall prevail. [...]
2.3 Conservation of highly biodiverse grassland	<ul style="list-style-type: none"> • Biofuels and bioliquids shall not be made from raw material obtained from land that was highly biodiverse grassland in or after January 2008, whether or not the land continues to have that status. • Highly biodiverse grassland is defined as: <ul style="list-style-type: none"> i) natural, namely grassland that would remain grassland in the absence of human intervention and which maintains the natural species composition and 	Y	<p>SSAP/RED Protocol</p> <ul style="list-style-type: none"> • PILLAR 1: BIODIVERSITY AND HIGH CARBON STOCK PRODUCTION CONTROL MEASURES AND REGULATIONS • Soybeans are produced only on existing agricultural land as defined in CFR Title 40 Part 80 Subpart M 80.1401 as cropland, pastureland, primary forest and land enrolled in the Conservation Reserve Program that was cleared or cultivated prior to December 19, 2007 and that, on December 19, 2007 was non-forested and

	<p>ecological characteristics and processes; or</p> <p>ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and which is species-rich and not degraded, unless evidence is provided that the harvesting of the raw material is necessary to preserve its grassland status.</p> <ul style="list-style-type: none"> • Commission Regulation (EU) No 1307/2014 establishes definitions of 'grassland', 'human intervention', 'degraded' and 'species-rich' in the context of this criterion and furthermore, clarifies that grasslands in the following geographic ranges of the European Union shall always be regarded as highly biodiverse grassland: <ul style="list-style-type: none"> (1) habitats as listed in Annex I to Council Directive 92/43/EEC (1); (2) habitats of significant importance for animal and plant species of Union interest listed in Annexes II and IV to Directive 92/43/EEC; (3) habitats of significant importance for wild bird species listed in Annex I to 		<p>actively managed as agricultural land, as evidenced by records traceable to the land in question.</p> <ul style="list-style-type: none"> • For the specific purpose of demonstrating compliance with the land use requirements of Article 17 of the RED and subsequent Commission communications and regulations, it is required that soybeans will not be produced in the following areas: [...] • 1.1 Soybeans are not produced on highly biodiverse grassland, (Article 17 3 c) defined as a terrestrial ecosystem dominated by herbaceous or shrub vegetation for at least 5 years continuously, including meadows and pasture that is cropped for hay but excludes land cultivated for other production and cropland lying temporarily fallow and grassland that is natural, namely that it would remain grassland in the absence of human intervention (defined as managed grazing, mowing, cutting, harvesting or burning) and which maintains the natural species composition and ecological characteristics and processes; or non-natural, namely that it would cease to be grassland in the absence of human intervention and which is species rich and not degraded. Species rich is defined as a habitat of significant importance to critically endangered, endangered or vulnerable species as classified by the International Union of the Conservation of Nature Red List of Threatened Species or other lists with similar purpose for species or habitats laid down in national legislation or recognized by a competent national authority, or a habitat of
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	<p>Directive 2009/147/EC of the European Parliament and of the Council.</p> <ul style="list-style-type: none"> • The following approach must be taken when determining whether land is (or in the case of conversion was) highly biodiverse grassland: <ul style="list-style-type: none"> ◦ The lead auditor must judge whether an assessment of highly biodiverse grassland is necessary. ◦ If an assessment is necessary, it must be conducted by a qualified independent specialist who may be additional to the audit team. The assessment and result must then be reviewed as part of the audit. 		<p>significant importance to endemic or restricted range species or a habitat of significant importance to intra-species genetic diversity or a habitat of significant importance to globally significant concentrations of migratory species or a regionally or nationally significant or highly threatened or unique ecosystem (Article 17 3 b ii).</p> <ul style="list-style-type: none"> • For the purpose of cross referencing, below the RED articles 17(1) – (5) are referred to in full. In case the above definitions and wordings differ from the RED definitions below, the RED definitions shall prevail. [...] • Annex I Glossary • Grassland: Means terrestrial ecosystems dominated by herbaceous or shrub vegetation for at least 5 years continuously. It includes meadows or pasture that is cropped for hay but excludes land cultivated for other crop production and cropland lying temporarily fallow. It further excludes continuously forested areas as defined in Pillar 1 paragraph 1.3 unless these are agroforestry systems which include land-use systems where trees are managed together with crops or animal production systems in agricultural settings. The dominance of herbaceous or shrub vegetation means that their combined ground cover is larger than the canopy cover of trees • Human Intervention: Means managed grazing, mowing, cutting, harvesting or burning
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		<ul style="list-style-type: none"> • Species Rich: a) a habitat of significant importance to critically endangered, endangered or vulnerable species as classified by the International Union for the Conservation of Nature Red List of Threatened Species or other lists with a similar purpose for species or habitats laid down in national legislation or recognised by a competent national authority in the country of origin of the raw material; or b) a habitat of significant importance to endemic or restricted-range species; or c) a habitat of significant importance to intra-species genetic diversity; or d) a habitat of significant importance to globally significant concentrations of migratory species or congregatory species; or e) a regionally or nationally significant or highly threatened or unique ecosystem
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Article 17(4): Conservation of carbon stocks	Biofuels and bioliquids shall not be made from raw material obtained from land with high carbon stock	
Requirement	Guidance	Assessment
3.1 Conservation of wetlands	<ul style="list-style-type: none"> • Biofuels and bioliquids shall not be made from raw material obtained from land that was wetland in January 2008 and no longer has that status. 	<p>Y SSAP/RED Protocol</p> <ul style="list-style-type: none"> • PILLAR 1: BIODIVERSITY AND HIGH CARBON STOCK PRODUCTION CONTROL MEASURES AND REGULATIONS • Soybeans are produced only on existing agricultural land as defined in CFR Title 40 Part 80 Subpart M

	<ul style="list-style-type: none"> • A wetland is land that is covered with or saturated by water permanently or for a significant part of the year. <ul style="list-style-type: none"> ◦ Evidence of verification should reflect seasonal changes within a year • These provisions shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008. 		<p>80.1401 as cropland, pastureland, primary forest and land enrolled in the Conservation Reserve Program that was cleared or cultivated prior to December 19, 2007 and that, on December 19, 2007 was non-forested and actively managed as agricultural land, as evidenced by records traceable to the land in question.</p> <ul style="list-style-type: none"> • For the specific purpose of demonstrating compliance with the land use requirements of Article 17 of the RED and subsequent Commission communications and regulations, it is required that soybeans will not be produced in the following areas: [...] • 1.2 Soybeans are not produced on wetlands (Article 17 4 a and 5) • 1.2.1 Producers are in compliance with Section 404 of Clean Water Act regarding agricultural impacts on wetlands • 1.2.2 Producers are in compliance with U.S. Wetlands Conservation provisions, which means: <ul style="list-style-type: none"> • 1.2.2.1 USDA keeps record of Wetland Determinations. Producers may obtain aerial imagery of their farms and a printout of their farm and tract records from local USDA office administering their farm • 1.2.2.2 Producers will maintain compliance with wetland conservation regulations by creating a required conservation system plan • 1.2.2.3 Producers will not plant on a converted wetland • 1.2.2.4 Producers will not convert a wetland to make possible production of agricultural commodity
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			<ul style="list-style-type: none"> • 1.2.2.5 Wetlands are defined as land that is covered with or saturated by water permanently or for a significant part of the year. In order to confirm if land complies to this definition, specific indicators are used to verify and reflect seasonal changes within a given year. • For the purpose of cross referencing, below the RED articles 17(1) – (5) are referred to in full. In case the above definitions and wordings differ from the RED definitions below, the RED definitions shall prevail. [...] • Annex I Glossary • Wetland: Land that is covered with or saturated by water permanently or for a significant part of the year. In order to confirm if land complies to this definition, specific indicators are used to verify and reflect seasonal changes within a given year.
3.2 Conservation of continuously forested areas	<ul style="list-style-type: none"> • Biofuels and bioliquids shall not be made from raw material obtained from land that was continuously forested in January 2008 and no longer has that status. • Continuously forested areas are defined as land spanning more than one hectare with trees higher than five metres and a canopy cover of more than 30%, or 	Y	SSAP/RED Protocol <ul style="list-style-type: none"> • PILLAR 1: BIODIVERSITY AND HIGH CARBON STOCK PRODUCTION CONTROL MEASURES AND REGULATIONS • Soybeans are produced only on existing agricultural land as defined in CFR Title 40 Part 80 Subpart M 80.1401 as cropland, pastureland, primary forest and land enrolled in the Conservation Reserve Program that was cleared or cultivated prior to December 19, 2007 and that, on December 19, 2007 was non-forested and

