

Certification Evaluation Report

Roundtable on Sustainable Biomaterials

RSB Global

Plastic Energy Sevilla S.L.

SCS Certificate Code: SCS-RSB/PC-0042

Polígono Industrial Espaldillas, Paseo Espaldillas Diecinueve, nº 5,
Alcalá de Guadaíra, Sevilla 41500, Spain
Joaquin Pineda
www.plasticenergy.com

CERTIFIED	EXPIRATION
20 November 2020	19 November 2023

DATE(S) OF AUDIT
10-11 June 2020
DATE OF LAST UPDATE
2 December 2020

SCS Contact:

Matthew Rudolf | Manager, Biofuels
+1.919.533.4886 (direct) mrudolf@scsglobalservices.com



2000 Powell Street, Ste. 600, Emeryville, CA 94608 USA
+1.510.452.8000 main | +1.510.452.8001 fax
www.SCSglobalServices.com

FOREWORD

SCS Global Services (SCS) is a certification body accredited by the Roundtable on Sustainable Biomaterials (RSB) to conduct evaluations of biofuel operators (CB Registration No. 592). Under the RSB/SCS certification system, participating operators meeting international standards of biofuel production can be certified as “sustainable,” thereby permitting the Operator’s use of the RSB endorsement and logo in the marketplace subject to regular RSB/SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts all over the world to conduct evaluations of biofuel operations. SCS evaluation teams collect and analyze written materials, conduct interviews with Participating Operator’s staff and key stakeholders, and complete field and office audits of the operation(s) identified in the certification scope. Upon completion of the fact-finding phase of all evaluations, SCS teams determine compliance to the RSB Principles and Criteria.

Please Note: An RSB certificate itself does not constitute evidence that a particular product supplied by the certificate holder is certified to RSB standards. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required RSB claim is clearly stated on-product. For more information about the RSB, visit their website at www.rsb.org.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Roundtable on Sustainable Biomaterials. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs, and policies applied to the Participating Operator, and the results of the evaluation. Section A will be posted on the RSB Participating Operators Database (<http://rsb.org/certification/participating-operators/>). Section B contains more detailed results and information for use by the Participating Operator.

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SECTION A – PUBLIC SUMMARY

1.0 GENERAL INFORMATION

1.1 Operator Information

1.1.1 Name and Contact Information

Organization name	Plastic Energy Sevilla S.L.		
Operator Number	2125		
Contact person	Joaquin Pineda		
Address	Polígono Industrial Espaldillas, Paseo Espaldillas Diecinueve, nº 5, Alcalá de Guadaíra, Sevilla 41500, Spain	Telephone	+34 674 297 277
		Fax	
		e-mail	joaquin.pineda@plasticenergy.com
		Website	www.plasticenergy.com

1.2 Scope of Certificate

Please select one:	<input type="checkbox"/> RSB EU RED	<input checked="" type="checkbox"/> RSB Global
Please select boxes that apply:	<input type="checkbox"/> Pre-assessment <input checked="" type="checkbox"/> Initial Assessment <input type="checkbox"/> Re-certification <input type="checkbox"/> Follow-Up to NCs	<input type="checkbox"/> 1st Annual Surveillance <input type="checkbox"/> 2nd Annual Surveillance <input type="checkbox"/> 3rd Annual Surveillance <input type="checkbox"/> 4th Annual Surveillance
Scope as it appears on certificate:	Industrial facility and First Collector 4 Points of Origin - (see 1.1.2 above) Input: End-of-life plastic Output: TACOIL	
The scope assessment agrees with the scope under which the operator applied	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If no, please explain:		
<p><i>Note 1: If the scope is different, please contact SCS.</i></p> <p><i>Note 2: Where the client uses external organizations (public or private) to provide utilities services, such as electricity, waste disposal, water, the auditor shall check that these organizations are run according to local requirements (i.e. the law) but these organizations will not be considered in scope of the audit. Therefore no on-site visits to these utility services are required.</i></p>		
Total workers covered by scope of certification:	19	
Number of women workers	2	

