

RTRS Chain of Custody Standard

Version 3.0 DRAFT

This is a public document of the Round Table on Responsible Soy Association (RTRS), for any comments regarding the content of this document or the RTRS Standard please contact the:

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The next review is scheduled within the next 5 years at the latest. Earlier reviews might be scheduled upon decision by the Executive Board or as required by ISEAL membership requirements.

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

Version	Date of publication	Change description
V1.1	January 2011	Amendments in the numbering format, without changes in the content.
V2.0	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.
V2.1	May 2011	Addition of option of 12 month inventory for 1st year only in Module E.
V2.2	February 2018	Revision in line with newly added “non-GMO”, “non-Paraquat” and Country Material Balance modules.
V2.3	December 2021	Revision in line with newly added “RTRS Standard on Responsible Corn Production”.
V3.0		TBC

Next revision: This standard will be reviewed within the next 5 years at the latest. Earlier reviews might be scheduled upon decision by the Executive Board or as required by ISEAL membership requirements.

The Round Table on Responsible Soy Association (RTRS)

The Round Table on Responsible Soy Association (RTRS) is a global multi-stakeholder consensus-based decision-making organisation: www.responsiblesoy.org.

The principal objective of RTRS is to promote the growth on production, trade, and use of responsible soy through cooperation with actors in and relevant to the soy value chain from production to consumption in an open dialogue with stakeholders including Producers, suppliers, manufacturers, retailers, financial institutions, civil society organizations and other relevant actors.

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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 cooperation 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.

All items related to soy are also applicable to corn production, processing and products.

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.

Normative reference

The following documents are relevant for the application of this document.

- RTRS Standard for Responsible Soy Production Version 4.0
- RTRS Use of the Logo & Claims Policy Version 5
- RTRS Glossary
- RTRS Certification Requirements for Accreditation Bodies and Certification Bodies Version 5.0

Terms and Definitions

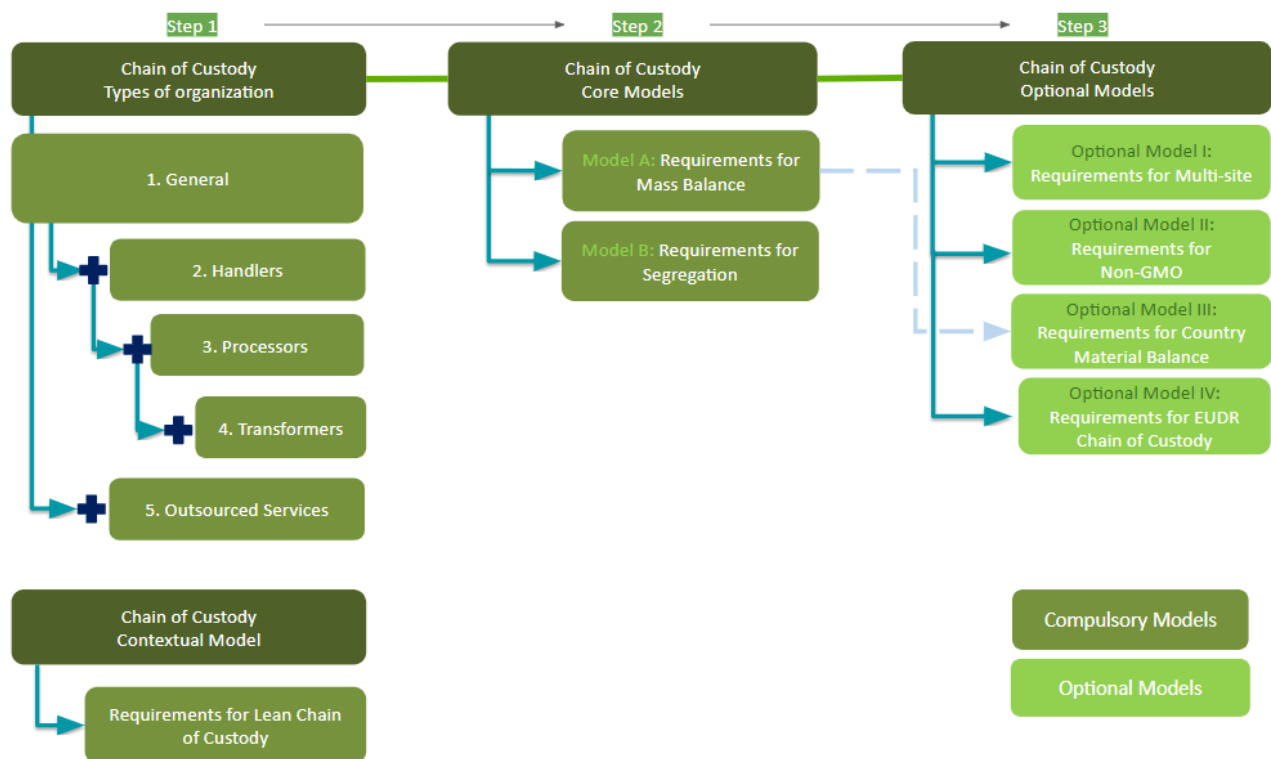
For terms and definitions, please refer to the Glossary. The verbal forms listed below indicate:

- “shall”: a requirement;
- “should”: a recommendation;
- “may”: a permission;
- “can”: a possibility or a capability.

How to Use this Document

This Chain of Custody standard is divided into four main parts: Types of organizations, Core Models, Optional Models and Contextual Model, shown in Figure 1 below. While **Type of organizations, Core Models and Contextual Model, are compulsory models** and all RTRS-certified organizations shall apply if willing to make any claim related to the chosen approach (mass balance or segregation) and the RTRS certified material handled (soy or co-product), the **Optional Models can or can not be applied**, depending on the type of requirements the supply chain organizations will follow and the related claims to them.

Figure 1. Overview of the standard structure



To use this document and understand their applicable requirements, each Chain of Custody organization shall follow three main steps:

Step 1. Choose the Chain of Custody types of organization. The chain of custody types of organization describe the list of supply chain organizations that take ownership or control of a product during production, processing, shipping and commercialization (physically or administratively). The RTRS Chain of Custody Standard considers the complexity of the ‘control’ and the status of blending with other ingredients, ensuring that organizations within the chain of custody meet requirements appropriate to their activities.

Selection of type of organization

The Chain of Custody Standard helps all organizations within the supply chain that go through the certification process to understand which type they are and which requirements they meet.

- **General requirements** are to be met by all organizations within the supply chain, managing soy or corn products, co-products, and their information and data, even those who only deal with soy or corn through paper trail. Examples include but are not limited to re-sellers, purchasing organizations, and all others.
- **Handling requirements** are to be met in addition to general requirements by organizations who undergo a process or set of processes carried out before industrialization, during which the soy or corn products, co-products are kept as they are (there is no changing of the product involved or mixing with other ingredients); for example, storing, cleaning, and drying. Examples include but are not limited to traders, warehouses, cleaners, and co-operatives.
- **Processing requirements** are to be met, in addition to general and handling requirements, by organizations who undergo a process or set of processes for converting soybeans or corn into intermediate or final soy or corn products, co-products; for example, heating, crushing, cooking, expelling, extracting, toasting, milling, degumming, and refining. Examples include but are not limited to crushers, toasters, and biofuel mills.
- **Transforming requirements** are to be met, in addition to general, handling and processing requirements, by organizations who undergo a process or set of processes in which soy or corn products, co-products are used (single or blended) as ingredients or input for products containing embedded soy or corn; for example, homogenization, emulsification, fractioning, mixing, cooking, baking, frying, grinding, centrifuging, filtering, bleaching, pasteurization, sterilization, distillation, concentration, dehydration, cooling, lyophilization, extraction, extrusion, filling. Examples include but are not limited to food product and feed compound manufacturers.
- **Outsourced services requirements** are to be met, in addition to general requirements, by organizations who perform an internal practice as a service, under the responsibility of the certified organization, but do not possess legal ownership of the soybean or soy co-product, or corn or corn co-products. Examples include but are not limited to external warehouses, seaport terminals, tank parks, and logistic companies.