	<p>trees able to reach those thresholds in situ.</p> <ul style="list-style-type: none"> Continuously forested areas do not include land that is predominantly under agricultural or urban land use. In this context, agricultural land use refers to tree stands in agricultural production systems, such as fruit tree plantations, oil palm plantations and agroforestry systems when crops are grown under tree cover. These provisions shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008. 	<ul style="list-style-type: none"> actively managed as agricultural land, as evidenced by records traceable to the land in question. For the specific purpose of demonstrating compliance with the land use requirements of Article 17 of the RED and subsequent Commission communications and regulations, it is required that soybeans will not be produced in the following areas: [...] 1.3 Soybeans are not produced on forest land; defined as a land cover/use category that is at least 10 percent canopy cover stocked by single stemmed woody species of any size that will be at least 4 meters tall at maturity. The minimum areas for classification as forestland is one acre and the area must be at least 100 feet wide. (Article 17 3a, 4b,4c). 1.3.1 Producers are in compliance with U.S. laws prohibiting conversion of primary forests to other uses. Primary forests are defined as forest or wooded land of native species where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed. For the purpose of cross referencing, below the RED articles 17(1) – (5) are referred to in full. In case the above definitions and wordings differ from the RED definitions below, the RED definitions shall prevail. [...] Annex I Glossary Continuously Forested Land:
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			<ul style="list-style-type: none"> Continuously forested land is defined as a land cover/use category that is at least 30 percent stocked by single stemmed woody species of any size that will be at least 4 meters tall at maturity. The minimum areas for classification as forestland is 1 acre and at least 100 feet wide. (Article 17 3a, 4b).
3.3 Conservation of forested areas with 10-30% canopy cover	<ul style="list-style-type: none"> Biofuels and bioliquids shall not be made from raw material obtained from land that was sparsely forested in January 2008 and no longer has that status. Sparsely forested areas are defined as land spanning more than one hectare with trees higher than five metres and a canopy cover of between 10% and 30%, or trees able to reach those thresholds in situ, unless evidence is provided that the carbon stock of the area before and after conversion is such that, when the methodology laid down in part C of Annex V is applied, the greenhouse gas threshold (principle 1 above) would still be fulfilled. These provisions shall not apply if, at the time the raw material was obtained, the land had the same status as it had in January 2008. 	Y	SSAP/RED Protocol <ul style="list-style-type: none"> PILLAR 1: BIODIVERSITY AND HIGH CARBON STOCK PRODUCTION CONTROL MEASURES AND REGULATIONS Soybeans are produced only on existing agricultural land as defined in CFR Title 40 Part 80 Subpart M 80.1401 as cropland, pastureland, primary forest and land enrolled in the Conservation Reserve Program that was cleared or cultivated prior to December 19, 2007 and that, on December 19, 2007 was non-forested and actively managed as agricultural land, as evidenced by records traceable to the land in question. For the specific purpose of demonstrating compliance with the land use requirements of Article 17 of the RED and subsequent Commission communications and regulations, it is required that soybeans will not be produced in the following areas: [...] 1.3 Soybeans are not produced on forest land; defined as a land cover/use category that is at least 10 percent canopy cover stocked by single stemmed woody species of any size that will be at least 4 meters tall at maturity. The minimum areas for classification as

			<p>forestland is one acre and the area must be at least 100 feet wide. (Article 17 3a, 4b,4c).</p> <ul style="list-style-type: none"> • For the purpose of cross referencing, below the RED articles 17(1) – (5) are referred to in full. In case the above definitions and wordings differ from the RED definitions below, the RED definitions shall prevail. [...] • Appendix I Glossary • Other Forested Land • Other forested land is defined as land cover/use category that is between 10 and 30 percent stocked by single stemmed wood species of any size that will be at least 4 meters tall at maturity. (Article 17 3a, 4c).
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Article 17(5): Conservation of peatlands	Biofuels and bioliquids shall not be made from raw material obtained from peatland	
Requirement	Guidance	Assessment
4.1 Conservation of peatlands	<ul style="list-style-type: none"> • Biofuels and bioliquids shall not be made from raw material obtained from land that was peatland in January 2008. • An exception is possible if evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. 	<p>Y SSAP/RED Protocol</p> <ul style="list-style-type: none"> • PILLAR 1: BIODIVERSITY AND HIGH CARBON STOCK PRODUCTION CONTROL MEASURES AND REGULATIONS • Soybeans are produced only on existing agricultural land as defined in CFR Title 40 Part 80 Subpart M 80.1401 as cropland, pastureland, primary forest and land enrolled in the Conservation Reserve Program that

	<ul style="list-style-type: none"> • For peatland that was partially drained in January 2008 a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion. 	<p>was cleared or cultivated prior to December 19, 2007 and that, on December 19, 2007 was non-forested and actively managed as agricultural land, as evidenced by records traceable to the land in question.</p> <ul style="list-style-type: none"> • For the specific purpose of demonstrating compliance with the land use requirements of Article 17 of the RED and subsequent Commission communications and regulations, it is required that soybeans will not be produced in the following areas: [...] • 1.4 Soybeans are not produced on peatland (Article 17 5) • 1.4.1 Producers are in compliance with Section 404 of Clean Water Act regarding agricultural impacts on wetlands • 1.4.2 Producers are in compliance with U.S. Wetlands Conservation provisions that prohibit production of an agricultural commodity of peatland converted after December 23, 1985 • 1.8 Producers planning to remove fence rows, combine crop fields, divide a crop field into two or more fields, or improve or modify existing drainage must notify USDA-FSA for appropriate technical determinations and obtain prior approval. Improving or modifying existing drainage should not result in drainage of deeper soil layers compared to the drainage existing in January 2008, to stay in line with Article 17 (5) of the RED. • For the purpose of cross referencing, below the RED articles 17(1) – (5) are referred to in full. In case the
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			<p>above definitions and wordings differ from the RED definitions below, the RED definitions shall prevail. [...]</p> <ul style="list-style-type: none"> • Annex I Glossary • Peatland: Peatland soils are soils with horizons of organic material (peat substrate) of a cumulative thickness of at least 30 cm at a depth of down to 60 cm. The organic matter contains at least 20 mass percent of organic carbon in the fine soil.
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<p>Article 17(1): Exemption for wastes and residues</p>	<p>Biofuels and bioliquids produced from wastes and residues, other than agricultural, aquaculture, fisheries and forestry residues, need only fulfil the sustainability criteria set out in [Article 17(2)]</p>	
<p>Approach to wastes and residues (OPTIONAL – only assessed if scheme includes exemption for wastes and residues)</p>	<ul style="list-style-type: none"> The Commission is able to recognise voluntary schemes as containing accurate data for the purposes of Article 17(2) and to demonstrate that biofuels comply with the sustainability criteria in Articles 17(3)-(5) (see Article 18(4), 2nd sub-paragraph). Thereby, in the context of a voluntary scheme, the Commission can recognise rules related to wastes and residues for the purposes of whether or not: <ul style="list-style-type: none"> biofuels from a certain feedstock have to demonstrate compliance with the land use criteria (Article 17(1): “biofuels and bioliquids produced from waste and residues, other than agricultural, aquaculture, fisheries and forestry residues, need only [comply with the GHG threshold]”). 	<p>n/a SSAP/RED Protocol</p> <ul style="list-style-type: none"> Introduction and Scope Scope: The applicable feedstock is soybeans cultivated in the United States for the production of biodiesel in the European Union. Soybean waste and residual streams are excluded. This scheme does not include ligno-cellulosic and non-food cellulosic material. The Chain of Custody coverage is the cultivation stage and transport to the First Gathering Point only, without having an option for individual farm or farm group certification. Both soybean processing steps, and the use of waste/residues is not covered in this scheme.

	<ul style="list-style-type: none"> ○ certain feedstocks can be considered to have zero GHG emissions to the point of collection (Annex V, Part C, 18: "Wastes, agricultural crop residues, including straw, bagasse, husks, cobs and nut shells, and residues from processing, including crude glycerine (glycerine that is not refined), shall be considered to have zero life-cycle greenhouse gas emissions up to the process of collection of those materials.") In this context, the "point of collection" is the point where the waste or the residue arises in the first place (e.g. for used cooking oil this would be the restaurants or plants producing the fried products). • The following requirements apply for the verification of the chain of custody of biofuels made from waste and processing residues: <ul style="list-style-type: none"> ○ The whole chain of custody needs to be covered starting from its origin, i.e. the economic operator where the waste or residue material arises. 		
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	<ul style="list-style-type: none"> ○ As a principle, all economic operators need to be audited individually. Only at the origin of the chain of custody (e.g. restaurants) can group auditing approaches be considered (see requirement 6.4). ○ The frequency and intensity of the auditing procedure needs to reflect the level of risk. • Include the following definitions set out in Directive (2009/28/EC) for: <ul style="list-style-type: none"> ○ “agricultural, aquaculture, fisheries and forestry residues” ○ “processing residue” ○ “waste” 		
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Chain of Custody

Article 18(1): Use of a mass balance system	Economic operators shall use a mass balance system	
Requirement	Guidance	Assessment
5.1 Economic operators shall use a mass balance system	<ul style="list-style-type: none"> The mass balance system: <ul style="list-style-type: none"> a) allows consignments of raw material or biofuel with differing sustainability characteristics to be mixed; b) requires information about the sustainability characteristics and sizes of the consignments referred to in point a) to remain assigned to the mixture; and c) provides for the sum of all consignments withdrawn from the mixture to be described as having the same sustainability characteristics, in the same quantities, as the sum of all consignments added to the mixture. 	<p>Y SSAP/RED Protocol</p> <ul style="list-style-type: none"> 3. Mass Balance This section describes which procedures should be followed to preserve the SSAP/RED complaint claim throughout the supply chain. In Figure 1, the elevators and the FGP act as physical storage location, and are therefore subject to implementing a correct mass balance, they are together referred to as Mass Balance Location in Annex I of this protocol. [...] The certified entity is responsible for correct implementation. In the section below, the mass balance principles, calculation rules and mass balance period are described. 3.1 Mass Balance Principle The mass balance principle is widely used in supply chains through which material with a certified chain physically flows through several locations. It is very common that the different companies are trading material with a certified claim simultaneously with a non-certified claim. In order to avoid limitations in storage facilities, the certified claim can be disconnected from the physical soybeans, when mass