1.2.1 Determination of Extent of Audit

Total number of subsidiaries, branch offices, affiliated entities, external third parties contracted or otherwise engaged, operational structures, sites, facilities, processing and production units, and supply chain structures	1 first collector - industrial operator with a single site under the scope (chemical recycler) 3 external Points of Origin (1 providing to first collector, 2 providing directly to Plastic Energy) 1 of these Points of Origin also renders pre-treatment services for the raw material as a contractor.
Participating Operator Risk Class	Medium (risk class updated after audit from low since new risks were identified)
Disputes or prior Non-compliances	None
Changes in scope since last evaluation	First Audit
Total number of compliance claims	None

1.2.2 Standards Used

Applicable RSB-Accredited Standards

Standard Name and Version
• RSB Principles & Criteria (RSB-STD-01-001 V3.0);
• RSB Chain of Custody (RSB-STD-20-001 V3.1);
• RSB Standard for Participating Operators (RSB-STD-30-001 V3.1);
• RSB Risk Management (RSB-STD-60-001 V3.1);
• RSB GHG Calculation Methodology (RSB-STD-01-003-01 V2.3);
• RSB Procedure on Communication and Claims (RSB-PRO-50-001 V3.3);
• RSB Standard for Advanced Products (RSB-STD-02-001 V 2.0)

All standards employed are available on the websites of the Roundtable on Sustainable Biomaterials (<https://rsb.org/the-rsb-standard/working-with-the-rsb-standard/>). Standards are also available, upon request, from SCS Global Services.

1.3 Sites in Scope

1.3.1 Industrial Facility and First Collector

Name of Facility	Plastic Energy Sevilla S.L.
Type	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input type="checkbox"/> Vegetable oil Extraction <input type="checkbox"/> Biofuel Production and/or Distribution <input checked="" type="checkbox"/> Other, please explain here: Chemical recycler of raw material for Advanced Products

Location/City	Alcalá de Guadaira - Seville
Geographic location (<i>Latitude & Longitude</i>)	37.368225, -5.894845
Start date of operations (initial start date)	November 2017
Number of processing steps	Feedstock pre-treatment, thermal anaerobic conversion (pyrolysis), distillation column.
Description of the product or the product component that the certification covers, including, if applicable, the specification of the mass of the certified component related to the total product.	Pyrolysis oils (LIGHT OIL (RAW NAPHTHA), RAW DIESEL, and TACOIL) for production of advanced products. RSB products only considered: TACOIL
Annual throughput of previous 12 months <i>(Can be moved to appendix if certain information is confidential)</i>	
Feedstock Input (Metric Ton)	Not yet certified, first audit.
Final/Primary Product Output (Metric Ton)	Not yet certified, first audit.
Intermediate/by-product Output (Metric Ton)	Not yet certified, first audit.
% output yield compared to input material (total output/total input)	Not yet certified, first audit.
Amount sold as RSB certified (tons)	Not yet certified, first audit.

1.3.2 Subcontractors

1. Name	Reciclados La Red SL (also a point of origin)
Location/City	Poligono Industrial La Red C/La Red, 14-19 41500 Alcala de Guadaira - Sevilla
Geographic location (<i>Latitude & Longitude</i>)	37.374896,-5.8805857,17
Material stored:	Untreated and pre-treated end-of-life plastic waste

1.3.3 Points of Origin

Number of Points of Origin in Scope	4
Number of Points of Origin providing more than ten metric tons per months	4
Number of Points of Origin Assessed on a Sample Basis during This Audit	2
List of Points of Origin Assessed on a Sample Basis during This Audit	
1. Name	Zorroza Gestión
Location/City	Amurrio/Alava
Geographic location (<i>Latitude & Longitude</i>)	43.067612,-3.0310145
Material stored:	End-of-life plastic
2. Name	Plastic Energy Andalucía Uno

Location/City	El Ejido/Vitoria
Geographic location (<i>Latitude & Longitude</i>)	37.0567408,-5.4303947,8
Material stored:	End-of-life plastic
<i>Add more lines as you see fit</i>	