Step 2. Choose the Chain of Custody core models. The RTRS Chain of Custody Standard includes the following traceability systems: mass balance and segregation. The traceability system is selected according to the model that best describes the approach taken to demonstrate the link, physical or administrative, between the certified unit of production and the claim about the final product.

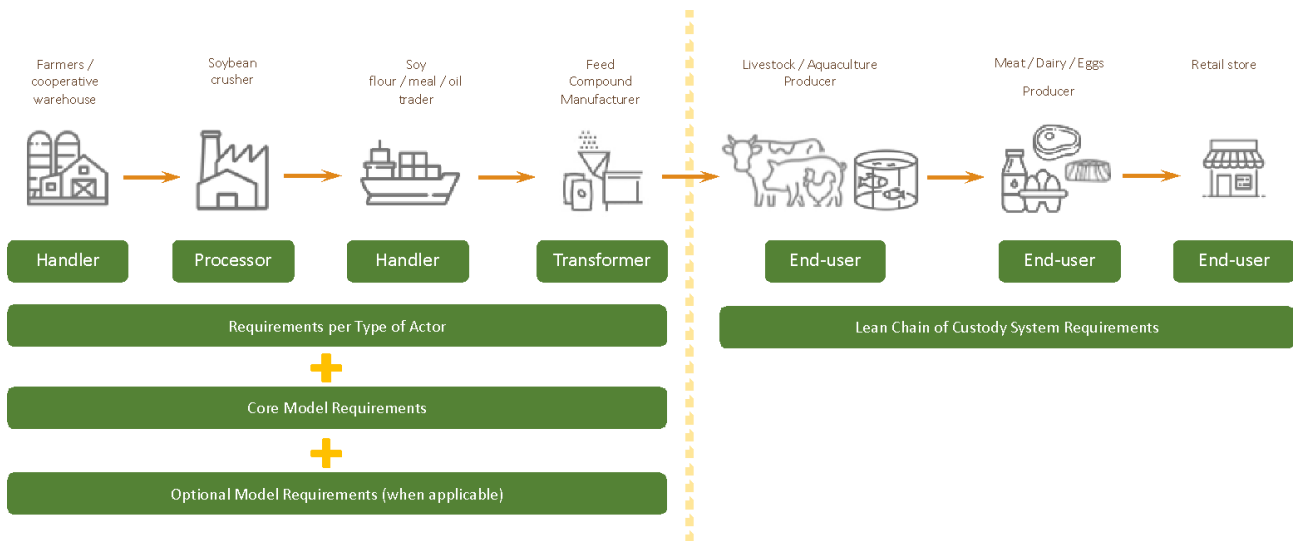
Step 3. Choose the Chain of Custody optional models. These requirements should be followed based on need and individual organization circumstances, such as multi-sites, non-GMO, Country Material Balance, and the European regulation on Deforestation-free products (EUDR) due diligence requirements.

