Round Table on Responsible Soy Association

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This is a public document, for any comments regarding the content of this document or the RTRS Standard please contact the:

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The RTRS official languages are English, Spanish and Protuguese, however in case of any inconsistency between diferent versions of the same document, please refer to the English version as the official one.

Round Table on Responsible Soy Association

RTRS Chain of Custody Standard

I. Introduction

The Round Table on Responsible Soy Association (RTRS), is a global multi-stakeholder organization on responsible soy. www.responsiblesoy.org.

The principal objective of RTRS is to "promote the growth and the use of responsible soy through co-operation with the supply chain and open dialogue between its stakeholders".

The methods used by the RTRS to deliver its objectives include:

a) the development of a standard for responsible soy production and associated mechanisms for verification of responsible soy production. The RTRS Standard for Responsible Soy Production Version 1.0 was developed during 2007-2010, is presented as a series of Principles, Criteria, Indicators and Guidance, and is designed to be used by soy producers to implement responsible production practices, and by certification bodies for field verification. No public claims relating to compliance with the RTRS Principles and Criteria can be made without independent, third party certification, carried out by a certification body that has been authorized by RTRS, and according to RTRS certification requirements.

b) the development of Chain of Custody Standard, which describes requirements related to the control of RTRS certified soy, soy derivatives and soy products along the supply chain, including flows of material and associated claims. The RTRS Chain of Custody Standard was developed during 2010, and is presented as a series of auditable requirements designed to be used by organizations in the soy value chain to demonstrate implemented systems for control of RTRS certified soy, soy derivatives and soy products. No public claims relating to compliance with the RTRS Chain of Custody Standards can be made without independent, third party certification, carried out by a certification body that has been authorized by RTRS, and according to RTRS certification requirements.

In preparing this document, the RTRS recognises that there is a considerable variation in the scale, technical knowledge and organization of producers and supply chain operators throughout the world and so it is imperative that access to certification is given to all growers and supply chain operators in a pragmatic and affordable way.

II. Scope

This document sets out:

a) The requirements for an organization controlling RTRS certified soy, soy derivatives and soy products

b) The respective RTRS Chain of Custody system options available

Date of implementation

This standard becomes effective on 17th November 2017

Date of revision

This standard will be reviewed within one year from the date of implementation

III. Change from previous version of this document

January 2011: amendments in the numbering format, without changes in the content.

March 2011: addition of Module E (and corresponding references), addition of definition on critical control points and minor numbering amendments, and amendment to note B2.1.2.

May 2011: Addition of option of 12 month inventory for 1st year only in Module E.

October 2016-June 2017: Various adjustments in conformity with iLUC Directive (2015/1513) amending the Renewable Energy Directive and Fuel Quality Directive.

IV. How to Use this Document

This is a modular document.

V Definitions applies to the whole document.

VI General Chain of Custody System Requirements for Producers applies only to producers.

VII General Chain of Custody System Requirements for the Supply Chain applies only to the supply chain.

VIII Modular requirements includes different options for Chain of Custody Systems applied both to soy producers and organizations in the supply chain. One or more of these may be implemented in conjunction. The Chain of Custody audit will only cover the modules which the organization has implemented. The modules which have been covered by the audit will be indicated in the scope of the Chain of Custody certificate. The module(s) must be applied in addition to the *VII General Chain of Custody System Requirements for the Supply Chain.*

V. Definitions

Bulk	Where the soy product and non-soy product occupy the same physical space at the same time
CAR	Corrective Action Request
Chain of Custody certificate number	A unique number issued by the Certification Body to an organization that has been positively assessed against the RTRS Chain of Custody Standard.
Chain of Custody certificate scope	The Chain of Custody systems which the organization is operating and have been audited as part of the Chain of Custody audit
Chain of Custody System	The type of chain of custody controls an organization is implementing, for example a mass balance system or a segregated system.
Company	An organization with operational control, including the right to manage and implement changes at a site-level and responsibility for the management and implementation of operational systems. This may include for example legal entities and their majority owned subsidiaries or joint ventures.
Co-products and by products	Multiple outputs of a production process which have commercial value. For example, soy meal and soy oil are co-products from a crushing facility.
Critical control points	All points where there is a risk of uncontrolled mixing or substitution between RTRS certified and uncertified material, or materials from different RTRS Chain of Custody systems
Input material	Soy, soy-derivates or soy-products received by the organization from suppliers. Input material is used for processing (where applicable) and/or supply to customers as output material. This may also include embedded soy products.
Installation	Any processing installation used in the production process. It does not include production facilities that have been intentionally added to the production chain to qualify for the exemption set out in Directive 2009/28/EC article 17. 2. An installation shall be considered to be in operation if the physical production of biofuels or bioliquids has taken place.
Material accounting system	The internal mechanism which an organization uses to track data related to RTRS products. This could be a database for example.
Legal ownership	An enforceable claim or title to an asset or property, and is recognized as such by law. This includes the right to possession, the privilege of use, and the power to convey those rights and privileges.
Major non-conformity	A non-conformity shall be considered major if, either alone or in combination with further nonconformities, it results in, or is likely to result in a fundamental failure: (a) To achieve the objectives of the relevant RTRS Criterion, or (b) In a significant part of the applied management system. (See RTRS Accreditation and Certification Standard for Chain of Custody Certification A 2.4.5)

