

# INTERNATIONAL CIVIL AVIATION ORGANIZATION (ICAO) APPLICATION FORM FOR SUSTAINABILITY CERTIFICATION SCHEMES

#### **INSTRUCTIONS**

SCSs should complete the information on this application form and send it by email to officeenv@icao.int.

The form is divided in two parts, as follows:

Part I - Basic information from the Sustainability Certification Scheme (Name, Address, point of contact, among others).

Part II - Compliance evidence on the requirements of the ICAO document "CORSIA Eligibility Framework and Requirements for Sustainability Certification Schemes"

This ICAO document is available on the ICAO CORSIA website (<a href="https://www.icao.int/environmental-protection/CORSIA/Pages/CORSIA-Eligible-Fuels.aspx">https://www.icao.int/environmental-protection/CORSIA/Pages/CORSIA-Eligible-Fuels.aspx</a>).

SCSs should provide evidence of compliance with the requirements laid out in the form (substantiated with e.g. available documents, website links, description of systems and procedures in place by the SCS).

Applications and other information submitted by SCSs will be publicly available on the ICAO CORSIA website, except for materials, which the applicants designate as business confidential.

Additional information may be requested during the evaluation process.

# <u>PART I – BASIC INFORMATION FROM THE SUSTAINABILITY CERTIFICATION</u> <u>SCHEME</u>

# 1. Sustainability Certification Scheme (SCS) identification and contact information

Organisation name: RSB – Roundtable on Sustainable Biomaterials Association

SCS name (include version number where relevant): RSB ICAO CORSIA

Address: c/o The Impact Hub Geneva, Rue Fendt 1, 1201 Geneva, Switzerland

Telephone #: +41 22 534 90 50

Website: www.rsb.org

### 2. SCS representative Information

Full name and title: Rolf Hogan, RSB Executive Director

E-mail address: rolf.hogan@rsb.org

Telephone #: +41 22 534 97 33

Date: Click or tap here to enter text. Apr 29, 2020

Signature: Click or tap here to enter text.

For technical questions on the application, please contact:

Elena Schmidt, RSB Standards Director, E-mail address: elena.schmidt@rsb.org, and

Aurea Nardelli, RSB Technical Advisor and Certification Manager, E-mail address: aurea.nardelli@rsb.org

# PART II – COMPLIANCE EVIDENCE ON THE REQUIREMENTS OF THE ICAO DOCUMENT "CORSIA ELIGIBILITY FRAMEWORK AND REQUIREMENTS FOR SUSTAINABILITY CERTIFICATION SCHEMES"

# 1. Compliance evidence on the requirements for SCS (Table 1 of the ICAO Document "CORSIA Eligibility Framework And Requirements For Sustainability Certification Schemes")

#	THEME	REQUIREMENT
1)	Documentation management	<ul> <li>SCS has a documentation management system that addresses each of the following elements:         <ul> <li>General management system documentation for the SCS CORSIA certification programme (e.g. policies, roles/responsibilities within SCS, etc.)</li> <li>Control of documents.</li> <li>Control of records.</li> <li>Management review of management system.</li> </ul> </li> <li>SCS keeps records for a minimum of 10 years.</li> </ul>

- Standard Operating Procedure (Confidential) "RSB Certification Process" establishes the internal activities of the RSB certification process in compliance with other related RSB system requirements, by defining roles, responsibilities, activities and timelines.
- Standard Operating Procedure (Confidential) "SOP for Assurance Oversight" describes the assurance oversight system in order to monitor the robustness and the practicality of the RSB certification system, evaluate the results gained from the monitoring in order to feed into a continuous improvement of the system
- Standard Operating Procedure (Confidential) "Information Management at RSB" describes the management of information at RSB and includes documents, templates and records. It also includes the review period of documents (also for SOPs) and the archiving period for different types of records.
- Management review of the management system: RSB-PRO-45-001 RSB Risk Management, section 7 on system review

#	THEME	REQUIREMENT
2)	Audit competencies	• The SCS documentation describes in sufficient detail the specific audit competencies requirements and how it is ensured that the requirements concerning auditors' competencies (see Table 5, Requirement 6) are met.