			<p>balance calculation rules are followed, as per Article 18 1 in the RED.</p> <p><i>(a) allows consignments of raw material or biofuel with differing sustainability characteristics to be mixed;</i></p> <p><i>(b) requires information about the sustainability characteristics and sizes of the consignments referred to in point (a) to remain assigned to the mixture; and</i></p> <p><i>(c) provides for the sum of all consignments withdrawn from the mixture to be described as having the same sustainability characteristics, in the same quantities, as the sum of all consignments added to the mixture.</i></p> <ul style="list-style-type: none"> • To summarize: the main principle of mass balance is: • Amount of outgoing soybeans ≤ Amount of incoming soybeans per location. • It has to be assured that the company owning the soybeans stored in a mass balance location never sells more soybeans with a SSAP/RED claim than they have on stock within the relevant period. • Annex I Glossary • Mass Balance: Each physical location that stores soybean that is no longer in legal ownership of the farmer is subject to mass balance and its calculation rules. A mass balance system a) allows consignments of soybeans with differing sustainability characteristics to be mixed, b) requires information about the sustainability characteristics and sizes of the consignments referred to in point a) to remain assigned to the mixture; and c) provides for the sum of
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			<p>all consignments withdrawn from the mixture to be described as having the same sustainability characteristics, in the same quantities, as the sum of all consignments added to the mixture. Whenever the physical location also stores soybeans certified under another RED sustainability scheme, proof should also be shown that the balance prevents double counting on the sustainability requirements (e.g. applying sustainability characteristics from SSAP/RED soy to soy from other RED compliant soy and to soy from non-sustainable sources). This must be proven by administering unique reference numbers in outgoing batches that are linked to the different soy purchase batches with these different claims. The same would apply when soybeans without a sustainability claim are part of the mixture. This means that soybean can be stored with and without SSAP/RED compliant claim. Physical mixing of soybean with different claims is allowed, as long as the mass balance administration proves that no more soybean with SSAP/RED claim is shipped out, than the amount that entered the location. [Same text also included in section 3.2 Mass Balance Claims – quoted below]</p>
5.2 Prevention of multiple claiming	<ul style="list-style-type: none"> An information system needs to be included by each economic operator which is able to keep track of the amounts of sustainable material sourced and sold. This could include, <i>inter alia</i>, a 	Y	<p>SSAP/RED Protocol</p> <ul style="list-style-type: none"> 3. Mass Balance 3.2 Mass Balance Claims As per above mass balance definition point (a) above, there are different sustainability characteristics that

	<p>digital database, documentation with unique reference numbers for consignments or similar.</p> <ul style="list-style-type: none"> • [See also requirement 6.7 below.] 		<p>should be registered. One of these characteristics is the sustainability claim of the product. The SSAP/RED Protocol considers two different sustainability claim options:</p> <ul style="list-style-type: none"> • 1) SSAP/RED compliant claim • For all material included in a soybean export that was received under the control of the SSAP/RED Protocol. If this is not specifically defined on the sustainability declaration, the receiver must assume option 2 • 2) RED compliant claim • For all material included in a soybean export that was received by the exporter with a claim from another RED voluntary scheme that meets SSAP/RED recognition requirements. • More information on recognition of other RED schemes within SSAP/RED can be found in chapter 6 of the protocol. • Whenever the mass balance location also stores soybeans certified under another RED sustainability scheme, proof should also be shown that the balance prevents double counting on the sustainability requirements (e.g. applying sustainability characteristics from SSAP/RED soy to soy from other RED compliant soy and to soy from non-sustainable sources). This must be proven by administrating unique reference numbers in outgoing batches that are linked to the different soy purchase batches with these different claims. Allocating unique reference numbers to all outgoing batches is considered best practice with
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			<p>respect to the prevention of multiple counting. The same would apply when soybeans without a sustainability claim are part of the mixture. This means that soybean can be stored with a SSAP/RED compliant claim, a RED compliant claim or without any sustainability claim. Physical mixing of soybean with different claims is allowed, as long as mass balance administration proves that no more soybean with SSAP/RED claim is shipped out, than the amount that entered the location.</p> <ul style="list-style-type: none"> • 3.3 Mass Balance Period • [...] By implementing above mass balance rules, it is prevented on a periodical basis that more material with a compliant claim is sold than physically available. Another important aspect is, the certified entity should prevent multiple claiming, in the event that the entity is certified under multiple RED schemes. For the SSAP/RED recognition on other RED schemes, see chapter 6. • More specific requirements on this topic can be found in the audit procedures of SSAP/RED. • 6. Recognition of other RED schemes • SSAP/RED is a scheme that is focusing on soybeans from U.S. origin. In case U.S. soybeans are bought with a claim of another RED scheme, and sold by companies operating under SSAP/RED, it is allowed to use the SSAP/RED compliant claim, or alternatively the RED compliant claim. It is explicitly not allowed to
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			<p>bring other feedstocks than soybean under the scope of SSAP/RED</p> <ul style="list-style-type: none"> • Import soybeans from outside the U.S. (with another RED claim) and sell those soybeans with a SSAP/RED claim. <p>SSAP/RED requirements for sustainability declarations U.S. Soybean Exporter</p> <ul style="list-style-type: none"> • This document lists all the requirements for sustainability declarations under the U.S. SSAP/RED Protocol. The requirements in bold are already provided on the export certificate. Additional information has to be provided when a SSAP/RED or RED compliant claim is given to the soybean. • General information: <ul style="list-style-type: none"> ○ Name and address of the soybean supplier ○ Name and address of the soybean recipient ○ Related contract number ○ Date and place of physical dispatch of the sustainable soybean ○ Date of issuance of the sustainability declaration ○ Name of certification system and scope certificate number of the certified supplier ○ Unique number of the Sustainability Declaration (the annex, a running number) • Product related information: <ul style="list-style-type: none"> ○ Outgoing sustainable product specification (soybean)
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			<ul style="list-style-type: none"> o Quantity of sustainable soybean (in metric ton) o Country of origin of the soybean, where the soybean was cultivated o Statement “SSAP/RED Compliant” (if applicable), or statement “EU RED Compliant” (if applicable)
5.3 The mass balance system shall operate at least at the level of a site	<ul style="list-style-type: none"> • The mass balance system shall operate at a level where consignments could normally be in contact, such as in a container, processing or logistical facility or site (defined as a geographical location with precise boundaries within which products can be mixed). • If more than one legal entity operates on a site then each legal entity is required to operate its own mass balance. 	Y	<ul style="list-style-type: none"> • GHG related information: [...]
			<ul style="list-style-type: none"> • SSAP/RED Protocol • Annex I Glossary • Elevator: The elevator acts as the first physical collection point and storage location of the Soybean. It will act as the first mass-balance location in the SSAP/RED supply chain. Administration responsibility of the mass balance location is with the certified legal entity (e.g. FGP), but administration should always be linked to information collected at the elevator. The elevator may take up delegated tasks from the FGP, such as the collection of self-declarations to the elevator, but the FGP remains responsible for the internal monitoring system. • Mass Balance Location: The physical location where soybean are stored that is no longer in legal ownership of the farmer. The mass balance system operates at the level of a site which is defined as a geographic location with precise boundaries within which products can be mixed. If more than one legal entity operates at

			a given site, then each entity is required to operate their own mass balance system.
5.4 The mass balance shall specify the timeframe over which the system operates	<ul style="list-style-type: none"> • If the balance in the system is continuous in time, a "deficit", i.e. that at any point in time more sustainable material has been withdrawn than has been added, is required not to occur. • Alternatively the balance could be achieved over an appropriate period of time (up to a maximum of three months) and regularly verified. • In both cases it is necessary for appropriate arrangements to be in place to ensure that the balance is respected. 	Y	SSAP/RED Protocol <ul style="list-style-type: none"> • 3. Mass Balance • 3.3 Mass Balance Period • In order to assure practical implementation of mass balance rules, the RED allows the mass balance principle to be applied on a periodic basis of maximum 3 months, rather than real time application (Article 18 1). The length of the period can be chosen freely but consequent, up to a length of 3 months. Within such a period it is allowed to sell and ship material from the location with an SSAP/RED compliant claim in advance of the physical arrival of the incoming material carrying that claim. However, it has to be assured that before the end of the mass balance period, enough compliant soybean physically entered the mass balance location to represent the volume of the material sold and shipped from the location. • By implementing above mass balance rules, it is prevented on a periodical basis that more material with a compliant claim is sold than physically available. [...]
5.5 Apply relevant feedstock definitions	<ul style="list-style-type: none"> • When reporting on the type of feedstock the relevant definitions of Directive (2009/28/EC) must be applied: <ul style="list-style-type: none"> ○ "ligno-cellulosic material" ○ "non-food cellulosic material" 	n/a	SSAP/RED Protocol <ul style="list-style-type: none"> • Introduction and Scope • Scope: • The applicable feedstock is soybeans cultivated in the United States for the production of biodiesel in the

			<p>European Union. Soybean waste and residual streams are excluded. This scheme does not include ligno-cellulosic and non-food cellulosic material. The Chain of Custody coverage is the cultivation stage and transport to the First Gathering Point only, without having an option for individual farm or farm group certification. Both soybean processing steps, and the use of waste/residues is not covered in this scheme.</p>
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Recognition of other voluntary schemes and national systems

Recognition of other voluntary schemes		
Requirement	Guidance	Assessment
5.6 Approach to voluntary scheme recognition (OPTIONAL: Voluntary schemes are encouraged to include a clause on recognising the potential use of other voluntary schemes for part of a supply chain)	<ul style="list-style-type: none"> In case part of the chain relies on other voluntary schemes, schemes may only recognise voluntary schemes that are recognised by the Commission in the context of the Directive 2009/28/EC. Schemes may only recognise the <i>scope</i> of the voluntary scheme that the EC recognises in this context. 	<p>Y SSAP/RED Protocol</p> <ul style="list-style-type: none"> 6. Recognition of other RED schemes SSAP/RED is a scheme that is focusing on soybeans from U.S. origin. In case U.S. soybeans are bought with a claim of another RED voluntary scheme recognized and approved by the European Commission under the Directive 2009/28/EC which includes all SSAP/RED scope elements of this protocol (e.g. soybeans from U.S. origin), and sold by companies operating under SSAP/RED, it is allowed to use the RED compliant claim. It is explicitly not allowed to: <ul style="list-style-type: none"> Bring other feedstocks than soybean under the scope of SSAP/RED Import soybeans from outside to the U.S. (with another RED claim) and sell those soybeans with a SSAP/RED claim.

5.7 Recognition of national schemes	<ul style="list-style-type: none"> The Commission may recognise national schemes for compliance with the conditions set out in Directive 2009/28/EC. Voluntary schemes shall not refuse mutual recognition with those schemes as regards the verification of compliance with the sustainability criteria set out in Articles 17(2) to (5). 	n/a	
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Audit Quality and Scheme Governance

Assessment of the audit processes of a voluntary scheme is relevant for auditing of the sustainability criteria and auditing of the chain of custody. The level of complexity of a chain of custody is a function of the features that a scheme allows.