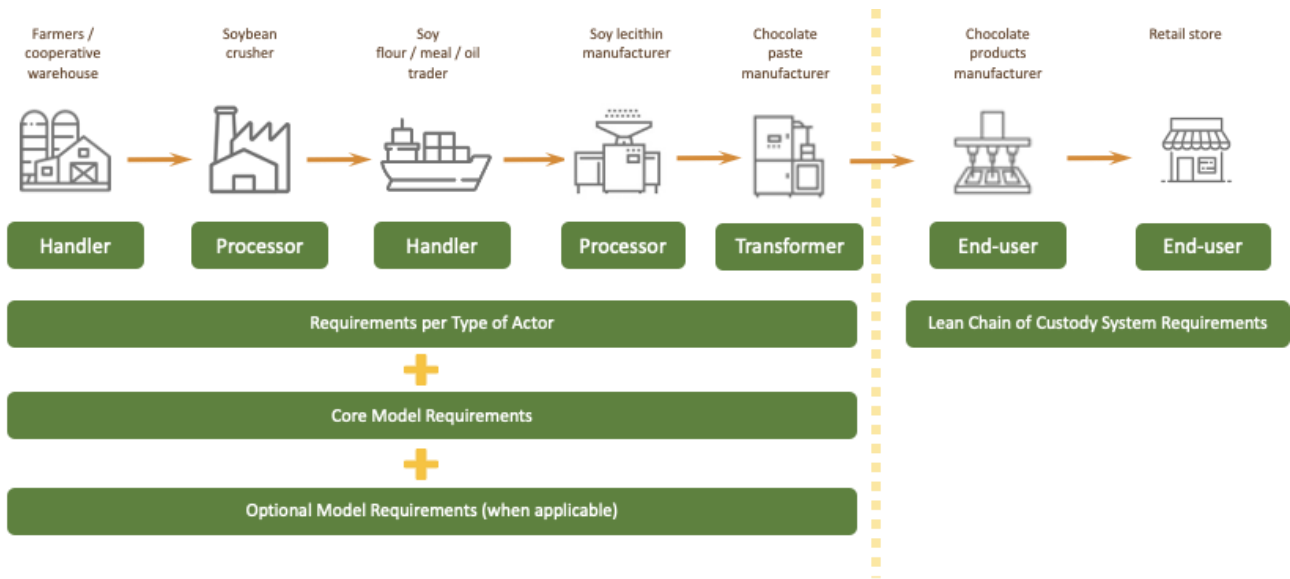
Step 1. Choose the Chain of Custody Contextual Model

This section applies for organizations receiving, handling, and commercializing products containing embedded soy or corn (some examples of these products are feed compounds, animal products such as meat, dairy, and eggs, and baked goods or snack foods). Soy or corn end-users shall comply only with the Contextual Model section: Requirements for Lean Chain of Custody.

Figure 2 below presents an overview of the different types of soy Chain of Custody and the applicable Models.

