

RSB – ROUNDTABLE ON SUSTAINABLE BIOMATERIALS

**Procedure for Development and Modification of RSB Standards, RSB
Procedures and RSB Guidance**

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Objective and summary

The objective of **RSB-PRO-15-001** is to describe how RSB Standards, RSB Procedures and RSB Guidance are developed and modified. The process outlined in this document is intended to be open and transparent in compliance with the ISEAL (International Social and Environmental Accreditation and Labeling) Code of Good Practice for Setting Social and Environmental Standards.

The ultimate authority for approving development and modification of RSB's Standards is the RSB's multi-stakeholder Assembly of Delegates (RSB Assembly). RSB procedures are approved by the Board of Directors (RSB Board) and RSB guidance documents are approved by the RSB Executive Director. The Secretariat is empowered to handle minor modifications and is the entity that oversees the development and modification process, including consultation, field testing, and preparation of draft documents, in consultation with relevant technical standards working groups.

Comments on and review of this document

Any party can make comments on the procedures described in this document by writing to the RSB Secretariat (info@rsb.org). The Secretariat will undertake a regular review of this document every five years, or earlier if deemed necessary by the Secretariat or RSB Board. The review shall take into account any comments received, the actual working practices of the Secretariat, and any changes to the ISEAL Code of Good Practice.

TABLE OF CONTENTS

OBJECTIVE AND SUMMARY	2
A. SCOPE.....	4
B. TERMS AND DEFINITIONS	4
C. ABBREVIATIONS	6
D. CLASSIFICATION OF RSB DOCUMENTS	6
E. STANDARDS WORK PLAN	6
F. STANDARDS WORKING GROUPS	6
G. PROPOSING A MODIFICATION OR DEVELOPMENT OF A STANDARD, PROCEDURE OR GUIDANCE.....	7
H. SECRETARIAT EVALUATION OF PROPOSALS.....	8
I. MINOR STANDARD MODIFICATIONS PROCESS.....	9
J. RSB STANDARD AMENDMENT	9
K. INTERIM MODIFICATIONS OF STANDARDS	10
L. RSB CORE STANDARDS REVISION AND NEW STANDARDS DEVELOPMENT	10
M. DEVELOPMENT AND REVISION OF REGULATORY STANDARDS	13
N. RSB PROCEDURES: DEVELOPMENT AND MODIFICATIONS	14
O. RSB GUIDANCE: DEVELOPMENT AND MODIFICATIONS	15
P. OTHER SECRETARIAT DUTIES REGARDING DEVELOPMENT AND MAINTENANCE OF RSB STANDARD, PROCEDURES AND GUIDANCE.....	16
ANNEX: HISTORY OF CHANGES	17

A. Scope

The procedures outlined in this document are valid for all existing and future RSB Standards, Procedures and Guidance.

B. Terms and Definitions

The terms and definitions as specified in RSB Glossary of Terms (RSB-STD-01-002) apply. The following terms and definitions apply in addition:

Certification scheme refers to a certification system related to specified products, to which the same specified requirements, specific rules and procedures apply (Source: ISO/IEC 17065:2012).

Please note:

RSB operates the following certification schemes:

- RSB Global
- RSB EU RED
- RSB ICAO CORSIA

Part of RSB Standards are used in each certification scheme. Each scheme determines which of the standards are applicable.

Certification system refers to the rules, procedures and management for carrying out certification (Source: ISO/IEC 17000:2004, modified).

The RSB Certification System includes the three certification schemes as well as procedures for auditing and accreditation that are common to all schemes.

An **RSB Standard** is a normative document that specifies environmental, social or economic performance required from participating operators to receive certification. They include definitions of technical terms as well as methodologies to calculate scientific values. Example of RSB Standards include: RSB Principles & Criteria, RSB Standard for Advanced Fuels, RSB Methodology for Displacement Emissions

RSB Standards can be split into two different categories:

- RSB Core Standards
 - RSB Principles & Criteria [RSB-STD-01-001]
 - RSB Standard for Advanced Fuels [RSB-STD-01-010]
 - RSB Standard for Advanced Products [RSB-STD-02-001]
 - RSB GHG Calculation Methodology [RSB-STD-01-003-01]
 - RSB Methodology for Displacement Emissions [RSB-STD-04-002]
- RSB Regulatory Standards
 - RSB Standard for EU Market Access [RSB-STD-11-001]
 - RSB Standard for ICAO CORSIA [RSB-STD-12-001]

An **RSB Procedure** is a normative document that specifies the proper implementation of RSB Standards and the RSB certification system. RSB Procedures are intended to standardise operating procedures, help stakeholders understand the operations and implementation of the system, and increase transparency and accountability. Examples of RSB Procedures include: RSB Procedure on Communication and Claims, RSB Procedure for Certification Bodies and Auditors.