All points of Origin in Scope

1. Organization name	Zorroza		
Contact person	Imanol Zorroza		
Address	POLIGONO INDUSTRIAL SARATXO, 01470, Amurrio (Álava)	Telephone	+34 609 905 195
		Fax	
		e-mail	logistica@zorroza.net
		Website	www.zorroza.net
Nature of Involvement:			
Point of Origin (EOL plastic)			
2. Organization name	Plastic Energy Andalucía Uno SL		
Contact person	Miguel Ángel Juárez		
Address	C/ La Molina, 90 Las Norias de Daza, El Ejido (Almeria)	Telephone	(+34) 950 568 013
		Fax	
		e-mail	Miguel.Juarez@plasticenergy.com
		Website	www.plasticenergy.com
Nature of Involvement:			
Point of Origin (EOL plastic)			
3. Organization name	Recicladados La Red		
Contact person			
Address	Poligono Industrial La Red C/La Red, 14-19 41500 Alcala de Guadaira - Sevilla	Telephone	
		Fax	
		e-mail	
		Website	www.recicladoslared.es
Nature of Involvement:			
Point of Origin (EOL plastic) (also sub-contractor for pre-treatment)			

4. Organization name	Der Grüner Punkt		
Contact person			
Address	Frankfurter Strasse 720-726. 51145 Köln (Porz Eil)	Telephone	
		Fax	
		e-mail	
		Website	www.gruener-punkt.de
Nature of Involvement:			
Point of Origin (EOL plastic)			

1.4 GHG Intensity

Advanced products from non-biogenic end-of-life products or production residues			
Advanced Product:	TACOIL	GHG:	483.89 kg Co2 eq/ dry ton
Avoided emissions in g CO2eq/ dry-ton for raw materials and (intermediary) products		1,350.56 g CO2eq/ ton TACOIL	
For end-of-life products or processing residues: if avoided emissions were accounted for, specify the baseline scenario (see RSB-STD-02-001 and RSB-STD-01-010)		Avoided Emissions were calculated for waste incineration as a baseline scenario. Waste plastic was consumed as feedstock instead of being incinerated. Study: Deloitte: Increased EU Plastics Recycling Targets: Environmental, Economic and Social Impact Assessment, May 1, 2015.	

1.5 Advanced Product Information *(Can be moved to appendix if certain information is confidential)*

If the feedstock for a batch of RSB certified Advanced Product is not wholly but only partly RSB-certified: state the amount of certified feedstock in relation to the total mass of the feedstock for the appropriate category:	
For Category II products:	
State the recycled carbon content in relation to the total carbon content	Recycled carbon content: 100%
State the method used to determine the recycled carbon content	Auditor confirmed that product is made only from waste plastic with no mix with raw material of other (virgin) origin.

2.0 EVALUATION PLANNING & PROCESS

2.1 Audit Team

Auditor Name:	Maite Lasa	Auditor role:	Lead Auditor
Qualifications: Maite is a certified Auditor against sustainability schemes including RSB, ISCC an Bonsucro. Previously she has worked as a sustainability consultant in renewable energy and in climate change mitigation, and in the biofuels sector particularly in the production of energy crops for biodiesel production. She has received a Master in Public Administration focused in energy and environment at the University of Columbia (New York, USA).			
Auditor Name:	Justin S. Richter, Ph.D.	Auditor role:	GHG Verifier
Qualifications: Dr. Richter is a Life Cycle Analysis practitioner and Supply Chain researcher in the areas of biofuels, renewable energy, advanced products and social impacts. He holds GHG certification from ISCC. Dr. Richter has received a Ph.D. in Environmental and Ecological Engineering from Purdue University (West Lafayette, IN, USA)			

2.2 Evaluation Schedule and Extent of Audit

2.2.1 RSB Audit types Matrix

	Low risk class	Medium risk class	High risk class
Certificate validity	5 years	3 years	2 year
Main audit	Every 5 years	Every 3 years	Every 2 year
Surveillance audit	Annual	Annual	Annual

2.2.2 Methodology and Strategies Employed

SCS deploys interdisciplinary teams with expertise in agriculture, ecology, forestry, social sciences, natural resource economics, and other relevant fields to assess an Operator’s compliance to RSB standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of site and facility types, observation of implementation of management plans and policies, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant site observations, stakeholder comments, and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section.