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- RSB-PRO-70-001, requirement F.1.2 " in combination with section G "Auditor Qualification", G.1 requirements for auditors, G.2 requirements for lead auditors and G.3 audit team requirements

#	THEME	REQUIREMENT
3)	SCS Group auditing requirements (where applicable)	<ul> <li>Where the SCS permits group auditing, SCS establishes requirements and provides guidance to certification bodies on:         <ul> <li>Risk-based sampling of units within a group audit, including minimum sample size (see Table 5, Requirement 5) and the threshold for non-compliance.</li> <li>Group management.</li> <li>Process and conditions to join a group.</li> </ul> </li> </ul>

#### **Compliance Evidence**

- RSB-PRO-70-001 clause H.1.5 specifies the auditing requirements for RSB ICAO CORSIA and in which cases a risk-based sampling is allowed. See specifically H.1.5.3 for biomass production
- RSB-STD-12-001 section G.3.4.11 on the calculation of group values
- RSB-PRO-70-001, see section H.2.3. on major and minor non-compliances for the threshold for non-compliance, section H.2.5. on the correction of non-compliances and clause H.3.2.1 on issuing RSB certificates
- RSB-PRO-30-001 for group management, and for process and conditions to join a group see section F.4.3 on operations to be included in the certification scope

#	THEME	REQUIREMENT
4)	Non-compliance with certification requirements	<ul> <li>SCS has documented procedures for addressing when a certified economic operator is found to not comply with the certification requirements. This includes:         <ul> <li>Procedures for withdrawing or suspending certificates and the circumstances under which this occurs.</li> <li>Procedures to ensure that any non-conformities that do not lead to immediate withdrawal or suspension of the certificate are corrected.</li> </ul> </li> <li>SCS makes these procedures available to economic operators.</li> </ul>

- RSB-PRO-70-001, section H.3.7 on Suspension and withdrawal of the certificate
- RSB-PRO-70-001, section H.2.3. on major and minor non-compliances, section H.2.5. on the correction of non-compliances

#	THEME	REQUIREMENT
5)	Monitoring and system review	<ul> <li>SCS has procedures and timelines for reviewing its CORSIA certification programme, including compliance of economic operators, certification bodies and accreditation bodies with the provisions of the programme, to ensure its continuing integrity, adequacy, and effectiveness.</li> <li>Review of the CORSIA certification programme occurs at planned intervals and after significant changes to the CORSIA requirements as specified by ICAO, as well as in response to complaints received, where necessary.</li> <li>SCS uses the results of the review to improve its assurance system where indicated and maintains records of any corrective actions taken.</li> </ul>

- RSB-PRO-45-001 RSB Risk Management see sections 6 and 7
- In addition to the internal review, as a member of the ISEAL Alliance, RSB is regularly (i.e. every 3 years), independently assessed against the ISEAL Assurance Code (see last assessment report "RSB-ISEAL IEM Assurance Narrative Report FINAL" confidential)

#	THEME	REQUIREMENT
6)	Transparency	<ul> <li>SCS ensures that the following information is made publicly available on a website:         <ul> <li>The list of economic operators that are certified under its CORSIA certification programme, including the start and expiry dates of each certificate, and those who no longer participate. Information on the withdrawal or suspension of certificates must be published immediately after the decision has been made.</li> <li>The latest version of SCS CORSIA certification programme requirements.</li> <li>The list of certification bodies that are permitted to conduct audits within the CORSIA certification programme, as well as any certification bodies that are no longer permitted to conduct audits within the programme and those that are temporarily suspended.</li> <li>Publication of contact details for the SCS CORSIA certification programme e.g. telephone number, email address and correspondence address.</li> <li>The names of any other eligible SCS that the subject SCS recognizes within its CORSIA certification programme.</li> </ul> </li> </ul>