Minor non-conformity	A non-conformity shall be considered minor if it is a temporary lapse, or it is unusual / non-systematic, or the impacts of the nonconformity are limited in their temporal and spatial scale, and it does not result in a fundamental failure to achieve the objective of the relevant RTRS criterion or another applicable certification requirement. (See RTRS Accreditation and Certification Standard for Chain of Custody Certification A 2.4.5)
Output material	Soy, soy-derivatives or soy-products supplied to customers by the organization. This may also include embedded soy products.
Organization	The entity which is implementing an RTRS Chain of Custody System.
Physical site	A geographical location with precise boundaries within which products can be mixed. A mixture can have any form where consignments would normally be in contact.
Producer	An organization growing soy, i.e. a farmer
Quantity	The quantity of the material as measured by volume or weight. For product transported by ship, this is the volume or weight at ship loading For products transported by truck or train, this is the volume or weight at the weighbridge or scale.
RTRS data	Data which is controlled within the scope of the organization's Chain of Custody Management. At a minimum this includes identification of products as RTRS certified and the type of Chain of Custody system(s) used by the associated with the certification. Other RTRS data could include for example sustainability data.
RTRS claims	The text used to communicate that a product is RTRS certified. RTRS claims differ based on the specific Chain of Custody System used by the organization, as set out in the RTRS Communication and Claims Policy
Segregated system	A Chain of custody system where the certified product is kept physically separate from the un-certified product throughout the entire supply chain.
Sustainability data	A type of RTRS data which may include for example information passed along the supply chain as part of the RTRS EU RED Requirements for Producers/Processors, e.g. the land use where the soy was grown, the country of origin, information about the date installations in the supply chain became operations. It may also include product quality data such as organic or non-gmo characteristics, where these are covered within the scope of the RTRS Chain of Custody system. This information is recorded in the material accounting system and controlled within the scope of the organization's Chain of Custody Management System.

VI. General Chain of Custody System Requirements for Producers

1. Scope

1.1 Applicability of the General Chain of Custody System Requirements for Producers

1.1.1 The General Chain of Custody System Requirements for Producers shall apply to any organization growing soy and making RTRS claims about the soybeans they supply.

1.1.2 Where organizations growing soy also purchase and handle soy grown by third parties, they shall apply the General Chain of Custody System Requirements for the Supply Chain instead of the General Chain of Custody System Requirements for Producers.

2. Handling of RTRS certified material

2.1 Identification of outputs

2.1.1 The organization shall ensure that all invoices[1] issued for soybeans supplied with RTRS claims include the following information:

VI.I. Identification of the organization (e.g. name, address, other relevant information);

VI.II. Identification of the customer (e.g. name, address, other relevant information);

VI.III. Date when the document was issued;

VI.IV. Description of the product;

VI.V. Quantity of the products sold;

VI.VI. The organization's RTRS Chain of Custody certificate number;

2.1.2 If separate transport documents are issued, information sufficient to link the invoice and related transport documentation to each other is available

2.1.3 The organization shall include the same information as required in clause 2.1.1 in the related transport documentation, if the invoice (or copy of it) is not included with the shipment of the product.

2.2 Volume summaries

2.2.1 The organization shall prepare annual volume summaries of the RTRS certified soybeans harvested and supplied to customers.

2.3 Records

2.3.1 The organization shall maintain complete and up-to-date records covering all applicable requirements of the RTRS Chain of Custody standard.

2.3.2 The organization shall implement a record keeping system for all records and reports, including purchase and sales documents, training records, production records and volume summaries. The record retention period shall be specified by the organization and shall be at least five (5) years.

2.4 Products supplied with RTRS claims

[1] Invoices: includes any other trade support documents

2.4.1 The organization shall ensure that RTRS certified products are always supplied with the corresponding RTRS claim on their sales and transport documentation, as set out in the RTRS Communication and Claims Policy.

2.4.2 No product shall be supplied as RTRS or RTRS EU RED compliant prior to the successful completion of an assessment and awarding of a certificate of compliance by an RTRS-accredited Certification Body.

VII. General Chain of Custody System Requirements for the Supply Chain

1 Scope

1.1 Applicability of the General Chain of Custody System Requirements for the supply chain

1.1.1 The General Chain of Custody System Requirements of the RTRS Chain of Custody standard shall apply to any organization throughout the supply chain making RTRS claims about the output material they supply.

2 Chain of Custody Management System

2.1 Responsibilities

2.1.1 The organization shall have an appointed management representative with overall responsibility and authority for implementation and compliance with all applicable requirements of the RTRS Chain of Custody standard.

2.1.2 Staff responsible for implementing the requirements of the RTRS Chain of Custody standard shall demonstrate awareness of the organization's procedures and competence in implementing all applicable requirements of the RTRS Chain of Custody standard.

2.1.3 In cases where the organization seeking or holding certification outsources activities to independent third parties (e.g. subcontracts for storage, transport or other outsourced activities) it shall ensure that such independent third parties comply with the intent and requirements of all applicable requirements of the RTRS Chain of Custody standard.

2.2 Procedures

2.2.1 The organization shall establish, implement and maintain procedures and/or work instructions covering all applicable requirements of the RTRS Chain of Custody standard. The procedures and/or work instructions shall be according to the scale and complexity of the organization.

2.2.2 The organization shall define the personnel responsible for implementing each procedure, together with the qualifications and/or training measures required for its implementation.

2.3 Training

2.3.1 The organization shall establish and implement a training plan according to the qualifications and/or training measures defined for each procedure.

2.4 Records

2.4.1 The organization shall maintain complete and up-to-date records covering all applicable requirements of the RTRS Chain of Custody standard.

2.4.2 The organization shall implement a record keeping system for all records and reports, including purchase and sales documents, training records, production records and volume summaries. The record retention period shall be specified by the organization and shall be at least five (5) years.