Remote audit technology was used (video conferencing).

Due to the Coronavirus sanitary emergency, this audit was run remotely (on-line) under an exception made by RSB for such cases.

2.2.3 Evaluation Itinerary and Activities

Time	Element/Activity	Personnel
June 10, 2020	Remote facility audit	
9:00 a.m.	Opening Meeting and General Requirements <ul style="list-style-type: none"> - Introduction to certification program and assessment process to on-site staff - Review of scheduled activities - Review of RSB Procedures; confirm roles, responsibilities and processes - Confirmation of scope of products to be certified - Clarification of all suppliers; i.e. farms, blending, transportation, storage - Client to outline production process and overall process flow - Review site map(s) 	Management
10:00	Document Review: Participating Operator/ Standards Checklist <ul style="list-style-type: none"> - Review of training procedures and records - Review of Grievance Mechanism - Review of traceability method and implementation (including acquiring, handling, and forwarding sustainable material - Analysis of material balances and records - Review of records - Review of GHG inputs - Communications and Claims - Requirement for Advanced Fuels/ Advanced Products 	Management
12:00	Remote Site Walk-through <ul style="list-style-type: none"> - Observe operations at processing facility - Observe feedstock and product storage area - Observe chemical storage and disposal - Observe sludge repository or disposal - Observe other critical control points 	Management
2:00	Lunch Break <ul style="list-style-type: none"> - Working lunch off site 	
3:00	Document Review: Compliance with Principles and Criteria Principle 1:	Management

	<ul style="list-style-type: none"> - Review of all relevant business licenses - Review of land and water use permits <p>Principle 2:</p> <ul style="list-style-type: none"> - Review screening tool - Review environmental and social management plan - Review impact assessments, if applicable - Review stakeholder engagement records <p>Principle 4:</p> <ul style="list-style-type: none"> - Work conditions, living wage, equality issues, unions - Review of contracts, policies and training records grievances - Training and occupational health and safety record - Records for freedom of association mechanism <p>Principle 7:</p> <ul style="list-style-type: none"> - Conservation values, ecosystems, buffers, water rights <p>Principle 9:</p> <ul style="list-style-type: none"> - Water permits, water management in ESMP <p>Principle 10:</p> <ul style="list-style-type: none"> - Air permits, air management in ESMP <p>Principle 11:</p> <ul style="list-style-type: none"> - Integrated waste management - Resource and energy usage, and efficiency <p>Principle 12:</p> <ul style="list-style-type: none"> - Review documentation of historic land use/land tenure, legal tenure 	
5:00	<p>Stakeholder Interviews</p> <ul style="list-style-type: none"> - Independent cross check of potential social (e.g. status and impacts, land tenure) and environmental issues (e.g. understanding of no-go areas, high biodiversity or special conservation areas addressed or not) 	Local stakeholders
6:00	<p>Report Writing</p> <ul style="list-style-type: none"> - Auditor(s) take time to consolidate notes and confirm audit findings 	
6:30	<p>Closing Meeting</p> <ul style="list-style-type: none"> - Presentation of General audit finding - Presentation of all non-compliances and opportunities for improvement - Fix timetables for corrective actions - Reiterate SCS appeal policy - Questions 	Management

End of Day 1		
Time	Element/Activity	Personnel
June 11, 2020	Remote Point of Origin Audits	
9:00	Point of Origin Remote Audit #1 <ul style="list-style-type: none"> - Review of eligibility of material - Review of process flows and feasibility of production - Review of declarations of outgoing material - Review of feedstock specific requirements 	
12:00	Point of Origin Remote Audit #2 <ul style="list-style-type: none"> - Review of eligibility of material - Review of process flows and feasibility of production - Review of declarations of outgoing material - Review of feedstock specific requirements 	
16:00	Closing meeting (if additional findings need to be discussed)	Management
End of Day 2		