- List of certified operators: <a href="https://rsb.org/certification/participating-operators/">https://rsb.org/certification/participating-operators/</a>
- List of program requirements: <a href="https://rsb.org/the-rsb-standard/working-with-the-rsb-standard/">https://rsb.org/the-rsb-standard/working-with-the-rsb-standard/</a> (RSB ICAO CORSIA scheme documents will be displayed similar to the RSB EU RED documents)
- List of recognized certification bodies: <a href="https://rsb.org/certification/auditors-and-assurance/">https://rsb.org/certification/auditors-and-assurance/</a>
- Contact details RSB: <a href="https://rsb.org/about/contact/">https://rsb.org/about/contact/</a>
- Recognition of other systems: see RSB-STD-12-001 section 6

#	ТНЕМЕ	REQUIREMENT
7)	Annual reports	<ul> <li>Recognized SCS submits annually a report to ICAO that includes relevant information.</li> <li>SCS has a procedure in place to collect the information required to fulfil this reporting obligation.</li> <li>SCS records detailed information about the calculation of actual values within their system and provide this information to ICAO on request, in line with the ICAO document entitled "CORSIA Methodology for Calculating Actual Life Cycle Emissions Values".</li> </ul>

#### **Compliance Evidence**

- Standard Operating Procedure (Confidential) "RSB Monitoring, Evaluation (M&E) and Reporting", see specifically section 4.4.
- Standard Operating Procedure (Confidential) "RSB Certification Process"
- RSB-STD-12-001 RSB Standard for ICAO CORSIA, clauses G 5.3 and 5.4
- RSB-PRO-70-001 RSB Procedure for CBs and Auditors, clause H 3.8.2., for actual LCA GHG emissions in combination with RSB-STD-12-001 RSB Standard for ICAO CORSIA clause G 3.3.5 (Documentation requirement)

#	THEME	REQUIREMENT
8)	Risk Management Plan	SCS has a documented plan for addressing the risks to the integrity of the assurance system.

#### **Compliance Evidence**

- RSB-PRO-45-001 RSB Risk Management

#	THEME	REQUIREMENT
9)	Accreditation of certification bodies	<ul> <li>SCS uses an accreditation body complying with ISO 17011 to ensure that certification body requirements listed herein are implemented by the certification bodies.</li> <li>SCS periodically assesses the effectiveness of the accreditation mechanism as part of their system review.</li> <li>SCS has procedures in place that ensure that the accreditation body has the following competencies:         <ul> <li>Knowledge of the five ICAO documents¹ that compose the CORSIA Implementation Element related to CORSIA eligible fuels and the SCS CORSIA certification programme requirements.</li> <li>Competence to review sampling protocols and practice, where this is undertaken by the Certification Body.</li> <li>Competence to review assessment of groups under group auditing procedures, where this is permitted by the SCS and undertaken by the Certification Body.</li> </ul> </li> </ul>

- RSB-PRO-70-001 F.1.1 and F.1.2., in combination with F.2.1. (Accreditation based on ISO 17011 assessing compliance with ISO 17065)
- ASI-POL-10-100 Quality Manual, 4.1 in combination with ASI Summary report ISO 17011 (Compliance with ISO 17011)
- RSB-PRO-45-001 RSB Risk Management, section E 7, in combination with RSB Standard Operating Procedure for Assurance Oversight (on the assurance system review)
- RSB Standard Operating Procedure for Assurance Oversight Section 4.1 (Competencies of the Accreditation Body)

#	ТНЕМЕ	REQUIREMENT
10)	Stakeholder Engagement	SCS has a process for incorporating stakeholder input relevant to the CORSIA sustainability criteria and adequate to the scope and scale of the operation.

#### **Compliance Evidence**

 RSB-PRO-70-001 RSB Procedure for Certification Bodies and Auditors, section H.1.6 (Stakeholder Consultation)

- Standard Operating Procedure (Confidential) "RSB Certification Process", section 4.3 on public consultation

<sup>&</sup>lt;sup>1</sup> These five documents are: CORSIA Eligibility Framework and Requirements for Sustainability Certification Schemes; CORSIA Approved Sustainability Certification Schemes; CORSIA Sustainability Criteria for CORSIA Eligible Fuels; CORSIA Default Life Cycle Emissions Values for CORSIA Eligible Fuels; and CORSIA Methodology for Calculating Actual Life Cycle Emissions Values.