RED Article 18(3):

Member States shall take measures to ensure that economic operators submit reliable information and make available to the Member State, on request, the data that were used to develop the information. Member States shall require economic operators to arrange for an adequate standard of independent auditing of the information submitted, and to provide evidence that this has been done. The auditing shall verify that the systems used by economic operators are accurate, reliable and protected against fraud. It shall evaluate the frequency and methodology of sampling and the robustness of the data.

RED Article 18(5):

The Commission shall adopt decisions only if the scheme in question meets adequate standards of reliability, transparency and independent auditing.

Article 18(3): Adequate standard of independent auditing	Voluntary Schemes need to ensure a sufficient quality of auditing and verification	
Requirements	Guidance	Assessment
6.1. Documentation management	<ul style="list-style-type: none"> The system ensures that economic operators must have a documentation management system. It should be a condition of participation in voluntary schemes that economic operators: <ul style="list-style-type: none"> i) have an auditable system for the 	<div>Y</div> SSAP/RED Protocol <ul style="list-style-type: none"> 2. Chain of Custody The chain of custody consists of the following supply chain elements: <ul style="list-style-type: none"> a. Farmer – compliance with self-assessment and self-declaration

	<p>evidence related to the claims they make or rely on;</p> <p>ii) keep any evidence for a minimum of 5 years; and</p> <p>iii) accept responsibility for preparing any information related to the auditing of such evidence.</p> <ul style="list-style-type: none"> The auditable system should normally be a quality system drawing on points 2 and 5.2 of Module D1 ('Quality assurance of the production process') of Annex II of the Decision on a common framework for the marketing of products. 	<ul style="list-style-type: none"> Each farmer that supplies under the SSAP/RED Protocol has to execute a self-assessment and sign a self-declaration, confirming his compliance with the sustainability requirements of this protocol. [...] Farmers must maintain all relevant documents, including self-declarations, delivery notes and Conservation Plans, for at least five years and need to make this available during an audit (their signature on the self-declaration confirms their commitment to this obligation). To demonstrate compliance with the land-related sustainability criteria specified in section 1 of the SSAP RED Protocol, farmers supplying an elevator/FGP must be located in areas that are near each other and have similar characteristics. b. The First Gathering Point (FGP)- first certified entity in the supply chain SSAP/RED considers the FGP as the first SSAP/RED certified entity in the supply chain. [...] The FGP needs a documentation management system that provides the following aspects, in such a way that they are auditable: <ul style="list-style-type: none"> SSAP/RED scope certificate or scope certificate of other RED voluntary scheme (if they have other than SSAP/RED); Make available to the auditors all relevant information, including the mass balance data and the auditing reports from other RED voluntary scheme certifications;
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			<ul style="list-style-type: none"> ○ Assurance mechanism and procedure that the same soybeans do not get marketed twice as RED compliant, or if farmers supply twice under different voluntary schemes; ○ List of all farms supplying soybean including, at least the full names and addresses of the farms; ○ Self-declarations of farms delivering soybeans for the respective certification period. At the date of the audit at least one self-declaration must be in place; ○ Certificate numbers, the name of certification scheme (SSAP/RED, or reference to other RED program); ○ List of all storage facilities acting on behalf of the first gathering point with names and addresses ○ Contracts with all Elevators/storage facilities which include their confirmation to relevant obligations to compliance with this protocol; ○ Quantity bookkeeping: If elevators/dependent storage facilities are used, individual quantity bookkeeping is necessary for each storage facility, this is further explained in chapter 3 of this protocol; ○ The FGP will maintain a documentation management system that ensures transparency and commercial viability; and prevents double counting of SSAP/RED, or
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			<p>another EU recognized voluntary scheme, claims.</p> <ul style="list-style-type: none"> • The FGP will maintain all documents for five years. • c. Trader – certified entity after the FGP • [...] The Trader needs a documentation management system that provides the following aspects, in such a way that they are auditable: [...] • The trader will maintain all documents for no less than five years. • d. Elevators – operating under the scope of a certified FGP • The elevator needs to have a management system in place to record incoming and outgoing delivery notes, based on which the FGP can operate the mass balance system for the product with an SSAP/RED compliant claim. Further requirements for elevators operating in the scope of a certified FGP are set in "SSAP/RED Requirements for elevators operating under the scope of certified FGPs". These requirements recognise a different process of implementation for elevators in case they are owned or not owned by the company certified as FGP. Individual certification of the elevator, then becoming the certified FGP, is voluntary under SSAP/RED. Delivery notes should at least contain information on the type of product, quantity, and delivery or dispatch date. [...] • The elevator will maintain documents for at least five years and in a format available for auditing purposes.
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			<ul style="list-style-type: none"> • e. Storage locations – operating under the scope of a certified Trader • The storage location needs to have a management system in place to record incoming and outgoing delivery notes, based on which the Trader can operate the mass balance system for the product with an SSAP/RED compliant claim. Delivery notes should at least contain information on the type of product, quantity, and delivery or dispatch date. In order to determine the quantity upon delivery and dispatch, the storage location needs to have access to an independently calibrated weighbridge. The storage location is obliged to provide above documentations and give insight in its management system (which must be covered in its contract or other written confirmation with the Certified FGP) when requested by the SSAP/RED auditor. • Documentation on above chain of custody requirements needs to be maintained for at least five years and in a format available for auditing purposes.
6.2 Audits before participation in the voluntary scheme	<ul style="list-style-type: none"> • As a general rule, a voluntary scheme should ensure that economic operators are audited before allowing them to participate in the scheme. • [The requirements for auditor competency are covered separately under requirement 6.5 below.] 	Y	<p>Governance Structure</p> <ul style="list-style-type: none"> • 4. Self-Assessment and internal audit • Farmers • The SSAP/RED can only be applied by farmers participating in the U.S. national SSAP program and maintaining the qualification for the program, in the respective year of applying for the SSAP/RED.