2.3 Documentation Submitted by Operator

PG-00 Manual de Sostenibilidad	Internal audit checklist
Plan de Gestión de la Sostenibilidad (ESMP)	RSB Risk Assessment
POG 02 (POG - General operating procedure) "Balance de Masa" (Mass Balance)	Training records
POG 04 "Comunicaciones y uso de la marca RSB" (Communications and Claims)	PG-03 "No confirmades, acciones correctivas y preventivas" (Grievance mechanism)
PO-01 "Trazabilidad" (Traceability)	PG-02 "Control de la documentación y registros" (Record Keeping)
GHG Calculations for SCS audit	REACH registration of products
Activity code	Environmental Monitoring and Control Plan
Environmental Authorization	Environmental Impact Assessment and corresponding updates
Waste management procedures POG-01 and POG-02	

2.4 Evaluation of Management System

2.4.1 Capacity of the participating operator to implement its management systems

Note: include an overall evaluation of the participating operator’s responsiveness and ability to consistently and effectively implement its management system based on the financial, technical, and human resources available.

Overall evaluation of management system implementation discussed in the table in Appendix 2 (the details of the observations and substantiating evidence collected during evaluation of the central management office and management systems of the participating operator)

2.4.2 Evaluation of RSB compliance claims and use of RSB trademarks

<p>The RSB short claim, as defined in RSB-PRO-50-001</p>	<p>Material Certificado RSB / RSB certified material.</p>
<p>Any other claims used as per RSB-PRO-50-001</p>	<p>Plastic Energy will make the following claims, which have been revised: In Spanish: o "Este envío/lote está certificado como conforme con los estándares RSB ". o "Este envío/lote contiene material que cumple con los estándares RSB". o "En la documentación asociada, este material es trazable por separado del material que no cumple con los estándares RSB ". o "En el proceso de producción de material, este material es trazable en masa física y en la documentación asociada por separado de material que no cumple con los estándares RSB". Or in English: o This consignment/lot/batch of material is certified as compliant with RSB Standards." o "This consignment/lot/batch contains material which is compliant with RSB Standards." o "In the associated documentation, this material was tracked separately from material not compliant with the RSB Standards." o "In the material production process, this material was tracked in physical mass and in associated documentation separately from material not compliant with the RSB Standards."</p>
<p>Does Operator use RSB trademarks on off-product or on-product claims?</p>	<p>The operator has covered both types of claims (see above) in its procedures, but in practice the operator said to intend to use main off-product and RSB trademarks in product associated documentation.</p>

2.5 Stakeholder Consultation Process (for Main audits)

In accordance with SCS and RSB protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. The primary purpose of such consultation is to solicit input from affected parties as to the strengths and weaknesses of the Participating Operator’s management system and operations, relative to the standard, and the nature of the interaction between the company and the surrounding communities.

Principal stakeholder groups are identified based upon the certification scope of the participating operator.

Stakeholder consultation activities are organized according to the requirements of the RSB. The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

2.5.1 Summary of Stakeholder Comments and Responses (for Main audits)

Stakeholder Comments
Economic Concerns
<p>The stakeholders sample could only speak superficially about such economic concerns and nothing relevant was observed. One supplier (PoO sampled, not in the stakeholders list) did express doubts of the plants economic viability considering their current production, the group’s staffing, and part of the process (the distillation process that transforms the intermediary product obtained -pyrolysis oils- into the refined recycled naphtha and recycled diesel fractions). However, the facility is in early stages of operation.</p>
Social Concerns
<p>The labor representative was the best placed to identify any concerns and nothing was raised besides the acknowledgment that i) t is a young project with some challenges, ii) but payment conditions were negotiated at sector level and are complied with and have been readjusted-renegotiated as needed, and iii) all management and staff were willing to make the project work.</p>
Environmental Concerns
<p>The labor representative mentioned some issues with the installed extruders that had a negative impact in the amount of particles in the air. This was being addressed and the operator was working together with Fremap, the entity that verifies the levels of certain contaminants. During the P&C audit, nothing was mentioned regarding the extruder.</p>