Figure 2. Types of organization in a soy supply chain and applicable Models

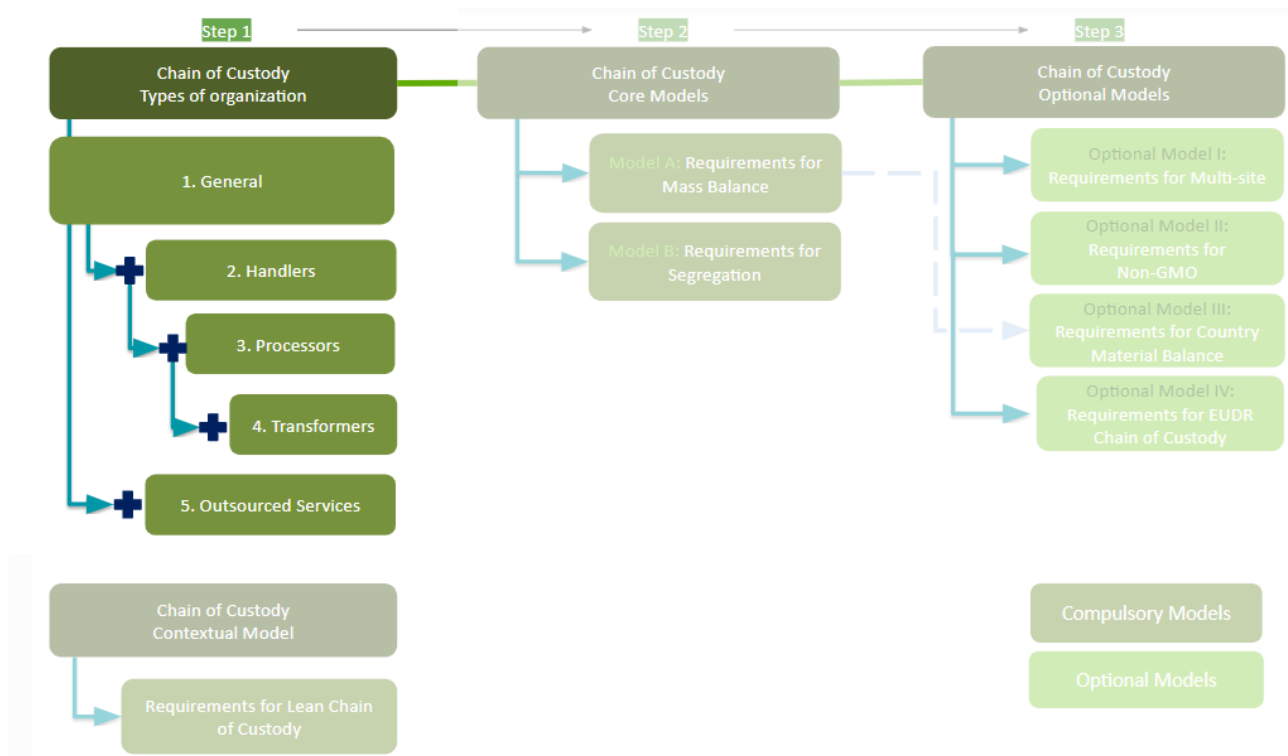




Types of organization

Applicability of the Chain of Custody Types of organization requirements

The Chain of Custody Types of organization requirements shall apply to any organization throughout the supply chain that has legal ownership of RTRS-certified material and for which an RTRS claim is intended, including handlers, processors and transformers. All organization shall meet the general requirements, and, with increasing supply chain complexity, additional requirements become applicable according to the organization’s operations (certain requirements are only applicable for specific Chain of Custody type of organizations) – the corresponding requirements are indicated by the following key:



1. General requirements

Applicability

The requirements in this model apply to all organizations.

1.1. RTRS General Procedure

- 1.1.1. The organization shall implement and maintain a written RTRS general procedure in accordance with the organization's complexity and scope. The procedure shall include at least:
 - 1.1.1.1. implementation of all the elements of the applicable chain of custody model requirements
 - 1.1.1.2. roles of those responsible for implementation and compliance with applicable requirements.
- 1.1.2. The responsible members within the organization shall demonstrate awareness and knowledge of the organization's procedures for the implementation and maintenance of these requirements.
- 1.1.3. The organization shall have a system in place to ensure that incoming material is confirmed as being RTRS certified.
- 1.1.4. The organization shall present a description of how records are kept. The retention period for all applicable records is a minimum of five years.
- 1.1.5. The organization shall have a system in place, which includes quantities and calculations' record keeping, to examine the volumes that are not making double claims and ensure that double counting does not happen. All documents from other certifications shall also be available and reviewed, if applicable.
- 1.1.6. The organization shall use the same supply chain model as its supplier or downgrade the traceability system from Segregation to Mass Balance¹.

1.2. Training plan

- 1.2.1. The organization shall be responsible for identifying training needs for those responsible for implementation and compliance with each of the applicable requirements.
- 1.2.2. A training session shall be provided annually and at least one responsible person shall be trained every year.
- 1.2.3. The training plan shall be documented, and training records shall be kept for a minimum of five years.
- 1.2.4. All relevant people shall be trained in the last version of the standard according to their roles and responsibilities.

¹ Downgrading from Mass Balance to Country Material Balance shall also be possible.