		<ul style="list-style-type: none"> • The participating farmer will duly execute a self-assessment and fill in the self-assessment and present this document to the requesting First Gathering Point ('FGP'). Subsequently the Certification body will verify whether the submitted data are correct or not. Therefore, a two staged process will apply. • Initially, the CB will conduct a risk assessment to evaluate the potential level of compliance, i.e. based on available information (satellite imagery starting 1 January 2008, USDA/NRCS data, other publicly available data etc.) The CB evaluates the risk that the farmers within the sourcing region of the FGP are not compliant with the requirements of the SSAP/RED. • As a second stage, based on the outcome of the risk assessment, the CB will decide on the sampling size and whether it is sufficient to conduct a remote verification or whether on site visits of soy farmers are required. • First Gathering Points (FGPs) • FGPs have the following obligations in order to prove they manage compliance to sustainability requirements of the SSAP/RED: • Before accepting a farmer as an SSAP/RED compliant supplier, the FGP shall check if the farmer provided a self-declaration, signed latest on the date of physical dispatch of the soy and confirm correctness of the declaration, for which satellite imagery starting 1 January 2008 from the USDA and NRCS may be used.
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		<ul style="list-style-type: none"> • The FGP shall have a monitoring system in place that includes at least one self-assessment (internal audit) per year. This self-assessment shall check if the FGP, the elevators used and the supplying farmers all comply to the SSAP/RED Protocol. The assessment shall include: <ul style="list-style-type: none"> ○ Check on availability and validity of contracts and self-declarations; ○ Check on availability, correctness and completeness of delivery notes and sustainability declarations, and if reported amounts on these two documents match with each other; ○ Check if mass-balance calculation rules are followed in line with chapter 3 of the protocol ○ Check if all other requirements of their internal management system related to SSAP/RED compliance are implemented accordingly • Traders • Traders have the following obligations in order to proof they manage compliance to sustainability requirements of the SSAP/RED: • Before accepting a batch as SSAP/RED compliant the FGP shall check <ul style="list-style-type: none"> ○ if the supplier (FGP or other trader) had a valid SSAP/RED certificate on the date of physical dispatch of the soy;
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			<ul style="list-style-type: none"> ○ if the delivery note and the sustainability declaration are available, correct and complete. • The Trader shall have a monitoring system in place that includes at least one self-assessment (internal audit) per year. This self-assessment shall check if the trader and the elevators used all comply to the SSAP/RED Protocol. The assessment shall include: <ul style="list-style-type: none"> ○ Check on availability and validity of contracts and sustainability declarations; ○ Check on availability, correctness and completeness of delivery notes and sustainability declarations, and if reported amounts on these two documents match with each other; ○ Check if mass-balance calculation rules are followed in line with chapter 3 of the protocol; ○ Check if all other requirements of their internal management system related to SSAP/RED compliance are implemented accordingly. • 5. Verification Process • The verification process for compliance against the SSAP/RED is focused on companies that buy the soybeans from the farmers and facilitate the export to the EU. These companies are referred to as First Gathering Points (FGPs) and Traders. The procedures in this chapter apply to initial certification audits as well as annual recertification audits, which cover
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			<p>retrospective auditing of claims made under SSAP/RED. FGPs are responsible for compliance against the SSAP/RED Protocol, which includes coordinating the execution of farmers' self-assessment on sustainability requirements, receiving their signed self-declarations and checking on correctness of those. They shall also assure compliance with all the traceability and GHG emission requirements in the protocol. Compliance will be verified by an independent CB. The following steps are required:</p> <ul style="list-style-type: none"> • Risk management/Limited assurance level: [Refer to requirement 6.9 below.] • Execution of a risk assessment prior to the audit, taking into account: [Refer to requirement 6.6 below.] • Execution of the audit: After a successful initial audit, the Certified Main Entity receives a SSAP/RED scope certificate, which provides the right to export soy with a SSAP/RED compliant claim. The scope certificate will have a validity of one year. Annual re-certification audits will take place to monitor compliance with the SSAP/RED requirements. When compliance is proven, the certificate will be renewed for another year. Chapter 9 of this document gives further explanation in the case of occurrence of non-conformities. During the onsite audit at the Certified Main Entity, the auditor will check if the management system meets the requirements and all requirements are implemented correctly. The auditor needs at a
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			<p>minimum confirmation that all supplying farmers have a filed self-declaration, and that all applicable deliveries have sustainability documents. Checking completeness of the documents will be done based on the above explained sampling procedure.</p> <ul style="list-style-type: none"> • Issuance of the SSAP/RED scope certificate: After a successful audit and internal review process from the CB, a SSAP/RED scope certificate will be issued. The scope certificate gives the Certified Main Entity the possibility to make claims on outgoing soy batches from the validity start date of the certificate until the expiry date. This means the Certified Main Entity is enabled to issue a sustainability declaration to the receiver proving compliance with SSAP/RED and providing all relevant data for all SSAP/RED compliant batches. <p>SSAP/RED Protocol</p> <ul style="list-style-type: none"> • Annex I Glossary • Crop reporting District: This is the regional administrative office at county level in the U.S.. Data from crop reporting districts can be helpful to cross check compliance of farmers in the area against specific SSAP/RED requirements. • Certificate Holder: The legal entity responsible for making an SSAP/RED compliant claim on soybean needs to be certificate holder of a valid SSAP/RED scope certificate. This certificate confirms the legal entity has procedures and system in place for correct
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			<p>implementation of SSAP/RED requirements. The document also assures buyers that the legal entity is able to sell them the soybean with a RED compliant claim.</p> <ul style="list-style-type: none"> • Certificate Scopes: Each SSAP/RED scope certificate mentions the certification scope of the legal entity, which describes the activities of the company. SSAP/RED has defined 2 different scopes: <ul style="list-style-type: none"> ○ First Gathering Point (FGP) – buying material based on farmer self-assessment, selling material with a SSAP/RED compliant claim. ○ Trader – buying and selling material with a SSAP/RED compliant claim. • Certified Main Entity: This is the company that applies for SSAP/RED certification, acting either as certified FGP or Trader. The certified FGP can include Elevators and Farms in its certification scope. The certified Trader can only buy material from certified FGPs and can have Storage locations in its scope. • Elevator: The elevator acts as the first physical collection point and storage location of the Soybean. It will act as the first mass-balance location in the SSAP/RED supply chain. Administration responsibility of the mass balance location is with the certified legal entity (e.g. FGP), administration should always be linked to information collected at the elevator. The elevator may take up delegated tasks from the FGP, such as the collection of self-declarations to the
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			<p>elevator, but the FGP remains responsible for the internal monitoring system.</p> <ul style="list-style-type: none"> • FGP (First Gathering Point): This is the first SSAP/RED certified entity in the supply chain, normally the soybean exporter. This entity is buying soybean and receives Self-declarations from the farmers that produced the soy. The entity is certified and can therefore bring the soybean to the market with a SSAP/RED compliant claim. The FGP may delegate execution of tasks to soy elevators or crop reporting districts, but it remains responsible for correct implementation of SSAP/RED requirements. Examples of delegated tasks to elevators could be the collection of self-declarations of farmers, and manage the system that stores transport documents. Examples of delegated tasks to crop reporting districts could be providing (historical) data on compliance of sustainability requirements in the district. • Self-Declaration: This is the document that shall be filled out and signed by the farmer representing the trading entity of the farm. The document confirms the soybean are grown in compliance with the SSAP/RED requirements. The declaration also confirms that the farmer accepts additional evidence requests and/or onsite audits. • Verification / 3rd party Assessment: All SSAP/RED certified legal entities (e.g. FGPs, traders) are subject to an annual 3rd party assessment that will verify if they act in compliance with the SSAP/RED
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			<p>requirements. After a completed verification without unsolved non-conformities, the legal entity receives a SSAP/RED scope certificate.</p> <p>SSAP/RED Requirements for elevators operating under the scope of certified First Gathering Points (FGP)</p> <ul style="list-style-type: none"> • This document is designed to assure obligations of elevators that act as a “dependant storage location” under the scope of a SSAP/RED certified FGP. It assures contractual confirmation of the elevator towards the FGP, for meeting all obligations related to traceability and supply chain transparency, which the certified FGP has to provide for compliance against SSAP/RED. The contract gives the FGP the right to demand SSAP/RED compliance of elevators who have agreed to provide SSAP/RED compliant soybeans. These requirements can be implemented in two ways: • 1) Elevators owned and under the same management of the FGP • For all elevators operating under the FGP scope that are owned by the same company, the items below should be addressed in the quality management system and it should be proven that responsible staff of the certified FGP have control over this process at the other locations. • 2) Elevators not owned or under the same management of the FGP • For all elevators who are not owned by the same company as the FGP (external elevators), the elevator
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			<p>obligations must be part of the supply contract between the certified FGP and the elevator. Elevators that do not wish to agree on below terms can use the voluntary option to go for their own FGP certificate.</p> <ul style="list-style-type: none"> • The elevator is obliged to: [...] • The certified FGP is obliged to: [...]
6.3 Retrospective audits	<ul style="list-style-type: none"> • The voluntary scheme shall arrange for regular, at least yearly, retrospective auditing of a sample of claims made under the scheme. It is the responsibility of the verifiers to define the size of the sample that will permit them to reach the level of confidence necessary to issue a verification statement. • [The requirements for auditor competency are covered separately under requirement 6.5 below.] 	Y	<ul style="list-style-type: none"> • [The SSAP scheme requirements detailed above in 6.2 are also applicable to this section, but have not been replicated here.]
6.4 Group auditing [OPTIONAL – only relevant when group auditing is applied]	<ul style="list-style-type: none"> • Group auditing - in particular for smallholder farmers, producer organisations and cooperatives - can be performed. [Note that group auditing is only permitted for the producers of raw material, not other economic operators further down the supply chain.] • In such cases, verification for all units concerned can be performed based on a sample of units, where appropriate 	n/a	<p>SSAP RED Protocol</p> <ul style="list-style-type: none"> • Annex I Glossary • Producers: This term is not referring to a group of farmers associated with each other as a group or managed by a group manager, but merely referring to a multitude of single farmers operating independent from each other. The SSAP/RED Protocol does not include farm group auditing and certification, as farmer compliance is covered as part of the scope of the FGP audit.

	<p>taking into account a relevant standard developed for this purpose. Aspects that should be covered include the following:</p> <ul style="list-style-type: none"> ○ What is the sample size and how is the sample determined? ○ What is the threshold for non-compliance and do they apply to the whole group? <ul style="list-style-type: none"> • As a minimum, it is required that a sample of at least the square root of the number of group members is audited individually annually, in line with the ISEAL standard P035. • It is generally expected that group auditing is undertaken on-site (e.g. that auditors visit the individual farms where the feedstock is produced). If the application of desk audits is allowed voluntary schemes must provide guidance to the auditors under which circumstances such desk audits could be considered to provide the same level of assurance as an on-site audit (e.g. availability of high quality satellite images, data on protected areas and peatland that provide information on the relevant time horizon). For example: <ul style="list-style-type: none"> ○ Criteria should be set out how the general level of risk in the 		
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	<p>areas can be determined and which consequences the level of risk has got for the auditing approach.</p> <ul style="list-style-type: none"> ○ What type of evidence needs to be available to allow desk audits. In this context self-declarations from economic operators cannot be regarded as sufficient evidence. • Group auditing for compliance with the scheme's land related criteria is only acceptable when the areas concerned are near each other and have similar characteristics. • Group auditing for the purpose of calculating GHG savings is only acceptable when the units have similar production systems and products. 		
6.5 Auditor competencies	<ul style="list-style-type: none"> • For these audits, requirements are that the auditor should be: <ol style="list-style-type: none"> 1. Independent of the activity being audited 2. Free from conflict of interest 3. Competent <ul style="list-style-type: none"> ○ Point 1 and 2 mean that the audit shall be carried out by an external 	Y	<p>Governance Structure</p> <ul style="list-style-type: none"> • 11. Approval procedure for 3rd Party Certification bodies • a. Requirements for CBs • The CB must ensure appropriate expertise and experience, both in the relevant fields of activity and for the types of auditing tasks to be executed for SSAP/RED. To assure this, the CB should be

	<p>third party (not the economic operator)</p> <ul style="list-style-type: none"> o Point 3 mean that the auditor has the generic skills and the verification body has the general skills for performing audits; and o The auditor has the appropriate specific skills necessary for conducting the audit related to the scheme's criteria. o Namely: o Land use criteria: Experience in agriculture, ecology or similar. Note that verifying compliance with the highly biodiverse grasslands criterion partially requires technical knowledge that goes beyond the competences that can be expected from the auditors verifying the claims made by market operators (e.g. assessing whether a grassland maintains the natural species composition and ecological characteristics and processes and whether grassland is species rich). o GHG criteria: Relevant experience in, agriculture, natural science, engineering (chemical, process etc), energy management or 	<p>conducting, for instance, in conformity with or according to the principles of:</p> <ul style="list-style-type: none"> o ISO/IEC 17065 establishing requirements for product certification or o ISO/IEC 17021 establishing requirements for management system certification. o Standard ISO 19011 establishing guidelines for quality and/or environmental management systems auditing. o Standard ISO/IEC Guide 60 establishing good practices for conformity assessments. o Standard ISO 14065 establishing requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition. o Standard ISO 14064-3 establishing specification with guidance for the validation and verification of greenhouse gas assertions. o Other voluntary schemes based on RED 2009/28/EC. <ul style="list-style-type: none"> • Chapter 6 of this documents gives guidance to the CB on how to use the SSAP/RED system documents in assuring comprehensive audit execution. • b) Auditor competences • The CB must assure the following requirements to the auditors: <ul style="list-style-type: none"> o Independence of the auditor towards the activities to be audited o Assurance of absence of conflict of interest
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	<p>similar depending on the type of audits to be conducted by the individual auditor.</p> <ul style="list-style-type: none"> o Chain of Custody system: Experience in mass balance systems, supply chain logistics, traceability, data handling or similar. • The scheme documentation should describe in sufficient detail how it is ensured that the requirements concerning auditors' competences are met. 		<ul style="list-style-type: none"> • The CB must maintain appropriate records of the education, training, skills and experience of each auditor that is working for the CB to execute assessments for SSAP/RED. Prior to the audits, the auditors will receive training specific to the requirements of the RED, and specific scheme requirements of the SSAP/RED Protocol. It is allowed to align these competence records with systems in place for other RED voluntary schemes. This has to include: <ul style="list-style-type: none"> o Proven understanding and experience in implementing the audit process as specified in ISO 19011; o Proven training and experiences in agricultural and/or forestry related industries o Proven training and experience in auditing o Specific reference to training on (changes within) the SSAP/RED Protocol; o All SSAP/RED auditors are required to adhere to specific auditor trainings and updates from SES.
6.6 Management of the audit	<ul style="list-style-type: none"> • Audits shall be properly planned, conducted and reported on. • The scheme has clear procedures that describe how audits should be conducted, including detailed guidelines or checklists for auditors. 	Y	<p>SSAP/RED Protocol</p> <ul style="list-style-type: none"> • 4. Risk Assessment and Mitigation • The SSAP/RED is only applicable to soybeans with a U.S. origin. Therefore, this section sets out a list of U.S. specific aspects to be taken into account by the SSAP/RED 3rd party auditor. All items refer specifically to U.S. based regulators and control bodies, that verify