3.0 RISK ASSESSMENT RESULTS

Based on the most recent self-risk assessment the PO's risk assessment results are (The number):	Corresponding risk class (low, medium, high):	Date of risk assessment (must be no older than 3 months from the audit date)	Auditor's assessment of Operator's risk
8 (revised by auditor to 14)	Low (revised by auditor to Medium)	13 May 2020	The auditor has increased the risk class to medium

If risk assessment deviates:

Risk Assessment #	Risk Assessment Topic	PO's assessment	Auditor's assessment and explanation
C	1	PO had not realized that its suppliers (ie. The four Points of Origin in the list provided to SCS) are part of the scope. Therefore, the PO considered that it was the only entity under the scope.	Auditor verified in the two PoOs audited as sample that Plastic Energy maintains oversight of its providers and maintains frequent contact and visits to ensure all plastic waste supplied meets technical specifications required by the process. Risk level increased from low to medium.
C	2	See Auditor's assessment and explanation	The PO had not understood well the RSB accounting and tracking system that needs to set up, therefore this question could not be answered correctly. The answer to this question depends on how the operator addresses a Major NC that covers the development of an adequate tracking system for RSB. Risk level increased from low to medium, since the outcome cannot yet be estimated at this point.

4.0 RESULTS OF THE EVALUATION

4.1 Process of Determining Compliance

4.1.1 Structure of Standard and Degrees of Non-Compliance

RSB-accredited biofuel standards consist of a three-level hierarchy: the principle, the criteria that correspond to that principle, and then the performance indicators that elaborate upon each criterion. Consistent with SCS Sustainable Biofuels Program evaluation protocols, the team collectively determines whether or not the subject operation is in compliance with every applicable indicator of the relevant sustainable biofuel standard. Each non-compliance must be evaluated to determine whether it constitutes a major or minor non-compliance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in non-compliance. The team therefore must use their collective judgment to assess each criterion and determine if the Operator is in compliance. If the Operator is determined to be in non-compliance at the criterion level, then at least one of the applicable indicators must be in major non-compliance.

4.1.2 Interpretations of Findings

Major Non-compliances, either alone or in combination with non-compliances of other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant RSB Criterion. These non-compliances must be resolved or closed out before a certificate can be awarded. If Major NCs arise after an operation is certified, the timeframe for correcting these non-compliances is typically no more than three months. Certification is contingent on the operator’s response to the NCs within the stipulated time frame.

Minor Non-compliances are typically limited in scale or can be characterized as an unusual lapse in the system. Most minor NCs are the result of a non-conformance at the indicator-level. Non-compliances must be closed out within a specified time period of award of the certificate.

Opportunity for Improvement is an observation made which does not fully impact compliance but could potentially affect the PO’s ability to comply with RSB requirements in the future.

4.1.3 Major Non-compliances

<input type="checkbox"/>	No major NCs were issued to the Operator during the evaluation. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input checked="" type="checkbox"/>	Major NCs were issued to the Operator during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.

<input type="checkbox"/>	Major NCs were issued to the Operator during the evaluation and the Operator has not yet satisfactorily closed all major NCs.
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4.1.4 Non-compliances (NCs) and Current Status

Summary of Non-compliances and Current Status				
NC Number	Type of NC	Relevant RSB Standard & Indicator No.	Summary of Finding and Evidence Collected	Status of Non-compliance (Open/Closed)
2020-1	Major	RSB-STD-30-001 (Version 3.1), section 1.3 Checklist requirements:1. 2, 1.3, 1.4, 1.5, 6.2.2.	<p>The auditor could not verify a written definition of the certification scope that includes, as per the standard requirement, including:</p> <ul style="list-style-type: none"> - management representative with the overall responsibility for RSB compliance - details of sites where RSB-compliant products are produced, processed, acquired, handled and forwarded (name, geographic coordinates, position in supply chain, details of the local management representative, total surface, description of production steps, product type /specification, applicable RSB standards and procedures, applicable Chain of Custody tracking models. <p>A description with all relevant activities and operations is missing in the RSB procedures, including the different organizations involved, how they are connected to each other (this should include all points of origin under the scope, subcontractors that treat the waste plastic, and the steps in the supply chain covered by each organization). Information is needed also about governing bodies as it relates to RSB and the different entities under Plastic Energy’s group.</p> <p>Action Plan provided Aug 10, 2020</p> <p>Evidence reviewed:</p> <p>Manual de Sostenibilidad Rev.3, sections 2.1., 3, 5, 6.1, and 7.1</p> <p>Modification of the Sustainability Manual and applicable Procedures was amended to include information on the Management Representative</p>	Closed. Due Sep 10, 2020