3 Material sourcing

3.1 Supplier validation

3.1.1 The organization shall establish and maintain an up-to-date record of all suppliers of RTRS input material, including

a) Identification of the supplier (e.g. name, address, other relevant information)

b) The supplier's RTRS Chain of Custody certificate number

c) The scope of the supplier's Chain of Custody certificate

3.1.2 The organization shall verify the validity and scope of the supplier's RTRS certificate at least every 6 months or when entering into a purchase contract for products.

4 Handling of RTRS certified material

4.1 Identification of inputs

4.1.1 The organization shall check the supplier invoice and supporting documentation to ensure the following :

a) The supplied RTRS material quantities are in compliance with the supplied documentation;

b) The RTRS Chain of Custody system is stated for each product item or for the total products;

c) The supplier's RTRS Chain of Custody certificate number is quoted.

4.2 Critical control points

4.2.1 The organization shall identify and record all critical control points where there is a risk of uncontrolled mixing or substitution between RTRS certified and uncertified material, including cases where the organization seeking or holding certification outsources activities to independent third parties (e.g. subcontracts for storage, transport or other outsourced activities).

4.2.2 Where the organization is simultaneously implementing more than one of the RTRS Chain of Custody system described in the RTRS Chain of Custody standard, it shall identify and record all critical control points where there is a risk of uncontrolled mixing or substitution between materials from different RTRS Chain of Custody systems.

4.2.3 The organization shall ensure that critical control points are managed according to the requirements set out in Chain of Custody System module requirements.

4.3 Identification of outputs

4.3.1 The organization shall ensure that all invoices issued for outputs supplied with RTRS claims include the following information:

a) Identification of the organization (e.g. name, address, other relevant information)

b) Identification of the customer (e.g. name, address, other relevant information)

c) Date when the document was issued;

d) Description of the products;

e) Quantity of the products sold;

f) The applicable RTRS Chain of Custody system used;

g) The organization's RTRS Chain of Custody certificate number;

4.3.2 If separate transport documents are issued, information sufficient to link the invoice and related transport documentation to each other is available.

4.3.3 The organization shall include in the related transport documentation the same information as required in clause 4.3.1, if the invoice (or copy of it) is not included with the shipment of the product.

5 Material accounting and claims

5.1 Accounting

5.1.1 The organization shall identify and document the main processing steps involving a change of material volume or weight, and either measure each subsequent fraction to determine its actual quantity, or specify the conversion factors(s) for each processing step. Where it is not feasible to measure at each processing step, quantities for the total processing steps may be used.

5.1.2 The organization shall specify and document the methodology for calculating the conversion factor(s) and ensure that conversion factors are updated when there are changes to the production process, and at least once a year.

5.1.3 The organization shall operate a material accounting system for recording RTRS data, including input quantities received and RTRS output quantities supplied by the organization. As a minimum this includes the following information for both inputs and outputs:

a) Product description

b) Quantities of RTRS material (by volume or weight)

c) RTRS Chain of Custody System

5.1.4 The organization shall prepare annual volume summaries providing quantities (volume or weight) for each product types and Chain of Custody system, as follows:

a) inputs received

b) inputs used for production (if applicable)

c) inputs still in stock

d) outputs still in stock

e) outputs supplied

5.2 Products supplied with RTRS claims

5.2.1 The organization shall ensure that RTRS certified products are always supplied with the corresponding RTRS claim on their sales and transport documentation, as set out in the RTRS Communications and Claims Policy.

VIII. Modular requirements

The following section (VIII) of the standard includes the RTRS Chain of Custody system modules. An organization must implement at least one of the modules in addition to VII General Chain of Custody Requirements for the Supply Chain above. Several modules can be implemented simultaneously.

The following modules are currently available:

Module A – Mass Balance Chain of Custody

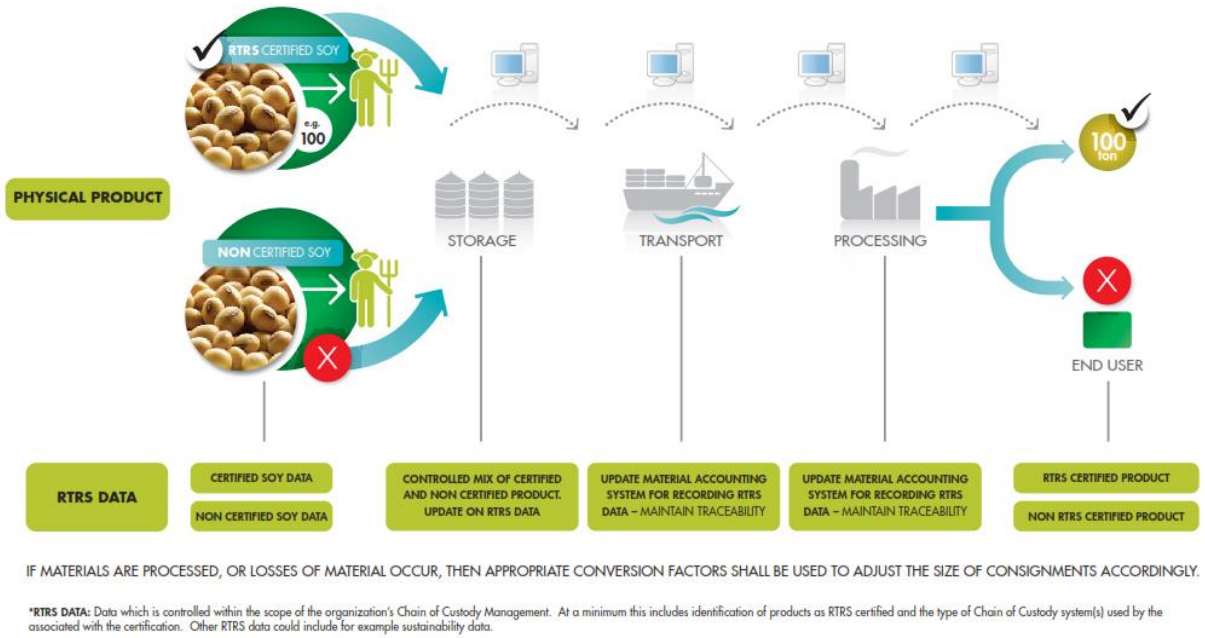
Module B – Segregated Chain of Custody

Module C – Multi-site

Module D – Non-GM

Module E – EU RED

Module A. Mass Balance Chain of Custody: System requirements



A 1. Scope of the system

A 1.1. Applicability

A 1.1.1. The requirements of this module ('Module A. Mass Balance Chain of Custody: System requirements') shall apply to any organization taking legal ownership of RTRS material and making claims about the material outputs supplied to customers being RTRS mass balance material.

A 1.1.2. All requirements in this module (A) shall be applied in addition to the VII General Chain of Custody Requirements for the Supply Chain.

A 1.1.3. The organization shall implement VII General Chain of Custody System Requirements for the Supply Chain and the requirements in this module (A) at the level of a single physical site.

A 1.2. Scope of the Chain of Custody Management System

A 1.2.1. The organization shall ensure that the output of RTRS mass balance material supplied to customers from the physical site does not exceed the input of RTRS mass balance material received at the physical site, using either a continuous accounting system or a fixed inventory period.

A 2. Handling of RTRS certified material

A 2.1. Critical control points

A 2.1.1. Where the organization is simultaneously implementing more than one of the RTRS Chain of Custody System, it shall ensure that inputs into the RTRS mass balance system is RTRS certified material sourced from organizations operating either RTRS mass balance chain of custody systems or RTRS segregation chain of custody systems.

A 2.2. Material accounting system for RTRS data

Inputs

A 2.2.1. RTRS data shall be recorded in the material accounting system by the organization after it has gained legal ownership of the input material, and has ensured the supporting documentation contains the correct RTRS information (see 4.1.1 in VII General Requirements for Chain of Custody Systems for the Supply Chain).

A 2.2.2. The organization shall record the quantity (volume or weight) of RTRS mass balance inputs received. This data shall be recorded as output units, using either the conversion factor(s) for the processing unit or actual measured output quantities.

A 2.2.3. Where the processing or manufacturing process generates co-products, the organization shall record the quantity (volume or weight) of RTRS mass balance inputs received using separate categories for co-products.

A 2.2.4. Where additional sustainability data is associated with the RTRS mass balance inputs received, this data shall remain aggregated and recorded in the material accounting system using separate categories for each identical group of aggregated sustainability data.

Outputs

A 2.2.5. Where the processing or manufacturing process generates co-products, the organization shall deduct the quantity of RTRS data supplied to customers from the respective co-product categories in the material accounting system. The organization shall not apply RTRS data generated from the production of one co-product to a different co-product.

A 2.2.6. Where additional sustainability data is associated with the RTRS material supplied to customers, the organization shall deduct the quantity of data supplied to customers from the relevant category of aggregated data in the material accounting system.

A 2.2.7. The organization shall not supply RTRS data to customers for non-soy, non-soy derivatives or non-soy products. In bulked products, the RTRS data shall only be applied to the proportion of soy, soy derivatives or soy products.

A 2.3. Allocation of RTRS data

A 2.3.1. The balancing of input and output of RTRS data shall be implemented as part of the material accounting system.

A 2.3.2. The organization shall allocate RTRS data to customers using either a continuous balancing system or a fixed inventory period.

A 2.3.3. Records of RTRS data available to allocate to outputs are clearly visible to relevant staff and maintained updated at all times.

A 2.4. Continuous balancing systems

A 2.4.1. Where a continuous balancing system is in operation, the organization shall ensure that the quantity of physical RTRS mass balance material inputs and outputs (volume or weight) at the physical site are monitored on a real-time basis.

A 2.4.2. Where a continuous balancing system is in operation, the organization shall ensure that the quantity of material (volume or weight) at the physical site is at least the same as the quantity of RTRS data (volume or weight) available for allocation to outputs in the material accounting system.

A 2.4.3. Where a continuous balancing system is in operation the organization shall ensure that the material accounting system is never overdrawn. Only RTRS data which has been recorded in the material accounting system shall be allocated to outputs supplied by the organization.

A 2.4.4. Where a continuous balancing system is in operation, RTRS data is valid for 24 months from the date it was first recorded in the material accounting system. If the organization does not allocate the available quantity of RTRS data to outputs within 24 months, the data shall expire and be deducted from the material accounting system.

A 2.5. Fixed inventory periods

A 2.5.1. Where a fixed inventory period is in operation, the organization shall ensure that the quantity of RTRS mass balance material inputs and outputs (volume or weight) are balanced within a fixed inventory period which does not exceed 12 months).

A 2.5.2. Where a fixed inventory period is in operation, the organization may overdraw data when there is evidence that RTRS mass balance purchases are under contract for delivery within the inventory period, to cover the RTRS output quantity supplied.

A 2.5.3. Where a fixed inventory period is in operation, RTRS data which has not be allocated to output material at the end of the inventory period can be carried over and recorded in the material accounting system for the following inventory period. Carried-over RTRS data is valid for 24 months from the date of the inventory. If the organization allocates less than the available quantity of RTRS data to output materials over 24 months, the data shall expire and be deducted from the material accounting system.