#	ТНЕМЕ	REQUIREMENT
11)	Complaint procedure	<ul> <li>SCS has a documented complaint procedure to respond to complaints received from clients, the public and other stakeholders about its CORSIA certification programme and fraud or potential fraud.</li> <li>SCS has procedures in place for:         <ul> <li>Investigating and responding to relevant complaints, including reporting relevant information, to the oversight body or certification body, as appropriate and in a timely manner.</li> <li>Reviewing the assurance system and taking corrective actions where necessary (see Table 1, Requirement 5).</li> <li>Documenting all complaints received and actions taken for consideration in the system review.</li> </ul> </li> <li>SCS has procedures in place for responding to requests for information from the Committee on Aviation Environmental Protection (CAEP) Sustainability Certification Schemes Evaluation Group (SCSEG).</li> </ul>

- RSB-PRO-65-001 RSB Grievance Procedure
- Standard Operating Procedure RSB Monitoring, Evaluation (M&E) and Reporting (Confidential), see specifically section 4.4.

#	THEME	REQUIREMENT
12)	Transparency on Greenhouse Gas (GHG) reporting and accounting	SCS will provide any information required by the relevant national authority related to GHG reporting.

## **SCS** compliance information

- Standard Operating Procedure RSB Monitoring, Evaluation (M&E) and Reporting (confidential), see specifically section 4.4.
- RSB-PRO-70-001, section H.3.8. (Information) specifies documents that certification bodies have to provide to the RSB Secretariat
- RSB-STD-12-001, section G.5.3 and 5.4. specified information that certified operators have to provide to the RSB Secretariat

# 2. Compliance evidence on the General requirements set by SCS on Economic Operators (Table 2 of the ICAO Document "CORSIA Eligibility Framework And Requirements For Sustainability Certification Schemes")

#	THEME	REQUIREMENT
1)	Documentation management	• SCS requires that economic operators: i) have an auditable documentation management system for the evidence related to the claims they make or rely on for certification; ii) keep records for a minimum of five years; and iii) accept responsibility for preparing any information related to the auditing of such evidence.

#### **Compliance Evidence**

- i) RSB-PRO-30-001 clause F.3.1 requires operators to produce evidence through the means of an auditable documentation management system
- ii) RSB-PRO-30-001 clause F.2.3 requires operators to keep records for at least five years.
- iii) RSB-PRO-30-001 section F.1 describes the content of the Participating Operator Agreement and documentation that the operator has to prepare and provide to the RSB

#	THEME	REQUIREMENT
2)	Transparency on other SCS participation by economic operators	SCS requires all economic operators to declare the names of all SCS under which they are and/or were certified and make available to the auditors all information relevant to those certifications.

### **Compliance Evidence**

- RSB-PRO-30-001, clause F.1.2.4 requires operators to declare the names of all sustainability certification systems under which the PO is and / or was certified and make available to the auditors all information relevant to those certifications

#	THEME	REQUIREMENT
3)	CORSIA certification requirements	SCS requires the economic operator to demonstrate and document that it satisfies all CORSIA requirements specific to the economic operator stated herein, including the following which form the basis for audit objectives:  The fuel under review satisfies the CORSIA sustainability criteria specified [ICAO document "CORSIA Sustainability Criteria for CORSIA Eligible Fuels"];  (where applicable) The default GHG life cycle assessment (LCA) value applied by the economic operator matches the value and associated feedstock and conversion process (pathway) specified by ICAO in the ICAO document "CORSIA Default Life Cycle Emissions Values for CORSIA Eligible Fuels";  (where applicable) The system of the economic operator to calculate GHG emissions for an actual LCA value ensures that:  — The CORSIA LCA methodology specified in the ICAO document "CORSIA Methodology for Calculating Actual Life Cycle Emissions Values" is accurately followed to calculate its actual LCA value.  — The LCA value calculation is complete, accurate and transparent. (where applicable) The actual LCA value calculated by the economic operator is accurate and has been calculated by the economic operator is accurate and has been calculated in accordance with the CORSIA LCA methodology specified in the ICAO document "CORSIA Methodology for Calculating Actual Life Cycle Emissions Values" using the most recent data available.  (where applicable) The emissions credits used to calculate the actual LCA value by the economic operator are accurate, have been calculated in accordance with the relevant CORSIA emissions credit methodology or methodologies, and satisfy all other requirements for emissions crediting, as specified in the ICAO document "CORSIA Methodology for Calculating Actual Life Cycle Emissions Values", Section 6.  In the case of waste or residue feedstocks, the material meets the definition for waste or residues specified by ICAO for CORSIA and can be traced back to the first gathering point [ICAO document "CORSIA Methodology for Calculating Ac