	<ul style="list-style-type: none"> • The guidelines shall also set out the content of the auditing reports e.g. beginning and the end of the audit (length of the audit), the address where the audit was conducted, the audit participants and a list of audited documents. Further, the guidelines shall determine the necessary information to be included on the certificates (e.g. type of biomass and scope of certificate). • Audit includes the following: <ul style="list-style-type: none"> ◦ Identify the activities undertaken by the economic operator which are relevant to the scheme's criteria; ◦ Identify the relevant systems of the economic operator and its overall organisation with respect to the scheme's criteria and checks the effective implementation of relevant control systems; ◦ Analyse the risks which could lead to a material misstatement, based on the verifier's professional knowledge and the information submitted by the economic operator; ◦ Draw up a verification plan which corresponds to the risk analysis and the scope and complexity of the 		<p>compliance with requirements relevant to the RED. Those aspects can therefore contribute to the risk assessment, when the data referred to is made available to the auditor. More information on applicable U.S. laws can be found in Annex II of this document.</p> <ul style="list-style-type: none"> • Soybean producers file annually form AD-1026 (Conservation Plan), self-certifying compliance with all U.S. land use and conservation regulations. Forms AD-1026 are subject to random auditing by the Natural Resources Conservation Service (NRCS). • Annual data collection and analysis of satellite imagery will confirm compliance with the land use requirements of the RED. [...] • Complexity of the audited system user should be checked, based on the following indicators <ul style="list-style-type: none"> ◦ Amount of farmers and their spread in size, homogeneity, spread over different regulatory areas, risk of non-compliance to the key RED sustainability requirements as in RED Article 17 ◦ Amount of elevators and level of proof of control of the operations on these locations with regard to SSAP/RED sustainability requirements by the FGP or Trader audited ◦ Present or past participation of the system user or any of its farmers or elevators • Transparency on other voluntary scheme participation [See requirement 6.7 below].
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	<p>economic operator's activities, and which defines the sampling methods to be used with respect to that operator's activities;</p> <ul style="list-style-type: none"> ○ Carry out the verification plan by gathering evidence in accordance with the defined sampling methods, plus all relevant additional evidence, upon which the verifier's verification conclusion will be based; ○ Request the operator to provide any missing elements of audit trails, explain variations, or revise claims or calculations, before reaching a final verification conclusion. <ul style="list-style-type: none"> • ISO 19011: 2011 (plan, do, act, check), or justified equivalent, covers the above requirements. • The voluntary scheme should also describe what the implications are for any non-conformities identified during the audit. For example: <ul style="list-style-type: none"> ○ Under which circumstances are certificates withdrawn or suspended? ○ What procedures are in place to ensure that any non-conformities 		<ul style="list-style-type: none"> • Rigourness of the internal audit procedures and execution of the SSAP/RED system user with respect to all above mentioned risk indicators, but specifically related to key sustainability requirements of RED Article 17. <p>Governance Structure</p> <ul style="list-style-type: none"> • 4. Self-Assessment • Farmers • The SSAP/RED can only be applied by farmers participating in the U.S. national SSAP program and maintaining the qualification for the program, in the respective year of applying for the SSAP/RED. • The participating farmer will duly fill in the self-assessment and present this document to the requesting First Gathering Point ('FGP'). Subsequently the Certification body will verify whether the submitted data are correct or not. Therefore a two staged process will apply. • Initially, the CB will conduct a risk assessment to evaluate the potential level of compliance, i.e. based on available information (satellite imagery starting 1 January 2008, USDA/NRCS data, other publicly available data etc.) The CB evaluates the risk that the farmers within the sourcing region of the FGP are not compliant with the requirements of the SSAP/RED. • As a second stage, based on the outcome of the risk assessment the CB will decide on the sampling size and whether it is sufficient to conduct a remote
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	<p>that do not lead to immediate withdrawal or suspension of the certificate are corrected?</p>		<p>verification or whether on site visits of soy farmers are required. [Refer to requirement 6.9 below.]</p> <ul style="list-style-type: none"> • 5. Verification Process • Compliance will be verified by an independent CB. The following steps are required: [...] • Execution of a risk assessment prior to the audit, taking into account: <ul style="list-style-type: none"> ○ Information on the location of the suppliers and regional compliance to SSAP/RED sustainability requirements, to be provided by the Certified Main Entity. ○ Quality of the land-use data available. ○ Consideration of farmers' potential weaknesses through the FGP internal monitoring process or the review of other relevant documented evidence (with consideration to the presence of protected areas designated under U.S. law, forested areas, wetlands or peatlands. ○ If available: reports on previous verifications on SSAP/RED or other assessments related to RED compliance. ○ Compliance level to all points listed in chapter 4 of the SSAP/RED Protocol with specific consideration given to identified non-compliance on previous audits. ○ Other aspects, including: quality of the management system (structure and documentation, completeness of records),
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			<p>information relating to the FGP's internal audits, and other aspects as determined by the auditors.</p> <ul style="list-style-type: none"> ○ Clarity on ownership structure of participating elevators and implementation on relevant requirements, laid down in "SSAP/RED Requirements for elevators operating under the scope of certified FGPs" <ul style="list-style-type: none"> • The risk assessment should result in a risk classification: • Reduced risk • The Certified Main Entity has proven to have a supply base that has compliance with the SSAP/RED sustainability requirements, there is a reduced risk to find major or critical major non-conformities. Companies with reduced risk classification are likely to have a shorter audit as the external auditor may rely more on the internal management system of the Certified Main Entity. Traceability data on deliveries from the farmers and inventories of elevators/storage locations may be cross-checked remotely when information can be provided in digital format effectively. In the FGP audit, a square root (rounded up) of the farmers' documents need to be checked by the auditor (e.g. delivery documents and self-declarations). Furthermore, the auditor has to confirm that the FGP acceptance and monitoring process for its supplying farmers indeed assures farmer compliance. When necessary the auditor might perform parallel
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			<p>checks for additional assurance. The quantities listed on the documents need to be cross checked with the amount of soy actually supplied and the amount of soy in the mass balance documentation of the FGP. The same procedure applies for a square root (rounded up) of all elevator/storage locations locations that applies to all Certified Main Entities. The auditor needs to check their inventory lists for a cross check with mass balance books of the Certified Main Entity.</p> <ul style="list-style-type: none"> • Medium risk • In case the information provided by the Certified Main Entity prior to the audit is not fully clear or complete, or a limited number of points from chapter 4 of the SSAP/RED Protocol could not be checked prior to or at the moment of the onsite audit, this will result in a medium risk classification. The onsite audit of the Certified Main Entity is likely to take longer as clarification on incomplete information from the assessment have to be clarified. Chain of custody data on deliveries from the farmers and inventories of elevators/storage locations need to be cross-checked on-site on those locations on a sample basis but including a full month of deliveries. A square root (rounded up) of the farmers need to be visited to confirm compliance with the sustainability requirements and to cross-check feasibility of the amount of soy production area with delivery documents. Next to that, a cross-check has to be made between amounts of soy supplied versus amount of
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			<p>soy in the mass balance documentation of the FGP. A square root (rounded up) of all elevators need to be visited to confirm inventory administration as a cross check with mass balance books of the Certified Main Entity.</p> <ul style="list-style-type: none"> • High risk • In case the information provided by the Certified Main Entity prior to the audit is not clear or not available (timely), assurance of compliance to sustainability requirements is limited, and if multiple points of chapter 4 of the SSAP/RED Protocol could not be checked prior to or at the moment of the onsite audit, this will result in a high risk classification, this will result in a high risk classification. Companies with high risk classification require an onsite audit at the operational location of the Certified Main Entity with a full document check. For companies already certified, documentation of all batches has to be checked, which very likely will result in a significantly longer audit process. Traceability data on deliveries from the farmers and inventories of elevators/storage locations need to be cross-checked on-site on those locations. A square root (rounded up) multiplied by a factor of at least 2 of the farmers need to be visited to confirm compliance with the sustainability requirements and to cross-check feasibility of the amount of soy production area with delivery documents. Next to that, a cross-check has to be made between amounts of soybean supplied versus amount of soybean in the mass
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		<p>balance documentation of the FGP. A square root multiplied by 2 (rounded up) of all elevators/storage locations need to be visited to confirm inventory administration as a cross check with mass balance books of the Certified Main Entity.</p> <ul style="list-style-type: none"> • Sampling procedure • For all above risk classifications, remote or onsite sampling in the supply chain is required to cross-check accuracy of documentation available at the Certified Main Entity. Depending on the risk classification, sampling can be done remote or onsite, and sample size is square root or square root multiplied by 2. Table 1 gives further clarification. [...] When the results of the risk assessment result in compliance doubts for specific farmers or storage locations, samples shall be chosen with a risk based approach to be able to confirm compliance on soy production and/or handling from the specific sites where risks were identified. For the reduced risk classification, remote sampling can be selected randomly. • 6. Scheme Documents and Public Consultation • [...] To be able to conduct the audits, the SSAP/RED Protocol is transformed in an audit procedure, consisting of a report template with a checklist where findings of compliance and non-compliance can be included. This checklist will be the base to be able to take certification decisions of scope certificates of FGPs. • 9. Non-conformities, observations and consequences
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		<ul style="list-style-type: none"> • 9.1 Non-conformity grading • During the SSAP/RED verification process, findings of discrepancy with the requirements can be detected in four grades, as defined below: • Observations are findings that do not affect the performance yet, but may result in errors that result in a future non-conformity. Follow up is not mandatory, but recommended; • Minor non-conformities are findings that do not adversely affect the performance, reliability and integrity of compliance with SSAP/RED and which can be corrected without any effect on further incorrectness in the supply chain; • Major non-conformities are findings that may significantly affect the performance, reliability and integrity of compliance with SSAP/RED, which can no longer be corrected after the assessment and are not critical. This would include errors in claims made on sustainability declarations, which therefore effect correctness of claims downstream in the supply chain without risk that non-sustainable material entered in the supply chain; • Critical major non-conformities are findings that result in a critical aspects of the scheme, and a clear risk to the integrity of SSAP/RED and the core essence of its requirements that cannot be corrected. Examples could be violation with sustainability requirements of the land where the soy is produced, or proof of intentional fraud by the audited company.
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		<ul style="list-style-type: none"> • 9.2 Non-conformity resolution timelines • [...] Minor non-conformities need to be resolved within 60 days or before expiry of the scope certificate (if that date is earlier) but without a detailed corrective and preventive action plan, as there was no effect on further incorrectness in the supply chain. Effectiveness on preventing the same error will be checked in next years audit. • Major non-conformities need to be resolved within 60 days or before expiry of the scope certificate (if that date is earlier) and including a detailed corrective and preventive action plan. [...] Depending on speed and accuracy of the resolution of the non-conformity by the FGP or trader, the closing decision might include an increase of the risk level for next recertification audit. Effectiveness on preventing the same error will be checked in the next recertification audit. When the system user does not close the non-conformity timely and still has a valid certificate after 60 days, the certificate will be suspended. • After detecting a critical major non-conformity at a currently certified SSAP/RED system user, their certificate will be suspended until the non-conformity is closed, meaning the company cannot sell any other material with a SSAP/RED sustainability claim. Resolving critical non-conformities has to be done within 30 days after detection. For initial certification audits, critical major non-conformities related to sustainability requirements can only be solved by
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			<p>limiting the sourcing area (e.g. excluding non-compliant farmers). In case of detection of intentional fraud this will result in a suspension period of the company and in the worst case exclusion of further participation in the SSAP/RED scheme. The resolution process needs to be finished within 60 days, otherwise the certificate will be withdrawn with a suspension period. For all other aspects, the resolution procedure is the same as described for major non-conformities.</p> <ul style="list-style-type: none"> • Certificates can only be issued after closure of all non-conformities. In case of major or critical major non-conformities occur with SSAP/RED system users that are already certified, a consequence could be to withdraw the certificate. Re-issuing certificates can only be done when the finding is fully solved and re-occurrence of the finding is proven to be prevented. In case of Critical major non-conformities a suspension period can be defined up to 5 years depending on severity of the findings. [...] Re-issuance of the certificate is only likely when uncompliant sourcing areas are excluded, or when clear measures have been taken to prevent fraudulence acting.
6.7 Transparency on other voluntary scheme participation by economic operators	<ul style="list-style-type: none"> • Voluntary schemes need to ensure that economic operators declare the names of all schemes they participate in and make available to the auditors all relevant information, including the mass balance data and the auditing reports. 	Y	<p>SSAP/RED Protocol</p> <ul style="list-style-type: none"> • 2. Chain of Custody • b. The First Gathering Point (FGP)- first certified entity in the supply chain