RSB Procedures do not, however, concern the environmental, social or economic performance required from participating operators to receive certification.

An **RSB Guidance** is a normative document that interprets requirements in RSB Standards or RSB Procedures in a specific context. RSB Guidance can be reactively issued following a request from a participating operator or another RSB stakeholder or proactive. Examples of RSB Guidance include: RSB Guidance on Scope Changes.

An **RSB Guideline** is a non-normative document designed to help auditors and operators understand RSB environmental and social impact assessments and the management process. Example of RSB Guidelines include: RSB Soil Impact Assessment Guidelines.

The complete list of RSB Standards, Procedures, Guidance and Guidelines can be found at <https://rsb.org/the-rsb-standard/working-with-the-rsb-standard/>

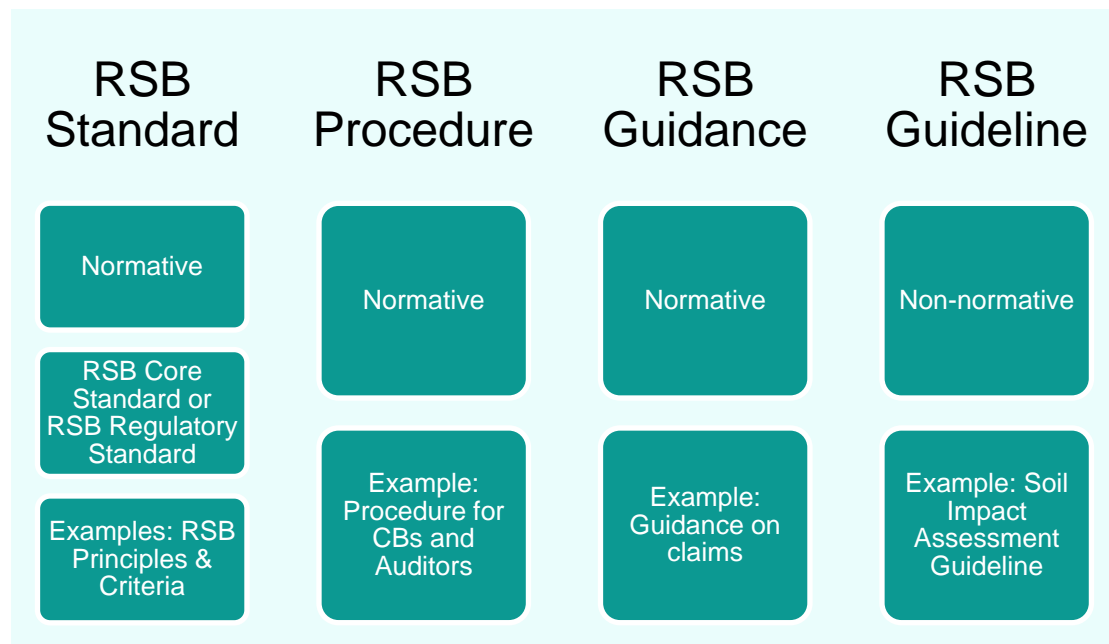


Figure 1: Overview of RSB documents

C. Abbreviations

RSB: Roundtable on Sustainable Biomaterials

RSB Board: RSB Board of Directors

RSB Assembly: RSB Assembly of Delegates

CB: Certification Body

SWG: Standard Working Group

D. Classification of RSB Documents

RSB documents shall be classified into the categories *RSB Standards*, *RSB Procedures*, *RSB Guidance* and *RSB Guidelines* according to the specifications given in section B “Terms and Definitions”. In cases of uncertainty, the RSB Secretariat shall seek input from the RSB Board.

Whenever the RSB Secretariat intends to re-classify an existing document, the RSB Board shall be informed at least 14 days in advance of the implementation of the re-classification. The RSB Board may object to the re-classification.

E. Standards Work Plan

The RSB Secretariat shall develop, and keep updated, a work plan describing planned standard amendments, as well as major modifications and new developments for standards and procedures. The work plan shall be submitted to the RSB Board for review at the beginning of the calendar year and, in the case of major changes, during the course of the year. The work plan shall be published on the RSB website and kept updated.