RSB-STD-12-001: See specifically:

- G.1.1. Compliance with RSB Principles & Criteria and G.2 Compliance with CORSIA sustainability criteria
- G.3.1 (General requirements) and G.3.2 specify the requirements for the use of default values
- G.3.3 (General requirements for the calculation of actual values), G.3.4 G.3.6. specify the calculation of actual values by life cycle step
- G.3.7 for the calculation of emission credits, in combination with Annex IV emission credits
- G.3.0., G.3.3.3 for the classification of feedstocks, in combination with Annex III. For the traceability of residues, by-products and wastes see RSB Standard for Advanced Fuels RSB-STD-01-010, section G.2.2. Please see RSB-PRO-70 on requirements for the audit plan (G.1.5.)
- G.3.3.4 in combination with G.4 for requirements related to Low Land Use Change (LUC) Risk Biomass, and RSB-STD-04-001

# 3. Compliance evidence on the Traceability requirements set by SCS on Economic Operators (Table 3 of the ICAO Document "CORSIA Eligibility Framework And Requirements For Sustainability Certification Schemes")

#	THEME	REQUIREMENT
1)	Traceability: Mass balance	<ul> <li>SCS requires economic operators to use a mass balance system that:</li> <li>a) Allows batches of sustainable materials with differing sustainability characteristics to be mixed.</li> <li>b) Requires information about the sustainability characteristics and sizes of the physical quantity (batches) referred to in point (a) to remain assigned to the mixture.</li> <li>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.</li> <li>d) Demonstrates that the product claims are linked correctly to the feedstock quantities claimed.</li> </ul>

## **Compliance Evidence**

RSB-STD-12-001 G.1.2. in combination with RSB-PRO-20-001, see specifically E. Terms and Definitions, F.3.4 on mass balance and Annex I

#	THEME	REQUIREMENT
2)	Traceability: Mass balance system documentation	<ul> <li>SCS requires each economic operator to include, as part of its documentation management system (see Table 2, Requirement 1), a system for documenting the mass balance.</li> <li>SCS requires the economic operator to assign a unique reference/identification number to each batch of certified product sold (also known as batch number).</li> </ul>

- RSB-PRO-20-001, F.1 General Requirements
- RSB-PRO-20-001, Annex I

3) Trace		
1 / 1	s balance of	<ul> <li>SCS requires economic operators to operate the mass balance system at a site level.</li> <li>SCS requires that if more than one legal entity operates on a site then each legal entity that is an economic operator is required to operate its own mass balance.</li> </ul>

### **Compliance Evidence**

- RSB-PRO-20-001 F.3.4.1 and F.3.4.2.

#	ТНЕМЕ	REQUIREMENT
4)	Traceability: Mass balance timeframe	<ul> <li>SCS requires the economic operator to monitor the balance of material withdrawn from and added to the mass balance system.</li> <li>SCS requires economic operators to specify a timeframe over which they will ensure that the mass balance is respected.         <ul> <li>The operator ensures that the balance is achieved over an appropriate period of time no longer than three months. A deficit is not allowed at the end of the period.</li> </ul> </li> <li>At the end of the reporting period, a positive balance can be forwarded to the next reporting period as long as an equivalent physical stock is available.</li> </ul>

# **Compliance Evidence**

### RSB-PRO-20-001, see

- F.3.4.8. for the monitoring of the balance
- F.3.4.9 for the timeframe
- F.3.4.10 on forwarding a positive balance into the next reporting period