			<p>(6.1), governing bodies (6.1), RSB compliant products (3), production sites (including point of origin that also does pre-treatment (2.1) and description of relevant activities (including pre-treatment) (7.1).</p> <p>Sustainability Manual Rev 4 further updated to only include TACOIL as an RSB certified product.</p>	
2020-2	Major	<p>Checklist requirements: 2.2, 2.4, 3.3, 5.2, 5.3</p>	<p>Management representatives required by RSB have not been identified</p> <p>Action Plan provided August 10, 2020</p> <p>Evidence reviewed:</p> <p>Manual Updated: Manual de Sostenibilidad Rev.3, section 6.1:</p> <p>1. States that there is a position called Representative of the Management in ISCC and RSB. This person is responsible for ensuring compliance with the RSB systems and with all the requirements of the standards. (Standards Checklist requirement 2.2, 5.2)</p> <p>The Permitting and Certification Manager is responsible for managing risk (Standards Checklist requirement 2.4, 3.3)</p> <p>The Plant Manager (with the information provided by the Shift Managers) and the Head of Plant Administration are the people in charge of obtaining and recording the data required for the maintenance of the records of the affected materials in accordance with the provisions of the Traceability and Mass Balance procedures (Standards Checklist requirement 5.3).</p> <p><i>2020-1005 RSB responsible Document List</i> provided indicating the names of the individuals responsible for RSB standard implementation.</p>	<p>Closed.</p> <p>Due Sep 10, 2020</p>
2020-3	Minor	<p>Checklist requirement: 3.2</p>	<p>The self-risk assessment has been updated to reflect additional risks not identified by the operator and as a result, overall risk is medium: C1 -medium risk, C2 -system not yet defined.</p>	<p>Due: Next Audit</p> <p>Closed.</p>

			<p>B1 risk management in ESMP must be revisited.</p> <p>Action Plan provided August 10, 2020</p> <p>Evidence reviewed:</p> <ol style="list-style-type: none"> 1. Updated self-risk assessment showing medium risk 2. ESMP updated to say “B1 –This risk will become low when the implementation of the ISO 9001 and 14001 system is audited by an independent external company.” 	
2020-4	Major	Checklist requirement: 2.3	<p>Policy covered in "Procedimiento Operativo General Trazabilidad", section 3.2. Roll-out of training to employees will be purposely carried out after the audit to ensure they are trained on an audited RSB system.</p> <p>Action Plan provided August 10, 2020</p> <p>Evidence reviewed:</p> <p><i>2020-0910 lista asistentes, formación inicial RSB</i> provided, which is an attendance sheet of attendees and their positions. Training took place Sep 9 -10, 2020.</p>	<p>Closed.</p> <p>Due Sep 10, 2020</p>
2020-5	Major	<p>RSB-STD-20-001 (Version 3.1), section F.1, F. 3.4</p> <p>Checklist requirement: 5.1, 5.3, 6.4, 6.5, Requirement 8</p>	<p>The operator has a traceability system in place for its own operations and the infrastructure and procedures are adequate. However, the traceability system is not yet complete for RSB and lacks a specific tracking system to adequately identify and forward the RSB certified product.</p> <p>The specific ChoC system and accounting system that will be used has not been clearly identified in the scope.</p> <p>Employees and third parties involved in the chain of custody system are identified and documented.</p> <p>Action Plan provided August 10, 2020</p> <p>Action plan indicates Modify the current informatic accounting system (PROCONSI) to be</p>	<p>Closed.</p> <p>Due Sep 10, 2020</p>