- 1.2.5. The training shall be delivered by a qualified person, with knowledge of the topic, and considered as a third party in the certification process.
- 1.2.6. The training shall include all the relevant requirements from the corresponding type of organization and other applicable models, use and function of the RTRS Soy & Corn Conversion Factors & Footprint Calculator, when applicable, use of the RTRS Online Platform, and the RTRS Use of the Logo and Claims Policy V.5.
- 1.3. **Annual internal audit**
 - 1.3.1. The organization shall conduct an annual internal audit covering all applicable requirements from the type of organization and model of this standard to determine whether they are properly implemented and in compliance.
 - 1.3.2. Non-conformities raised during internal audits shall be duly addressed with corrective actions or corrections in a timely and appropriate manner.
 - 1.3.3. Internal audits records and reports shall be kept and subject to management review.
- 1.4. **Material sourcing – supplier control**
 - 1.4.1. The organization shall provide an up-to-date list of its suppliers, including:
 - 1.4.1.1. Name of the certificate holder,
 - 1.4.1.2. Contact details: postal address, email address,
 - 1.4.1.3. Certified product,
 - 1.4.1.4. Country of production,
 - 1.4.1.5. RTRS certificate number,
 - 1.4.1.6. RTRS Core model
 - 1.4.1.7. Certificate validity
 - 1.4.2. The organization shall ensure its suppliers' certificate validity and scope of the certificates are checked at least at the moment of purchase.
 - 1.4.3. The organization shall ensure the supplier's sale and delivery documentation are checked to confirm that:
 - a) the supplied material type and quantities are in conformity with the supplied documentation;
 - b) the RTRS Core Model is specified for each product (except when the organization receives volumes directly from producer);
 - c) the supplier's RTRS Chain of Custody number is mentioned.
- 1.5. **Material and products records**
 - 1.5.1. The organization shall maintain up-to-date material accounting records (e.g., spreadsheets, production control software) of materials and products within the scope of the RTRS certificate, including as a minimum:

- 1.5.1.1. Input: supplier's sales document number and date, quantities and RTRS Core Model per type of material, and product or material description.
- 1.5.1.2. Output: sales document number, date, quantities, product description, RTRS Core Model.
- 1.5.1.3. Description of the processes, including the losses and residues, and industrial reports with plant efficiency, if available.
- 1.5.2. The organization shall prepare reports of annual volume summaries for each type of product and Core Model (in the measurement unit commonly used by the organization), covering the period since the previous reporting period.
- 1.5.3. The volume summary shall include:
 - 1.5.3.1. inputs received
 - 1.5.3.2. inputs used for production and losses (if applicable)
 - 1.5.3.3. conversion factors* (*Please refer to Annex A for guidance.)
 - 1.5.3.4. inputs still in stock
 - 1.5.3.5. outputs still in stock
 - 1.5.3.6. outputs supplied.

1.6. Sales

- 1.6.1. The organization shall ensure that sales official documents, such as invoices, purchase orders and delivery notes (physical or electronic) issued for products sold as RTRS-certified include the following essential information:
 - 1.6.1.1. Identification of the organization (e.g., name, address, other relevant information).
 - 1.6.1.2. Identification of the customer (e.g., name, address, other relevant information).
 - 1.6.1.3. Date when the document was issued.
 - 1.6.1.4. Description of the products, this includes the trade name and type of product, as well as, where applicable, common and scientific name of the species.
 - 1.6.1.5. Quantity of the products sold.
 - 1.6.1.6. The applicable RTRS Chain of Custody Core Model used.
 - 1.6.1.7. The organization's RTRS Chain of Custody certificate number.
- 1.6.2. If separate transport documents are issued, information sufficient to link the invoice and related transport documentation to each other shall be available.
- 1.6.3. The organization shall include in the related transport documentation the same information as required in requirement 1.6.1 if the invoice (or copy of it) is not included with the shipment of the product.

1.7. Online Platform

- 1.7.1. Each supply chain organization managing, handling, processing, or transforming RTRS soy or corn, or RTRS soy or corn co-products shall be certified under the RTRS Chain of Custody Standard and shall have an account in the RTRS Online Platform to register their transactions.
- 1.7.2. The acquiring and offering organization shall register all transactions of physical RTRS-certified material into the RTRS Online Platform within a maximum time frame of 1 week after the volumes have been received by the next organization in the supply chain. The registration date shall match the associated documents and evidence.
- 1.7.3. The offering organization shall confirm that the acquiring organization is certified under the RTRS Chain of Custody Standard in order to properly register the volumes' transfer in the Online Platform (meaning that the acquiring organizations have an account in the Online Platform as well in order to properly register the volumes' transfer).