A 2.5.4. Where a fixed inventory period is in operation, the organization shall ensure that the material accounting system is not overdrawn at the time of the inventory. Only RTRS data which has been recorded in the material accounting system within the inventory period (including data carried-over from the previous period as per 2.5.3) shall be allocated to outputs supplied within the inventory period.

Module B. Segregated Chain of Custody: System requirements

Summary of System:

This module specifies the requirements for 'segregated' RTRS soy chain of custody systems. In such a system RTRS certified soy, soy derivatives and soy products are kept separate from all non RTRS-certified soy, soy derivatives and soy products. This system allows those taking ownership of material to be certain that the material is (or is made from) soy that originates from RTRS certified farms. Since RTRS-certified material can be mixed with other RTRS-certified material, such a segregation system is not designed to deliver traceability back to a specific farm[2].

B 1 Scope of the system

B 1.1. Applicability

B 1.1.1. The requirements of this module ('Module B. Segregated Chain of Custody: System requirements') shall apply to any organization taking legal ownership of RTRS material and making claims about the material outputs supplied to customers being segregated RTRS material.

B 1.1.2. All requirements in the module (B) shall be applied in addition to the VII General Chain of Custody Requirements for the Supply Chain.

B 1.1.3. The organization shall implement VII General Chain of Custody System Requirements for the Supply Chain and the requirements in this module (B) at the level of a single physical site.

B 1.2. Scope of the Chain of Custody Management System

B 1.2.1. The organization shall ensure that the RTRS Segregated material supplied to customers has been physically segregated from non-RTRS Segregated material at the physical site, and at any other stage under their control (e.g. during storage and transport).

B 2 Handling of RTRS certified material

B 2.1. Critical control points

B 2.1.1. Where the organization is simultaneously implementing more than one of the RTRS Chain of Custody Systems it shall ensure that inputs into the RTRS Segregated system are of RTRS certified material sourced from organizations operating RTRS Segregated chain of custody systems and are not from RTRS mass balance systems.

B 2.1.2. There is an effective system in place that is designed to ensure no intermixing between RTRS segregated and non-RTRS Segregated material, for products where RTRS Segregated claims about the material outputs are being made.

Note: such a system may include for example allocation adjustments (e.g. that the first flow of product through the system following a change from non-RTRS to RTRS material is classed as non-RTRS) or other systems. Flushing of the processing or storage equipment between flows of RTRS and non-RTRS material can be used as such a system, but physical cleaning is not a requirement of this module.

[2] Only Identity-preserved (IP) Chain of Custody systems deliver traceability to specific farms.

B 2.2. Material accounting system for RTRS data

Inputs

B 2.2.1. The organization shall record the RTRS data and the quantity (volume or weight) of RTRS segregated inputs received in their material accounting system after they have gained legal ownership of the input material, and have checked the supporting documentation (see 4.1.1 in VII General Requirements for Chain of Custody Systems for the Supply Chain). This data shall be recorded as output units, using either the conversion factor(s) for the processing unit or actual measured output quantities.

Outputs

B 2.2.2. The organization shall deduct the quantity of RTRS data supplied to customers from their material accounting system based on the actual physical material supplied.

B 2.3. Allocation of RTRS data

B 2.3.1. The organization shall ensure that allocation of RTRS data to customers is consistent with the actual physical product delivered.

Module C. Multi-site Chain of Custody: System requirements

Summary of System:

The multi-site Chain of Custody system is a cost-effective way of implementing CoC certification. A single RTRS CoC certificate is issued covering multiple sites under the control of the same company. The requirements of the RTRS segregated or mass balance CoC systems are implemented at each individual site. The company has a centrally administered multi-site CoC system, called the Internal Control System (ICS), which ensures that the RTRS CoC requirements are implemented at all sites. As part of the ICS, internal audits are carried out at all sites annually.

The certification body audits the systems and documentation of the centrally administered ICS and a sample of participating sites. During the lifetime of the certificate (5 years) the certification body audits all sites participating in the multi-site CoC system at least once.

A company may choose to hold several multi-site certificates e.g. covering particular geographical areas, or types of sites. Separate multi-site certificates are needed where different Internal Control Systems exist or where there is no central administrator of the system.

C 1 Scope of the system

C 1.1. Applicability

C 1.1.1. The requirements of this module ('Module C. Multi-site Chain of Custody: System requirements') shall apply to any company seeking to include multiple sites in an RTRS CoC certification.

C 1.1.2. This module is designed to be used in addition to one or more of the modules for site- based Chain of Custody requirements, including 'Module (A): Mass Balance Chain of Custody', 'Module (B): Segregated Chain of Custody', 'Module (D): Non-GM' or 'Module (D): EU RED'.

C 1.2. Scope of the Chain of Custody System

C 1.2.1. The multi-site CoC system may include different types of operations, geographic areas and types of CoC control systems (e.g. mass balance systems and segregation systems).

C 1.2.2. The company shall define the geographic area, the number of sites, the type of mass balance systems and the type of operations covered by the scope of their multi-site Chain of Custody system.

C 1.2.3. The company shall ensure that the relevant requirements of the RTRS CoC Standard (the general requirements and specific module requirements) are fully implemented at each participating site.

C 2 Chain of Custody Management System

C 2.1. Responsibilities

C 2.1.1. The company shall have a centrally administered and documented Internal Control System (ICS) for the management and implementation of the RTRS chain of custody requirements.

C 2.1.2. The appointed management representative shall have the legal or management authority and technical support necessary to implement the requirements of 'Module C. Multi-site Chain of Custody' for all participating sites.

C 2.1.3. The company shall be responsible for ensuring that any conditions on which certification is dependent and any corrective actions issued by the certification body thereafter are fully implemented.