			<p>able to track and adequately identify and forward the RSB certified product.</p> <p>Evidence reviewed:</p> <ol style="list-style-type: none"> 1. 2020-0716 sales delivery notes list RSB.pdf. This document is sales records indicating material sold is RSB certified. It demonstrates the system’s capacity for tracking certified material is (Standards Checklist requirement 5.1). 2. 2020-0716 sales list RSB.pdf. This document is to list all material sold as RSB during a specific period. It demonstrates the system’s capacity for tracking certified material is (Standards Checklist requirement 5.1). 3. 2020-0716 total sales per certification.pdf. This document tracks incoming material into certification categories including RSB. It demonstrates the system’s capacity for tracking certified material (Standards Checklist requirement 5.1, 6.5). 3. Manual de Sostenibilidad Rev.3, sections 2.1 now lists the points of origin in scope (Standards Checklist requirement 5.3) <p>Further, Section 3 of this manual identifies ‘Product Segregation’ as the chain of custody method for RSB (Standards Checklist requirement 6.4).</p> <ol style="list-style-type: none"> 4. Auditor verified that RSB input materials are adequately tracked by the IT System Golden, and outgoing material is adequately tracked by PROCONSI. 5. Specific Chain of Custody system chosen was Physical Segregation. Auditor successfully audited Requirement 8: 8.2. Requirements for Product Segregation Chain of Custody Systems; checklist was updated. 	
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2020-6	Observation	Checklist requirement 14.13.1	The operator has developed a procedure that guides RSB related communications and claims according to the RSB standard. The operator may carry out communication actions related to RSB. However, since the communications strategy is not yet clear and no templates or specific samples of uses of the RSB trademarks are available it is recommended that any use of RSB trademarks is first communicated to SCS to ensure compliance.	Open
2020-7	Observation	Checklist requirement 1.9	Self-evaluation was carried out but major NCs were not identified. For upcoming self-evaluations, the internal audit system must be able to capture these.	Open
2020-8	Observation	Checklist requirement 4.1	A grievance mechanism has been put in place according to RSB Grievance procedure. However, it is not clearly stated how this grievance mechanism is accessible to all RSB stakeholders.	Open
2020-9	Major	Checklist requirement 12.5.2	<p>Through reviewing processes, it is clear that Plastic Energy Almería is a first collector and not only a PoO, as they also collected pre-sorted materials from other points of origins. Therefore, a mass balance must be kept at the level of Plastic Energy Almería.</p> <p>Action Plan provided August 10, 2020</p> <p>Evidence reviewed: Mass balance for Plastic Energy Almería reviewed indicating the volume of material that was sent to Plastic Energy Sevilla (PO)</p>	<p>Closed.</p> <p>Due Sep 10, 2020</p>

5.0 CERTIFICATION DECISION

Certification Recommendation		
For Initial and Re-certifications: Operator to be awarded RSB certification subject to the minor non-compliances stated in Section 4.2.5.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
For Surveillance Audits: Operator is to continue as an RSB certified Participating Operator subject to the minor non-compliances stated in Section 4.2.5.	Yes <input type="checkbox"/> No <input type="checkbox"/>	
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Responsible Biofuels Program evaluation protocols. If certification is recommended, the Operator has satisfactorily demonstrated the following without exception:		
Operator has addressed any Major NC(s) assigned during the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No Major NCs issued <input type="checkbox"/>	
Operator has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards are met over the sites and facilities covered by the scope of the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Operator has demonstrated that the described system of management is being implemented consistently over the sites and facilities covered by the scope of the certificate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments and/or details of any issue which was difficult and/or impossible to evaluate:		
To be completed by Certification Decision-Making Entity	Technical Review by: If different to decision-maker	Inna Kitaychik
	Certification decision:	Participating Operator is certified to the Standards listed in 1.2.2
	Certification decision by:	Inna Kitaychik
	Date of decision: For initial or continued certification	20 November 2020 Report further updated after this date for clarity, with no material impact on the decision
	Surveillance schedule:	1 st Surveillance audit by 20 November 2021 Notes:

Sub Certificate Codes (if applicable)

Legal Entity/Operational Site	Sub-Certificate Code