# 4. Compliance evidence on the Information Transmission requirements set by SCS on Economic Operators (Table 4 of the ICAO Document "CORSIA Eligibility Framework And Requirements For Sustainability Certification Schemes")

#	THEME	REQUIREMENT
1)	Transmission of information in the supply chain	• SCS requires the economic operator to transmit relevant information necessary to demonstrate compliance with the CORSIA sustainability criteria throughout the supply chain. The information transmitted includes all of the relevant reporting elements listed in Annex 16, Volume IV, Part II, Appendix 5, Table A5-2 for which the economic operator has information. The information is related to a specific physical quantity of material.

## **Compliance Evidence**

- RSB-PRO-20-001, see annex for the general set of information to be transmitted along the supply chain, in combination with RSB-STD-12-001 G.3.3.7 for specifics on the transmission of GHG related information along the supply chain

# 5. Compliance evidence on the Information Transmission requirements set by SCS on Economic Operators (Table 5 of the ICAO Document "CORSIA Eligibility Framework And Requirements For Sustainability Certification Schemes")

#	THEME	REQUIREMENT
1)	Accreditation and Auditing Standards	<ul> <li>SCS requires certification bodies to be accredited to ISO standard 17065 by an accreditation body operating in compliance with ISO 17011.</li> <li>SCS requires that certification bodies are accredited in accordance with Table 1, Requirement 9.</li> <li>SCS requires certification bodies to inform the SCS immediately if the accreditation is suspended, withdrawn or terminated by the accreditation body.</li> <li>SCS requires that certification bodies conduct assessments of GHG LCA values in line with ISO 14064-3.</li> <li>SCS requires that certification bodies conduct audits in line with ISO 19011.</li> </ul>

- RSB-PRO-70-001 F.1.1 and F.1.2., in combination with F.2.1. (Accreditation based on ISO 17011 assessing compliance with ISO 17065)
- ASI-POL-10-100 Quality Manual, 4.1 in combination with ASI Summary report ISO 17011 (Compliance with ISO 17011)
- RSB-PRO-70-001 F.2.7. (Suspension) and F.2.8. (Withdrawal or termination)
- RSB-PRO-70-001 F.1.3. (Assessment of GHG calculations in line with ISO 14064-3)
- RSB-PRO-70-001 F.1.2 (audits in line with ISO 19011)

#	THEME	REQUIREMENT
2)	Audits	<ul> <li>The SCS requires that certification bodies being recognized within its CORSIA certification programme, apply the audit objectives to meet CORSIA certification requirements (Table 2, Requirement 3).</li> <li>Initial audits should be performed on-site.</li> <li>SCS may permit remote audits by the certification body under the following conditions: <ul> <li>The audit risk as assessed by the certification body is low.</li> <li>The same level of assurance can be achieved with remote audits as with on-site audits.</li> <li>Sufficient traceability (mass balance) records, greenhouse gas data and other forms of appropriate evidence are available.</li> <li>The systems in place for collecting and processing traceability and greenhouse gas data and ensuring data quality are reliable.</li> </ul> </li> <li>It is the responsibility of the certification body to define the size of the sample of mass balance or GHG data to audit in consideration of the audit risk and the required level of assurance (see Table 5, Requirement 7).</li> </ul>

- RSB-PRO-70-001 H 1.1.2 in combination with RSB-PRO-70-001 Annex applicable standards for RSB ICAO CORSIA certification (audit objectives)
- RSB-PRO-70-001 H.1.5. (Audit plan) specifies that initial (main) audits have to be performed onsite
- RSB-PRO-70-001 H.1.5 (Audit plan) specifies the conditions for remote audits (see H.1.5.2., 1.5.3) in combination with RSB-PRO-60-001 and the RSB Risk Assessment Tool
- RSB-PRO-70-001 H.1.5.8 and H.1.5.9 (sample for GHG and traceability data)

#	THEME	REQUIREMENT
3)	Transfer from one SCS to another	• Prior to re-certification of an economic operator that was previously found to be in major non-conformity with any other SCS, the certification body will be required to bring this to the attention of the SCS.