Please note: Approval by the RSB Board is not required.

F. Standards Working Groups

In order to support the Secretariat with standard development activities such as modifications, development of new standards or guidance on standards, the RSB Board may set up Standards Working Groups (SWGs).

Experts of the SWGs will be nominated by RSB members. Each RSB member can nominate up to two experts. Non-members may also nominate experts and may be accepted if additional expertise is required. Non-member experts have no voting rights but can participate in the meetings as observers.

The SWG will decide on proposals for standard revisions to be submitted to RSB members for adoption by the RSB Assembly. Decisions on standard revision proposals will be taken by consensus within the SWG. If consensus cannot be achieved, the opposing positions will be presented in the report to the RSB Assembly. The final decision on standard revisions will be for the RSB Assembly to make. The SWG shall strive to achieve a balanced representation of opinions and expertise from the RSB membership.

1. General Standards Working Group

With the adoption of this procedure, the RSB Board establishes a General Standards Working Group (GSWG) to support the RSB Secretariat in the ongoing standards work. The GSWG is a group of continued existence, formed to do assigned work on an ongoing basis

A Board member shall serve as the Chair of the GSWG. The activities of the GSWG shall include:

- a) Review and input on the annual standards workplan.
- b) Review and input on Terms of Reference for RSB core standard revisions and new standard developments.
- c) Review, input and agree on drafts for standards, standard modifications and standard guidance documents.

2. Specific Standards Working Group

The RSB Board may also establish additional SWGs for a specific topic (for example in 2018 the Working Group on Displacement Effects). The scope, structure, timeline and finance shall be defined in a specific terms of reference document, to be approved by the RSB Board.

G. Proposing a Modification or Development of a Standard, Procedure or Guidance

A proposal to introduce new standards, procedures or guidance and/or adapt or modify content of the existing standards can be made by:

- RSB-certified operators
- CBs or auditors working with the RSB Standard
- Accreditation Bodies
- RSB Secretariat

- Members of the RSB, through RSB Chambers, the RSB Board, or the RSB Assembly
- The RSB Secretariat based on its own initiative or feedback received from the general public

A proposal can be made at any time. All proposals shall be made in written form to the RSB Secretariat, and shall clearly:

- a. identify the specific portion of the standard to be modified or the type of standard to be introduced;
- b. outline the rationale for the proposal and the stakeholder groups that could potentially be affected by the proposal; and
- c. where relevant reference background papers and, previous decisions or discussions by the RSB.

The RSB Secretariat shall have an easily accessible section on the RSB website that allows stakeholders to make comments on existing RSB Standards, Procedures, Guidance and Guidelines at any time.

The RSB Secretariat shall maintain a registry (*standard revisions registry*) to log any comments that are received. For every revision of an RSB Standard, Procedure, Guidance or Guideline, the standard revision registry shall be consulted. Whenever a comment falls under the scope of a standard revision, modification or development, the comment shall be evaluated, and it shall be assessed if it can be taken into account for the standard. The rationale for why it was considered or not shall be logged in the registry. The party who made the comment shall be informed about the outcome.

Even if no proposals for making modifications have been put forward, RSB Standards are automatically reviewed every five years to comply with ISEAL's Code of Good Practice for Setting Social and Environmental Standards. These automatic reviews shall follow the consultation and approval procedures described below for major modifications. The official review cycle should be included in the standards at the time of their publication.

H. Secretariat evaluation of proposals

The Secretariat shall review and evaluate all proposals. The Secretariat shall identify if these require a:

- Minor modification to a standard, a procedure or a guidance;
- Standard amendment;
- Interim modification to a standard, a procedure or a guidance;
- Standard or procedure revision; or
- New standard or new procedure development.

The steps as outlined below shall be followed.

I. Minor Standard Modifications Process

Minor modifications are modifications to the standards that do not fundamentally change the content of a criterion or principle, such as improving or clarifying the language or providing guidance notes. Minor modifications also include clarifications or specifications in line with international regulations or global best-practice that do not fundamentally change the content of a criterion or principle.

The Secretariat may make minor modifications to standards at its discretion. The Executive Director of the Secretariat shall approve the modifications and notify the Chair of the RSB Board of the modifications.

The RSB Secretariat shall distribute the revised standard with a summary of modifications to RSB Members, the European Commission (if relevant for RSB EU RED), ICAO CORSIA (if relevant for ICAO CORSIA), participating operators, CBs, accreditation bodies, recognised consultants and training coordinators.

The RSB Secretariat shall publish the modified standard on the RSB website.