C 2.1.4. The company shall have the authority to issue internal corrective actions to any participating site.

C 2.1.5. The company shall have the authority to remove participating sites from the scope of the multi-site CoC system if the requirements of participation, or any corrective actions issued by the certification body or by the company itself, are not complied with by the participating site(s).

C 2.2. Training

C 2.2.1. As part of the ICS, the company shall establish and implement training and awareness-raising activities for participating sites, covering the applicable requirements of the RTRS Multi-site Chain of Custody.

C 2.3. Records

C 2.3.1. The company shall keep centralized records of all participating sites and shall be responsible for maintaining the following records up-to-date at all times:

a) List of all participating sites covered by the multi-site certificate, with their names, addresses, appointed site managers and type of operations, together with the date of entry into the multi-site chain of custody programme;

b) Records of the internal audits demonstrating that each participating site meets the eligibility criteria, the requirements of the applicable Chain of Custody modules(s), and any additional requirements of the system;

c) Records of the annual Chain of Custody management system reports (see C4.1.5) and management reviews;

d) The date of withdrawal of any participating site from the multi-site Chain of Custody system, and an explanation why the participating site was removed;

e) Aggregated volume summaries for all participating sites, as per VII General Chain of Custody System requirements for the Supply Chain, 5.1.4.

C 3 Participation in a multi-site chain of custody system

C 3.1.1. The company shall document and implement a procedure with clear rules regarding eligibility for participation.

C 3.1.2. All participating sites shall have a legal and/or contractual relationship with the company requiring regular reporting and communication.

C 3.1.3. All participating sites shall be subject to a common, centrally administered and documented Internal Control System (ICS) for the management and implementation of the RTRS chain of custody requirements, which is subject to continual surveillance by the company.

C 4 Internal audits

C 4.1.1. The company shall carry out an initial internal audit of each site to be included to ensure that they comply with all the requirements of the applicable Chain of Custody Modules and with any additional requirements for participation ***prior*** to being admitted as a participating site within the scope of the multi-site certificate.

C 4.1.2. The company shall carry out an annual internal audit of each participating site to confirm ongoing compliance with all the requirements of certification.

C 4.1.3. Participating sites found to have non-conformances as part of the internal audit shall be issued with time-bound corrective action requests to address the non-conformance. These shall be identified as major or minor non-conformances.

C 4.1.4. Where non conformances are judged to be ***major***, sites shall be excluded from the scope of the multi-site certificate until the corresponding CAR is deemed by the central administrator of the ICS to have been satisfactorily addressed.

C 4.1.5. The company shall prepare an internal annual Chain of Custody management system report on the results of all internal audits as well as on any up-coming changes to the Chain of Custody management system.

C 4.1.6. The annual Chain of Custody management system report (see C4.1.5) shall be discussed, reviewed and approved by top management representatives of the company and the participating sites.

C 4.1.7. A new site shall only be added to the scope of an existing multi-site Chain of Custody certificate if:

a) during an initial internal audit, the site has been found to comply with the requirements of the applicable Chain of Custody Modules and with any additional requirements for participation (as per C4.1.1); and

b) the site has been included in the risk-assessment which is submitted annually to the Certification Body (CB); and

c) the scope of the existing chain of custody certificate already includes another site of the same type (e.g. the same chain of custody system(s) and operation type). If no site of the same type is part of the scope of the existing certificate, the site shall only be included in the scope of the certificate following successful assessment during the next surveillance visit by the CB.

Note: If a site is added to the scope of the certificate after the initial audit or annual surveillance and subsequently removed before the next annual surveillance, this site will be subject to assessment during the next surveillance even though it is no longer included in the scope of the certificate. These requirements are outlined in the RTRS Accreditation and Certification Standard for Chain of Custody Certification.

C 5 Risk assessment

C 5.1.1. Prior to the main certification assessment by the CB the company shall undertake a risk assessment including all sites proposed to be included within the multi-site system, identifying the risk of unwanted and uncontrolled mixing or substitution of RTRS.

C 5.1.2. The company shall provide the nominated Certification Body (CB) with an up to date risk assessment before the initial audit and each subsequent surveillance audit.

C 5.1.3. The risk assessment shall be updated whenever there is a change in operations, and when new sites are proposed for addition to the multi-site certification.

Module D. Non-GM Chain of Custody: System requirements

Summary of the system:

This module specifies the requirements for RTRS non-GM soy supply chains: i.e. for RTRS certified soy, soy derivatives and soy products that are also certified by RTRS as 'Non-GM'.

It contains a section specifically for producers (growers) of Non-GM soy. It also has requirements for the supply chain, including producers, which requires the Non-GM material to be kept separate from all other products throughout the entire supply chain, in order to maintain their status.

The requirements of this document are to be used in conjunction with either the RTRS CoC mass balance requirements (Module A) or the RTRS CoC Segregation requirements (Module B), according to what is requested by the onward supply chain. Mixing of RTRS Non-GM with other certified Non-GM soy material may take place, in which case the 'RTRS data' may be allocated on a 'mass-balance' basis. The Non-GM status of the material cannot be allocated to GM or unknown products.

D 1. Scope of the system

D 1.1. Applicability

D 1.1.1. The requirements of this module ('Module D. Non-GM Chain of Custody: System requirements') shall apply to any organization taking legal ownership of RTRS material and making claims about the material outputs supplied to customers being RTRS Non-GM certified.

D 1.2. Scope of the Non-GM Management System

D 1.2.1. The organization shall ensure that the RTRS Non-GM certified material supplied to customers has been physically segregated at the physical site from GM products or products of unknown status, and is not mixed with GM products or products of unknown status at any other stage under their control (for example during storage and transport).