*Note: RTRS Credits and physical products are separate and mutually exclusive flows. An organization that buys physical volumes of RTRS-certified material **shall not attempt** to generate its equivalent into RTRS credits in the RTRS Online Platform.*

- 1.7.4. Certified organizations shall redeem volumes in the Online Platform once these volumes are used even if sold as non-RTRS or are no longer in the system.

Note: Certified organizations selling RTRS volumes to non-certified Supply Chain actors without platform accounts must redeem these volumes, informing the “destination” type of RTRS product (f.i. grain; or meal, or oil, etc.) and industry sector (f.i. dairy, feed, etc.). If an organization uses part of the soy (for example meal or oil) for non-RTRS purposes, for example soy oil volumes sold under a different sustainability label, they shall redeem those volumes as well from their material balance, informing “non-RTRS destination or market demand”.

Through all this process, additionally, organizations shall account for the net soy volumes received, and redeem, as well, any volumes lost during transfer. For further information check Annex B RTRS Online Platform (informative).

- 1.7.5. The organization acquiring RTRS-certified material shall check, prior to approving the transaction, if the physical shipment, sales, and delivery documentation received matches the data within the RTRS Online Platform for their specific transaction. Only approved material in the platform shall be commercialised along the supply chain.

1.8. Use of the RTRS Logo and Claims

- 1.8.1. The organization shall apply the RTRS logo and claims on RTRS-certified material following the requirements specified in the RTRS Use of the Logo & Claims Policy V5. The type of RTRS logo and claims shall always correspond to the RTRS logo and claims used on sales documents, as specified in RTRS Use of the Logo & Claims Policy V5.
- 1.8.2. The organization shall present a list of all documents, channels etc. where any RTRS logo and claim is included, and all the evidence needed to prove the correct use of the logo and claims in compliance with the RTRS Use of the Logo & Claims Policy V5.
- 1.8.3. All new artwork and logos shall be shared for approval with the Certification Body prior to its usage and shall comply with RTRS Use of the Logo & Claims Policy V5.

2. Handling Requirements

Applicability

The requirements in this section apply to all handlers in addition to the 1. General Requirements above.

2.1. RTRS General Procedure

- 2.1.1. The organization shall provide a description of the process according to its complexity, indicating critical unmanaged mixing points.

2.2. Accuracy of measurement equipment

- 2.2.1. Whenever there is physical possession of the RTRS-certified material the organization shall ensure all measurement equipment is calibrated at least once a year, preferably by a calibration and testing organization that is accredited for ISO IEC 17025 or equivalent.
- 2.2.2. Records of calibration testing shall be kept for a minimum of five years.

3. Processing Requirements

Applicability

The requirements in this section apply to all processors in addition to the 1. General Requirements and 2. Handling Requirements above.

3.1. Material and products records

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

4. Transforming Requirements

Applicability

The requirements in this section apply to all transformers in addition to the 1. General Requirements, 2. Handling Requirements above and 3. Processing Requirements above.

4.1. RTRS General Procedure

- 4.1.1. The organization shall provide a detailed description of the industrial process for the RTRS material (e.g., lecithin, oil, meal), including a description of soy or corn content in end products and the conversion factors* involved. (*Please refer to Annex A for guidance.)

5. Outsourced Services Requirements

Applicability

The requirements in this section apply to all outsourced services organizations in addition to the 1. General Requirements above.