J. RSB Standard Amendment

An *RSB Standard Amendment* is a normative document that may be developed with the aim of modifying or amending one or several existing RSB Standards. An *RSB Standard Amendment* shall contain specific modifications and amendments, such as:

- Additional or modified terms and definitions
- Additional or modified requirements to existing RSB Standards
- Additional sections to existing RSB Standards

An *RSB Standard Amendment* shall clearly describe which sections of an existing RSB Standard are to be modified and a rationale for why the modification or amendment is suggested.

The following process shall be followed when developing an *RSB Standard Amendment*:

1. Development of a Terms of Reference (TOR) document, including the specification of scope, objective, timeline and RSB Standards affected
2. Identification of stakeholder types and individuals to be engaged and setting of thresholds for engagement levels
3. Information of the RSB Board by submitting the TOR
4. Drafting of the *RSB Standard Amendment* and consultation of identified stakeholders
5. Consultation of RSB Membership
6. Approval by the RSB Assembly via email or in-person

Following approval, the affected RSB Standard shall be revised based on the modifications or amendments as specified in the *RSB Standard Amendment*. The affected RSB Standards shall be valid without further approval required from the RSB Assembly of Delegates.

K. Interim Modifications of Standards

Interim modifications of RSB Standards are quickly required to facilitate the immediate implementation of the RSB Standard and certification system. Such modifications may be approved by the RSB Board upon recommendation by the Secretariat and shall be considered as interim measures of limited duration. RSB Members may object to interim modifications within two weeks (fourteen days) from the publication date. In absence of objection, interim modifications will be considered approved.

If relevant, interim modifications should go through the full consultation process for permanent inclusion in corresponding standards and procedures no longer than 24 months after approval by the RSB Board. Interim modifications of standards are described in the RSB Standard on Requirements for Adaptation during the Start-up Phase [RSB-STD-80-001].

L. RSB Core Standards Revision and New Standards Development

The following steps shall be followed for RSB Core Standards revisions and new standards development.

Please Note: The following does not apply for RSB Regulatory Standards. See section M for further information

1. Development of draft Terms of Reference

The Secretariat shall develop a Terms of Reference, which describe:

- the scope, objectives, justification, risks of implementing standards modifications/developments;
- an assessment of risks and unintended consequences in implementing the standard and how to mitigate these;
- the timeline; and
- the consultation and decision-making process, field-testing requirements and advisory services (e.g. consultants and/or a technical committee) needed for the consultation.

In this step, the RSB Secretariat shall also identify key stakeholders who are representative of RSB stakeholder groups, determine the opportunities for stakeholders to engage in the consultation, and participation goals. The Terms of Reference can cover more than one standards modification or development at a time.

When developing the Terms of Reference for new standards, the RSB Secretariat shall assess whether there are international standards available covering a similar scope. In this case the standard owner organisation shall be included in the stakeholder list to be engaged for the development of the standard, if appropriate.

The Terms of Reference shall be reviewed by the GSWG and the RSB Board.

2. Communication of standards development process

The revision of a core standard or the development of a new standard shall be officially announced to all RSB Members and published on the RSB website. The RSB Secretariat shall inform participating operators, CBs, accreditation bodies and training coordinators.

The announcement shall include a public summary of the process including:

- Summary of the Terms of Reference, including a brief, clear description of the scope and objectives and justification of the need for the proposed standard;
- Steps in the standard-setting process, including timelines and clearly identified opportunities to contribute;
- Decision-making procedures; and The point of contact at RSB for further information.

3. Preparation of consultation documents

The RSB Secretariat and the GSWG shall prepare relevant documents, including the proposed standard, for consultation. Technical advisors (consultants or technical committees) and users of the RSB standards (e.g. Participating Operators, CBs, etc.) may provide input into the development of these draft documents.

4. Public Consultation

A public consultation shall be organised for any development or major revision of core RSB Standards.

Public consultation is not required for RSB Regulatory Standards, RSB Procedures, RSB Guidance or RSB Guidelines. The consultation documents shall be posted to the RSB website, and circulated to stakeholders and interested parties, for a public comment period of at least 60 days. During this time, the general public shall be free to comment on the proposed standard. The Secretariat shall also proactively seek out key stakeholders in order to reach the identified participation goals, ensure that disadvantaged groups are able to participate, and consider different ways that stakeholders can participate in the consultation, based on ISEAL's Code of Good Practice.