D 2. Cultivation and harvest (Only applies to soy producers)

D 2.1. Requirements for soy producers

D 2.1.1. The organization growing soy shall ensure that seed material and any other agriculture inputs are from Non-GM strains.

D 2.1.2. The organization growing soy shall maintain certificates of origin, receipts and other relevant documentation for all seed purchased. When their own seed is used from one harvest to the next, records of the origin of the original seed shall be maintained.

D 2.1.3. When machinery (including the planters, harvesters, transporters, etc.) is shared with GM plots or with other producers that may be using GM strains, all machinery shall be thoroughly cleaned before being used on Non-GM plots.

D 2.1.4. The organization growing Non-GM soy shall work with adjacent GM growers to maintain a safe distance from GM crops and implement physical barriers as necessary, to prevent drift of GM material.

D 2.1.5. The soybean harvested shall not contain GMO residues greater than 0.9% (or lower limits if specified by clients).

Note: GM DNA that is not authorized in the receiving country cannot be included, even at low levels of adventitious presence i.e. there is no acceptable level for un-authorised GM DNA in the receiving country.

D 3. Testing Non-GM Status (Applies to soy producers and all organizations in the supply chain)

D 3.1. Requirements for soy producers and the supply chain

D 3.1.1. The organization shall conduct semi-quantitative tests to validate the GM status of soy materials they receive and where the organization is growing soy, of the soybeans they supply. Any laboratory conducting semi-quantitative tests for the presence of GM DNA on their behalf must be competent to do so. Laboratories undertaking PCR tests must be accredited for PCR testing by a recognised Accreditation Body.

Note: It is not expected that individual small-scale producers should be responsible for carrying out DNA tests on their harvest; however in these cases there must be evidence that the first buyer does the testing.

D 3.1.2. A formal risk assessment must be undertaken of the GM presence at the source of the inputs and potential cross-contamination during subsequent handling, transport, storage and processing.

D 3.1.3. The frequency and location of sampling and semi-quantitative testing must be set at the level identified as necessary to establish their Non-GM status.

D 3.1.4. The organization must ensure that the adventitious presence of GM DNA in any input materials supplied to them is <0.9% (or lower levels if specified by clients) adventitious presence of GM DNA.

Note: GM DNA that is not authorized in the receiving country cannot be included, even at low levels of adventitious presence i.e. there is no acceptable level for un-authorised GM DNA in the receiving country.

D 3.1.5. Where DNA is absent or where the DNA is so disrupted as to be undetectable, organizations must demonstrate that the materials have been derived from products or processes of Non-GM status by demonstrating segregation back to the point where DNA testing can be considered valid.

D 3.1.6. For organizations in the supply chain using ships (including barges and coasters), one composite PCR test per hold is set as a minimum requirement for confirming Non-GM status. This requirement is not applicable for soy producers.

D 4. Handling of material (Applies to soy producers and all organizations in the supply chain)

D 4.1. Critical control points

D 4.1.1. Where the organization is simultaneously handling Non-GM and GM products or products of unknown status, it shall ensure that inputs into the RTRS Non-GM system meet the RTRS Non-GM requirements.

D 4.1.2. The organization shall ensure the supporting documentation and test results confirm the non-GM status of the material before it is mixed with other non-GM material on site.

D 4.2. Material accounting system for RTRS data

D 4.2.1. Non-GM data shall not be allocated to GM products or products of unknown status. If this occurs, the material shall lose its non-GM status.

D 4.2.2. Where a segregated chain of custody system is in place for RTRS data, the organization shall ensure that allocation of RTRS data to customers is consistent with the actual physical product delivered, including both RTRS certification and the Non-GM status. The requirements of Module B shall also apply.

D 4.2.3. Where a mass balance chain of custody system is in place for RTRS data, the sustainability characteristics (including the RTRS certified status) can be allocated to Non-GM material, even if the Non-GM material did not originate from an RTRS certified farm. This is only permitted if the Non-GM material meets the RTRS Non-GM requirements. The requirements of Module A shall also apply.

Note: Non-GM data cannot be allocated to GM products or products of unknown status in an RTRS mass balance system.

Round Table on Responsible Soy Association

Module E. RTRS EU RED Mass Balance Chain of Custody: System requirements

Summary of System:

For companies seeking to supply soy, as well as soy-based biomass, biofuels and/or bioliquids to the EU biofuel market, they must implement a mass balance system which includes additional elements, not covered in Module A. In addition to the chain of custody requirements, supply chain operators must also meet the requirements of the RTRS EU RED Compliance Requirements for the Supply Chain. It is important to note that communicating RTRS EU RED data is not the same as making claims about RTRS EU RED compliance. Claims about RTRS EU RED compliance can only be made under specific circumstances laid down in the RTRS EU RED Compliance Requirements for the Supply Chain.

E 1. Scope of the system

E 1.1. Applicability

E 1.1.1. The requirements of this module ('Module E. RTRS EU RED Mass Balance Chain of Custody: System requirements') shall apply to any company seeking to supply soy, as well as soy-based biomass, biofuels and/or bioliquids to the EU biofuel market and wanting to communicate RTRS EU RED data to customers.

E 1.1.2. This module must be implemented in addition to 'Module (A): Mass Balance Chain of Custody' and the 'RTRS EU RED Compliance Requirements for the Supply Chain'.

E 1.1.3. This module can also be implemented in addition to 'Module (C): Multi-site Chain of Custody'.

E 1.2. Scope of the Chain of Custody Management System

E 1.2.1. The organization shall ensure that the output of RTRS EU RED mass balance material supplied to customers from the physical site does not exceed the input of RTRS EU RED mass balance material received at the physical site, using either a continuous accounting system or a fixed inventory period of three months.