	<ul style="list-style-type: none"> • Prior to re-certification of an economic operator that was previously found to be in major non-conformity with this requirement, or any other aspect of the mandatory sustainability criteria, the auditor should be required to bring this to the attention of the voluntary scheme under which the operator is in the process of re-certification. (This requirement applies to all voluntary schemes that the economic operator is participating in.) 		<ul style="list-style-type: none"> • The FGP needs a documentation management system that provides the following aspects, in such a way that they are auditable: [...] • make available to the auditors all relevant information, including the mass balance data and the auditing reports from other RED voluntary scheme certifications • c. Trader – certified entity after the FGP • make available to the auditors all relevant information, including the mass balance data and the auditing reports from other RED voluntary scheme certifications • 4. Risk Assessment and Mitigation • Transparency on other voluntary scheme participation <ul style="list-style-type: none"> ◦ All SSAP/RED system users need to declare the names of all voluntary schemes approved by the European Commission under the Directive 2009/28/EC they have or have been participating in. ◦ If the system user is using multiple schemes, the audit findings of these schemes need to be available prior to the onsite audit of the SSAP system user the risk assessment of the SSAP/RED audit. The risk level of the SSAP/RED will at a minimum be the same as the highest risk level of the other schemes and extra. ◦ During the onsite audit, the auditor needs to have access to the full mass-balance to also check double claiming of the same soy under the different voluntary schemes.
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			<ul style="list-style-type: none"> ○ If the system user has failed previous audits under other voluntary schemes but successfully passed the SSAP/RED audit, the SSAP/RED certification body shall inform all other voluntary schemes the system user has or has been operating prior to issuance of the certificate. • 9. Non-conformities, observations and consequences • 9.2 Non-conformity resolution timelines • [...] If an operator participates in EU recognized RED voluntary schemes and is found to be in major non-compliance, prior to re-certification, the SSAP/RED CB who detected these audit findings will share them with all other voluntary schemes in which the operator is participating. • 10. Transparency on other voluntary scheme participation by economic operators • The SSAP/RED scheme recognizes importance of transparency with other RED voluntary schemes, to prevent system users from hopping between schemes with the aim to prevent detection or consequences of major and critical major non conformities. Therefore, SSAP/RED system users are obliged to declare current and past participation in other schemes and to share their most recent audit details. In case of failed audits with other schemes, a SSAP/RED scope certificate can only be issued after informing the relevant other voluntary schemes. More specific requirements can be found in chapter 4 of the SSAP/RED Protocol.
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<p>6.8 Specific aspects relevant for audits of actual GHG emission calculations</p>	<ul style="list-style-type: none"> • The voluntary scheme is required to ensure that economic operators make available to auditors all relevant information concerning the calculation of actual GHG emissions in advance of the planned audit. The auditor should record the emissions occurring at the audited site (emissions after allocation) and if relevant the achieved savings in the audit report. Should the emissions deviate significantly from typical values the report has to include information that explains the deviation. • The voluntary scheme shall ensure that economic operators are only allowed to use actual values after the capability to conduct such a calculation according to the GHG emission calculation methodology has been verified by an auditor. Such a verification can be performed during the audit of the economic operator before participation in the voluntary scheme (see requirement 6.2. above) • Carbon capture and replacement: Auditors are required to verify that the estimate of emissions saving from capture and replacement of CO₂ is limited to emissions avoided through the 	<p>n/a.</p>	<p>[This requirement has been scored as "n/a" on the basis that the GHG emission calculation methodology in the SSAP scheme is based on aggregated data and not actual (measured) values calculated by economic operators. Specific requirements would need to be covered by SSAP if the intention is to allow actual value calculations.]</p>
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	<p>capture of CO₂ of which the carbon originates from biomass and which is used to replace fossil-derived CO₂. This requires access to the following information:</p> <ul style="list-style-type: none"> ○ The purpose for which the captured CO₂ is used. ○ The origin of the CO₂ that is replaced. ○ The origin of the CO₂ that is captured. ○ Information on emissions due to capturing and processing of CO₂. <p>To supply evidence regarding the origin of the CO₂ that is replaced, operators using the captured CO₂ should state how the CO₂ that is replaced was previously generated and declare, in writing, that due to the replacement emissions of that quantity are avoided.</p> <p>The evidence must enable auditors to verify whether the requirements of Directive 2009/28/EC are met including that emissions are actually avoided.</p> <ul style="list-style-type: none"> • Good examples for a replacement which can be expected to avoid CO₂ emissions are cases where the CO₂ that is replaced 		
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	was previously produced in a dedicated process aiming at the production of CO ₂ .		
6.9 Establishment of at least a “limited assurance level” when conducting audits	<ul style="list-style-type: none"> A “limited assurance level”² implies a reduction in risk to an acceptable level as the basis for a negative form of expression by the auditor such as “based on our assessment nothing has come to our attention to cause us to believe that there are errors in the evidence”. 	Y	<p>Governance Structure</p> <ul style="list-style-type: none"> 5. Verification Process Risk management/Limited assurance level: As part of any certification audit, auditors must carry out a risk assessment at the supply chain parts subject to the audit. The result of the risk assessment will be reflected in the audit intensity and influences the sample size as described in the next section on execution of a risk assessment. It shall be assured that a “limited assurance level” is established during the audit, taking the nature and complexity of the activities of the Certified Main Entity. This implies a reduction of risk to an acceptable level as the basis for a negative form of expression by the auditor (Source: ISAE 3000).
6.10 Accreditation of certification bodies	<ul style="list-style-type: none"> The requirements to be met by certification bodies to undertake audits on behalf of the scheme and the procedure to select or exclude certification bodies shall be described. Accreditation of certification bodies can take a number of approaches: 	Y	<p>Governance Structure</p> <ul style="list-style-type: none"> 11. Approval procedure for 3rd Party Certification bodies c. Accreditation Accreditation must be performed by a national accreditation body which is a member of the International Accreditation Forum (IAF), by the bodies

² A stronger “assurance level” is the “Reasonable assurance level”. Reasonable assurance implies a reduction in risk to an acceptably low level as the basis for a positive form of expression such as “based on our assessment, the evidence is free from material misstatement”.