#### **Compliance Evidence**

- RSB-PRO-70-001 F.7.6.

#	THEME	REQUIREMENT
4)	Certificate Issuance	The SCS requires that certification bodies issue a certificate to an economic operator only after a positive certification decision is reached confirming that the requirements of the SCS CORSIA certification programme have been satisfied.

- RSB-PRO-70-001 H.3.2.1 (Issuance of certificates when all major non-conformities are closed), in combination with H.2.3.3.3 (Definition of major non-conformities as a non-compliance with a requirement of RSB-STD-12-001

#	THEME	REQUIREMENT
5)	Group auditing (where applicable)	<ul> <li>Group auditing of economic operators by the certification body is permitted under the following conditions:</li> <li>For the following economic operators: producers of raw material, points of origin in the case of waste and residue supply chains, and warehouses or storage facilities under common management.</li> <li>When confirming compliance with the CORSIA sustainability criteria when the areas concerned are near each other and have similar characteristics.</li> <li>For the purpose of assessing the accuracy of the claimed LCA value when the units have similar production systems and products.</li> <li>A sample of at least the square root of the number of group members is audited individually annually or, for wastes and residues, using a risk-based sampling approach providing the same level of assurance.</li> <li>Self-declarations from economic operators are not accepted by the certification body as sufficient evidence to replace audits supporting a group claim.</li> <li>A group value for actual GHG LCA would be permitted as long as the SCS sets the guidelines for how this should be determined.</li> <li>If the conditions for group auditing are not fulfilled, economic operators are audited individually.</li> </ul>

#### **Compliance Evidence**

RSB-PRO-70-001 H.1.5 (Audit plan) describes the entities for which group auditing is allowed (i.e. raw material producers, points of origin, storage sites, aggregators, etc.) in combination with the RSB Procedure for Participating Operators RSB-PRO-30-001 with participating operators having the responsibility to manage the compliance of the operations in the scope of certification.

In RSB-PRO-70-001, see also

- H.1.5.3. for the risk based sampling and additional requirements for a sampling approach (areas to be near each other with similar characteristics and similar production systems for GHG calculation)
- H.1.5.5 for points of origin sampling

RSB-STD-12-001 G.3.4.11. for the calculation of group values

#	THEME	REQUIREMENT
6)	Auditor competencies	<ul> <li>SCS requires that certification bodies appoint competent auditor(s), in accordance with the process set out in ISO 19011.</li> <li>The auditor(s) as a whole, and the independent reviewer, demonstrates knowledge and appropriate necessary skills to conduct audits under the CORSIA eligible fuels framework, in accordance with the audit scope, including:         <ul> <li>Knowledge of the requirements of the SCS CORSIA certification programme and the ICAO CORSIA Implementation Element related to CORSIA eligible fuels.</li> <li>Knowledge of and experience with CORSIA or similar sustainability criteria, mass balance systems, traceability, GHG LCA calculations, and data collection and handling.</li> <li>Knowledge of and experience with appropriate sectors (e.g., agriculture, engineering, etc.).</li> </ul> </li> </ul>

RSB-PRO-70-001 F.1.2 (ISO 19011 compliance), in combination with section G. on auditor qualification, specifically:

- G.3.1. requires the knowledge of regulatory frameworks and specifies the ICAO CORSIA implementation elements
- G. 3.2. on requirements for GHG auditing
- G.1.7. on auditing traceability systems
- G.2.5 and G.2.6. for experience with RSB auditing or similar systems and G.3.3. for additional social or environmental expertise required
- G.2.4 for sector experience

#	THEME	REQUIREMENT
7)	Establishment of a level of assurance	<ul> <li>SCS requires the certification body to conduct all audits to a "reasonable assurance level".</li> <li>SCS requires the certification body to apply a materiality threshold of 5% for traceability (volume of sustainable material sold as compliant) and actual GHG LCA value calculations.</li> </ul>

### **Compliance Evidence**

RSB-PRO-70-001 F.1.5