E 1.2.2. In case of multi-site certification (See also Module C), each participating site shall operate its own chain of custody system.

E 1.2.3. If more than one legal entity operates on a site, each legal entity is required to operate its own chain of custody system.

E 1.3. In the context of EU RED certification, the mass balance system:

a) allows consignments of raw material or biofuel with differing sustainability characteristics to be mixed;

b) requires information about the sustainability characteristics and sizes of the consignments referred to in point a) to remain assigned to the mixture; and

c) provides for the sum of all consignments withdrawn from the mixture to be described as having the same sustainability characteristics, in the same quantities, as the sum of all consignments added to the mixture.

Sustainability characteristics could include for example:

- Evidence showing compliance with the Directive's sustainability criteria; and/or
- A statement that the raw materials used were obtained in a way that complies with the Directive's land related sustainability criteria; and/or

- A greenhouse gas emission figure; and/or
- A description of the raw material used; and/or
- The statement 'RTRS certified soy – EU RED – Mass Balance'.

Sustainability characteristics shall include information on the country of origin of the feedstock.

E 2. Handling of RTRS certified material

E 2.1. Critical control points

E 2.1.1. Where the organization is simultaneously implementing more than one of the RTRS Chain of Custody Systems, it shall ensure that inputs into the RTRS EU RED mass balance system is RTRS certified material sourced from organizations operating either RTRS EU RED mass balance chain of custody systems or RTRS segregation chain of custody systems.

E 2.2. Fixed inventory periods *(replaces A2.5 in Module A Mass Balance Chain of Custody)*

E 2.2.1. After an economic operator receives RTRS EU RED mass balance certification, the first inventory period for the mass balance may be applied retrospectively up to and including the previous harvest season[3]. Alternatively, it may be applied entirely forward looking, provided it does not exceed three months or include any of the subsequent harvest season. Under no circumstances shall the total first inventory period exceed twelve months.

E 2.2.2. After the first inventory period is finished, the organization shall ensure that the quantity of RTRS EU RED mass balance material inputs and outputs (volume or weight) are balanced within a fixed inventory period which does not exceed three (3) months.

E 2.2.3. Each supply chain operator (harvest, processing, storage) must declare the time period of their inventory to their CB, at the point when they first receive certification (for the first inventory period) or at the beginning of the inventory period (for subsequent periods).

E 2.2.4. Where a fixed inventory period is in operation, the organization may overdraw data when there is evidence that RTRS EU RED mass balance purchases are under contract for delivery within the inventory period, to cover the RTRS EU RED output quantity supplied.

E 2.2.5. Where a fixed inventory period is in operation, RTRS EU RED data which has not be allocated to output material at the end of the inventory period can be carried over and recorded in the material accounting system for the following inventory period. Carried-over RTRS EU RED data is valid for as long as an equivalent quantity of material (volume or weight) is present at the physical site.

E 2.2.6. Where a fixed inventory period is in operation, the organization shall ensure that the material accounting system is not overdrawn at the time of the inventory. Only RTRS data which has been recorded in the material accounting system within the inventory period (including data carried-over from the previous period as per 2.2.3) shall be allocated to outputs supplied within the inventory period.

E 2.2.7. The organization shall ensure that RTRS EU RED compliant products are always supplied with the corresponding RTRS claim on their sales and transport documentation, as set out in the RTRS EU RED Communication and Claims Policy.

[3] Soy harvest season may differ according to geography and climatic conditions of different countries. In South American countries like Argentina, Brazil, Uruguay and Paraguay the harvest season is from February to May approximately.

E 2.2.8. The sustainability characteristics (RTRS compliance) of the feedstock that is processed shall be attributed to products and residues of that process equally.

For instance when 50% of a mixture is RTRS compliant, 50% of all (co)products and residues from that mixture should also be considered sustainable.

The only exception is the allocation of GHG emissions which should follow the rules of EU RED Annex V.

E 2.3. Reporting of GHG Emissions

E 2.3.1. The organization shall clearly indicate whether actual GHG values or disaggregated default values are used for RTRS EU RED material.

E 2.3.2. Whenever actual GHG values are used for soy and intermediary products, emissions shall be reported in g CO_2 eq/ dry ton of soy or intermediary products. Total emissions for final soy biodiesel shall be reported in g CO_2 eq/MJ. Information on GHG emissions shall include accurate data on all relevant elements of the emission calculation formula laid out in EU RED Annex V and Section IX of RTRS EU RED Compliance Requirements for the Supply Chain.

E 2.3.3. Whenever disaggregated default values are used, no emissions shall be reported for soy or intermediary products.

E 2.3.4. The last economic operator in the supply chain shall assign a GHG value to final soy biodiesel by:

- Aggregating actual values, as included in the incoming product documentation. The economic operator shall ensure that all relevant elements of the emission calculation formula are included; or
- Using the EU RED default value for Soy Biodiesel or aggregating default values for each step, as included in EU RED Annex V; or
- Using a combination of actual values and EU RED aggregated default values. For actual values, the economic operator shall ensure that all relevant elements of the emission calculation formula are transmitted.

E 2.4. Date of Operation

E 2.4.1. The organization shall clearly indicate whether the installation, in which the production of soy-derived biofuels or bioliquids is taking place, was in operation on or before 5 October 2015.

E 2.5. Recognition of material certified by another EC-approved scheme

E 2.5.1. Material certified by another EC-approved scheme shall in no case be considered as RTRS EU RED compliant. In no case can material certified by another EC-approved scheme be included, processed or supplied as part of an RTRS EU RED compliant consignment.