	<ul style="list-style-type: none"> o Accreditation by bodies referred to in Article 4 of Regulation (EC) No 765/2008; or o Accreditation by bodies having a bilateral agreement with the European Cooperation for Accreditation; or o Accreditation by a national accreditation body affiliated to the International Accreditation Forum (IAF); or o Accreditation by a full member or 'associate' member of ISEAL; or o 'Commitment to comply' with ISO 17011: 2004 (General requirements for accreditation bodies accrediting conformity assessment bodies), or justified equivalent, within 3 years (consistent with ISEAL associate member). 		<p>referred to in Article 4 of Regulation (EC) No. 765/2008, by bodies having a bilateral agreement with the European co-operation for Accreditation (EA), or by an accreditation body which is a member (full or associate) of ISEAL.</p> <ul style="list-style-type: none"> • To assure the competences of the CB as an organization, the recognition of a CB must be performed by a competent national public authority which are officially responsible for the recognition of CBs in the framework of the RED. • d. Recognition • CBs must be recognized by a competent national public authority which are officially responsible for the recognition of CBs in the framework of the Renewable Energy Directive 2009/28/EC amended through Directive (EU) 2015/1513 (RED) and Fuel Quality Directive 2009/30/EC amended through Directive (EU) 2015/1513 (FQD)2 and according to the regulatory framework of the national transposition of the EU Directives in a Member State. Alternatively to recognition by a competent national public authority, the CB must be accredited against ISO/IEC 17065 establishing requirements for bodies operating product certification systems, done by an accreditation body as per point (c). • The CB is obliged to inform SES immediately if the accreditation or recognition is suspended, withdrawn or terminated by the accreditation body or by the competent national public authority.
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<p>6.11 Complaint procedure</p>	<ul style="list-style-type: none"> The voluntary scheme should describe how information received from third parties that is relevant for the certification is taken into account (e.g. in the planning of future audits and how requests for information, including that requests from competent authorities of EU Member States are answered). 	<p>Y</p> <p>Governance Structure</p> <ul style="list-style-type: none"> 8. Conflict Management Attention for potential conflicts in a certification scheme is an important base for its reliability, continuous improvement mechanism and transparency to its users and stakeholders. Conflict Management should always be executed close to the source of conflict as possible and with participation of the parties involved in and affected by the conflict. Before using this formal procedure, involved parties in a conflict should attempt to find a solution between each other by dialogue. If dialogue between the conflicting parties does not lead to a result, a formal procedure in accordance with the principles specified in this section can be used. Conflicts can occur on different levels, respectively between different stakeholders, organisations or individuals in relation to the procedures of the SSAP/RED voluntary scheme: Conflicts between a CB and SSAP/RED certificate holders should generally be resolved between the system user and the CB. (Such conflicts could occur when assessments results are, in the opinion of the CB, not resulting in granting a certificate, or result in withdrawing a certificate). Conflicts that arise from decisions and procedures of SES or parties/individuals appointed by SES. Conflicts brought up by stakeholders when they are affected by activities performed by SSAP/RED certificate holders, including those related to non-
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			<p>compliances with requirements and obligations of certificate holders, CBs, SES, or other related parties are resolved as described below.</p> <ul style="list-style-type: none"> • Complaints and appeals will be filed with SES when they meet the following criteria: <ul style="list-style-type: none"> ○ The reason for the complaint or appeal is substantial and non-negligible of an SSAP/RED system user, recognised CB, or addresses gaps in the effectiveness of the SSAP Protocol and/or governance, with clear reference to the parties involved. ○ The text of the complaint or appeal is addressed to the SES Management Board and secretary. • Complaints submission and processing • Complaints and appeals need to be submitted in writing and must contain basic information about the parties involved, including names of the organisations. In case the complaint is submitted anonymous a reasonable explanation should be given to justify this. The SES secretariat will acknowledge the complaint within 10 working days (e.g. confirming the complainant of reception of the complaint). The complaint resolution will be proposed within 60 working days after the acknowledgement date, unless the Secretariat has justified a longer assessment process (such as requesting response of other involved or affected parties).
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			<p>secretariat by the SES management board, the following aspects shall be taken into account:</p> <ul style="list-style-type: none"> • The parties causing the complaint to arise shall be informed on the complaint and the decision from SES on its resolution. <ul style="list-style-type: none"> ○ Resolutions of complaints addressing system users could be informing the CB to check the subject specifically in the upcoming recertification audit, or the need of an extra onsite surveillance audit to assure the integrity of the SSAP/RED system, or in severe cases, the suspension of their scope certificate. ○ Resolutions of complaints of a CB at least includes proof that the CB registers the complaint in their own complaint registration system and implements the resolution according to the decision of the SES board, or in severe cases, the suspension of the CB for executing SSAP/RED certification services. • The party filing the complaint shall be informed on the investigation process and the conclusions from the SES management board. • 10. Approval procedure for 3rd Party Certification bodies • e. Review/Internal monitoring • SES takes responsibility to review and monitor the process and documents of SSAP/RED certificate holders and CBs executing the audits and issuing the
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			certificates. Next to that, the SES secretary is always open for complaints and reports from external parties concerning the integrity of the program.
6.12 Internal monitoring	<ul style="list-style-type: none"> The voluntary scheme should have in place a system of internal monitoring to verify compliance of economic operators with the provisions of the scheme. Such internal audits should be undertaken in case relevant information on potential non-conformities has been brought to the attention of the scheme by external parties, and also to cross check the work conducted by external auditors. Internal monitoring should be undertaken on a regular basis. 	Y	<p>Governance Structure</p> <ul style="list-style-type: none"> 11. Approval procedure for 3rd Party Certification bodies e. Review/Internal monitoring SES takes responsibility to review and monitor the process and documents of SSAP/RED certificate holders and CBs executing the audits and issuing the certificates. The monitoring program consists of the following items: <ul style="list-style-type: none"> I. For each participating CB, SES is responsible to review the certification documents of the square root of audited companies on an annual basis. The review will include a consistency check on information in the certification documents, assuring that the answers given indeed confirm compliance of the corresponding requirement and a feasibility check (amount of hectares of soy in the scope vs. volume supplied). In case SES finds any issues or discrepancies, the reports will be pushed back to the CB, which will have to clarify within 15 working days. Delays in answering and/or providing incomplete answers in this timeframe can lead to suspension.

			<p>II. CBs are required to issue an evaluation report to SES on an annual basis. This report needs to include an internal evaluation of the CB related to all audits and certification decision taken, and should include an overview of all the NCs given to new and existing SSAP/RED certificate holders. SES will use this report and overview of findings as a cross check with their own monitoring of the respective CB.</p> <p>III. Complaint registrations and information received from external parties (market data) concerning the integrity of the program is collected by SES.</p> <p>IV. SES reserves the right to take action in case monitoring obligations listed in above points I to III are not met. Consequently, SES reserves the right to include internal audits at participating CBs and certificate holders. Results of such internal audits may, in case of proven poor performance, impact the certification status of certificate holders and the recognition status of the CB. SES reserves the right to suspend or exclude CBs or certificate holders in cases of proven violation of SSAP/RED requirements. [...]</p>
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6.13 Transparency	<ul style="list-style-type: none"> Voluntary schemes should make available information that is relevant for the operation of the system or for transparency purposes. This includes in particular: <ul style="list-style-type: none"> The list of economic operators that are recognised under the scheme and those who no longer participate. Information on the withdrawal or suspension of certificates must be published without delay. The latest version of scheme documents including the guidelines for audits. The certification bodies that are permitted to conduct audits and if relevant where they are accredited. Publication of contact details for the scheme e.g. telephone number, email address and correspondence address. The names of the voluntary schemes the scheme is recognising. 	Y	<p>Governance Structure</p> <ul style="list-style-type: none"> 6. Scheme Documents and Public Consultation The SSAP/RED system consists of scheme documents that contain all general requirements, processes and guidelines applicable. The SSAP/RED Protocol is considered the backbone of these documents, explaining the requirements and processes such as dealing with sustainability requirements, GHG calculation and claims, compliance and non-conformities. The protocol is supported by the farmers' self-assessment document and the requirement overview of sustainability requirements for Certified Main Entities Abovementioned documents are subject to changes, that can be incorporated at any time. Changes will always be communicated to all stakeholders by the SES secretariat, which is also open for feedback. [SSAP have issued a statement of work to an IT contractor to set up a website, which was shared as part of the technical assessment. SSAP have confirmed that all of the relevant aspects required will be incorporated in the website.]
6.14 Annual reports	<ul style="list-style-type: none"> Recognised voluntary schemes are obliged to submit annually a report to the Commission that includes relevant 	Y	<p>Governance Structure</p> <ul style="list-style-type: none"> 7. Reporting to the European Commission

	<p>information concerning the operation of the scheme.</p> <ul style="list-style-type: none"> • The scheme shall have a procedure in place to collect the information required to fulfil this reporting obligation. 	<ul style="list-style-type: none"> • SES needs to provide annual reporting to the European Commission (EC) on its activities and the status of the SSAP/RED scheme. With reference to the RED 2009/28/EC requirements on this topic, reporting to the EC includes the following subjects: [Points a to k] • The information from all above points, together with all aspects of section 11e on internal monitoring is compiled into an annual monitoring report by SES. This annual report is submitted by 30 April each year covering the previous calendar year to the European Commission. The received market data will be submitted to the Commission in the format specified on the Commission Voluntary Scheme website [...] • 11. Approval procedure for 3rd Party Certification bodies • e. Review/Internal monitoring • SES takes responsibility to review and monitor the process and documents of SSAP/RED certificate holders and CBs executing the audits and issuing the certificates. The monitoring program consists of the following items: [...] • Complaint registrations and information received from external parties (market data) concerning the integrity of the program is collected by SES. • The information distilled from all above points shall be part of the annual monitoring report by SES. This annual report is submitted by 30 April each year covering the previous calendar year to the European Commission, as described in chapter 7.
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