After the public comment period has ended the Secretariat shall post a synthesis of comments received to the RSB website without attributing their origin. During this process, the Secretariat, in consultation with the GSWG, may decide to disregard certain comments, for example, when these are not relevant to the scope of consultation, or if similar suggestions were already discussed and decided upon in the past. The synthesis of comments received shall include a justification describing why certain comments were disregarded.

If there are major objections to the revised proposal, the Secretariat, in consultation with the GSWG, shall endeavour to suggest an improved draft and post it on the website for a second period of public comment of 60 days. The second public comment period may be shortened but shall be at least 30 days. Justification for the shortened comment period shall be publicly explained (for example, on the RSB website).

If there are no major objections to the content, the Secretariat, in consultation with the GSWG, can decide not to hold a second round of consultation. Any other justifications to cancel a second round of consultation shall be presented to the RSB Board.

After the second public comment period, the RSB Secretariat shall post a synthesis of comments received to the RSB website. Based on the comments the Secretariat, in consultation with the GSWG, shall revise the proposed standard in preparation of RSB Members consultation and final approval. During this process the Secretariat, in consultation with the GSWG, may decide to disregard certain comments, for example, when these are not relevant to the scope of consultation, or if similar suggestions were already discussed and decided upon in the past. The synthesis of comments received shall include a justification describing why certain comments were disregarded.

5. *RSB Chamber Consultation*

After the second round of public consultation, the RSB Secretariat shall integrate the comments received during the public consultation into the draft documents and open a consultation period for all RSB Chambers to make comments on the proposed standard. Such consultation period may include in-person meetings, teleconferences and email exchanges.

Chambers shall seek consensus on the proposed standard with or without modifications. If consensus cannot be achieved, additional rounds of Chamber consultation may be organised by the Secretariat, followed by a voting procedure whenever required (See *RSB Articles of Association*). Alternatively, a Chamber may decide to propose several options to the decision of the RSB Assembly .

After the Chamber consultation, the Secretariat and the GSWG shall revise the proposed standard to reflect the comments received during Chamber consultation.

6. *Optional field testing*

Based on the recommendation of the RSB Board or GSWG, a field test of the revised or new standard may occur either during or after the consultation process to

understand its applicability in one or more real-world operations. The RSB Secretariat should execute and oversee the field test, pending sufficient resources.

A summary report shall be produced from the test that includes:

- a. a description of the project in which the pilot was conducted;
- b. a statement as to whether the proposed standard is practical and applicable in a real-world setting; and
- c. recommendations for further modifications to the draft standards to incorporate the findings of the field test.

7. Approval process

The final recommendation of the proposed standard shall be presented to the RSB Assembly along with accompanying materials as described above. The RSB Assembly may then:

- a. approve the proposed standard as written;
- b. approve the proposed standard with amendments;
- c. reject the proposed standard; or
- d. request the RSB Secretariat / SWG to continue to work on the standard through another round of member consultation;

If the RSB Assembly approves the proposed standard, the Secretariat shall publish the final standard including its effective date and implications for currently certified operators, and inform the GSWG, RSB members, and other stakeholders.

If the RSB Assembly requests a further review process or significant modifications, it shall state the reasons and may suggest what steps it considers necessary in order to address its concerns. The Secretariat/GSWG may submit a proposal to the RSB Board on how to address the issues raised by the RSB Assembly.

8. New standards development

A proposal to create an additional standard is treated as a major modification and follows the approval and development process as described below.

M. Development and Revision of Regulatory Standards

1. Procedure development process

Regulatory standards may be developed by the RSB Secretariat to meet specific requirements or comply with regional definitions in certain jurisdictions or international regimes (e.g. for the EU or ICAO CORSIA).

A regulatory standard shall only be applied in combination with the set of RSB core standards. It is not permitted to apply RSB regulatory standards as stand-alone documents. The applicability of RSB documents per operator type is specified in RSB Procedure for Certification Bodies and Auditors [RSB-PRO-70-01].

2. Approval and notifications

RSB regulatory standards are typically approved by the relevant regulator (e.g. EU Commission, ICAO CAEP). Therefore, approval by the RSB Assembly or the RSB Board is not required.

The RSB Secretariat shall inform the RSB Board about the development of an RSB Regulatory Standard. Before submission of an RSB Regulatory Standard to the relevant regulator, the RSB Secretariat shall inform the RSB Board and the RSB membership about areas that deviate from the RSB core standard. Based on the comments from the RSB membership, the RSB Board may object to the proposed submission to the regulator.

N. RSB Procedures: Development and Modifications

1. Procedure development process

RSB procedures may be drafted by the Secretariat or technical advisors/consultants.

As part of the drafting process, the RSB Secretariat shall consult parties that are or will be affected by the requirements (for example auditors and participating operators) as well as technical experts, as necessary.

2. Approval and notifications

The RSB Board shall approve all procedures. The RSB Secretariat shall highlight to the RSB Board contentious requirements, i.e. requirements on which comments have been raised by affected parties. Where there is an urgent need to approve a procedure, the Chair of the RSB Board may make the approval.

Approved procedures shall be published on the RSB website. Key stakeholders (e.g. RSB Members, certified operators, certification bodies, the RSB accreditation body, etc.) will also be notified of new procedures if the procedure is directly related to their affiliation with RSB.

3. Minor and Major revisions

Minor modifications are modifications to the procedures such as improving or clarifying the language or providing guidance notes that do not fundamentally change the content of a requirement. Minor modifications include improving or clarifying the language, correcting typing or grammatical errors, or providing explanatory notes that do not fundamentally change the content of a procedure.

Major modifications are modifications of the procedures that change the definition of a term or the content, interpretation or implementation of a requirement.

The Secretariat may make minor revisions to procedures at its sole discretion. Major modifications require the approval of the RSB Board.

4. *Revision schedule*

Procedures will be automatically reviewed every three years, taking into account any stakeholder recommendations and comments. The scheduled revision process will be incorporated into the work plan presented to the RSB Board.

O.RSB guidance: Development and modifications

1. *Reactive Guidance*

Reactive Guidance is generated punctually in response to a request by an operator, auditor, or certification bodies to get rapid feedback on the context, meaning, or intent of a particular element of a standard or a procedure.

Requests should be addressed to the RSB Secretariat who shall determine if it is a clarification, or an interpretation issue.

Clarification consists of providing references, facts or specific quotes from existing RSB documents.

Interpretation consists of explaining the meaning or the intent of a particular requirement, for which the language used in the corresponding standard or procedure is not sufficiently clear.

For clarification requests, the RSB Secretariat shall answer the question within three business days, using the existing standards documents as the basis for their answer.

For interpretation requests, the RSB Secretariat shall answer the question within five working days. The Secretariat may escalate the request to the RSB Board, which shall be asked to give an answer within five days. If timing is urgent, the Chair of the RSB Board can decide on the answer.

2. *Proactive Guidance*

Proactive Guidance is provided in full explanatory documents which are developed on a longer timescale. The Secretariat should decide on what guidance documents need to be updated, or developed based upon inquiries that come from operators, auditors and certification bodies, as well as areas where the Secretariat feels that further direction is needed.

Proactive guidance documents shall be drafted by the RSB Secretariat and approved by the Executive Director. Input and guidance from the RSB Board shall be sought if needed. The RSB Secretariat can consult the GSWG for feedback throughout the drafting process.

3. *Record-keeping*

RSB Secretariat shall maintain a log of all requests for guidance and how they have been answered.

The GSWG shall receive an annual summary of the inquiries received by the RSB Secretariat.

Any research conducted by the Secretariat in determining guidance shall be archived in order to inform future guidance and standard-setting decisions.

P. Other Secretariat Duties Regarding Development and Maintenance of RSB Standards, Procedures and Guidance

The Secretariat shall maintain all relevant written records related to the process including proposals, draft and final documents, consultation documents, parties consulted, field test results, GSWG minutes, and RSB Board of Director decisions for five years. Any public document shall remain available upon request for five years.

The Secretariat shall keep the RSB Board and RSB Assembly informed of all standards and procedure developments and modifications through regular updates.

Annex: History of changes

Main changes from the previous version (RSB-PRO-15-001 version 3.1)

- a. Specifications on the development and maintenance of RSB Procedures [RSB-PRO-25-001] and RSB Guidance [RSB-PRO-35-001] were integrated into this document [RSB-PRO-15-001]
- b. Definitions were added and terminology was clarified
- c. Specific processes for RSB Core Standards and RSB Regulatory Standards were added
- d. Specifics and processes for standard working groups were clarified
- e. The process for developing RSB Standard amendments was added
- f. The processes for modifications, amendments and new developments were simplified

Main changes from the previous version (RSB-PRO-15-001 version 3.0)

- g. References to the RSB Services Foundation were either removed or replaced by “RSB Secretariat”, since the activities of the RSB Services Foundation were transferred to the RSB Secretariat as of February 1, 2014