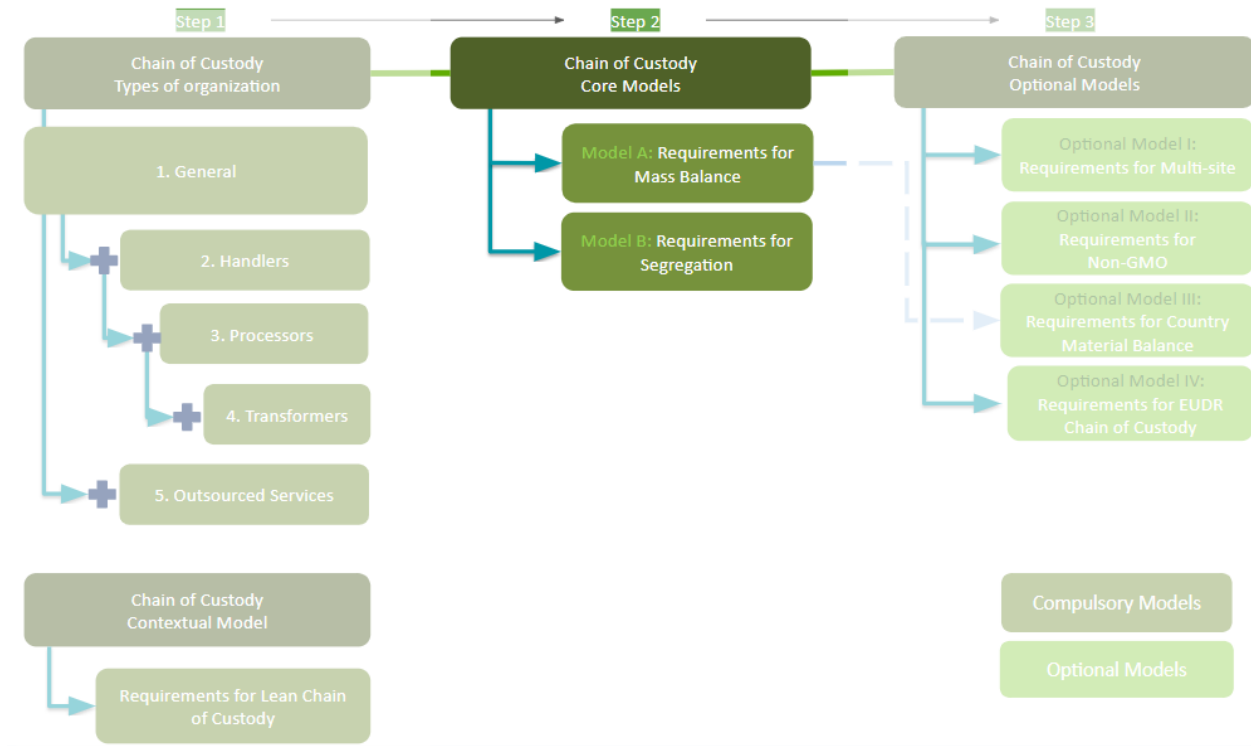
5.1. Outsourced services

- 5.1.1. In cases where a RTRS Chain of Custody certified organization outsources services to external third parties (e.g., subcontractors for storage, transport, or other outsourced activities), the certified organization shall ensure that the external independent third party complies with the requirements of the RTRS Chain of Custody Standard.
- 5.1.2. The RTRS-certified organization shall include requirements for outsourced activities in its RTRS general procedure in accordance with the organization's complexity and scope which shall cover the following at minimum:
 - 5.1.2.1. A list of outsourced activities, service providers and contact details.
 - 5.1.2.2. Detailed instructions on how the incoming and outgoing volumes will be controlled and reported to the RTRS-certified organization by the outsourced organization.
- 5.1.3. A contractual agreement between the outsourced organization and the RTRS-certified organization shall be established covering the following, at minimum:
 - 5.1.3.1. Outsourced organization addresses and legal information.
 - 5.1.3.2. Processes and volumes involved.
 - 5.1.3.3. A statement that the outsourced organization shall not make unauthorized use of RTRS trademarks.
 - 5.1.3.4. A statement that the outsourced organization shall not conduct further outsourcing.

- 5.1.3.5. A statement that the outsourced organization shall accept the right of the certified organization's Certification Body to audit the contractor.
- 5.1.4. The certified organization shall maintain evidence of its legal ownership of the RTRS-certified material under outsourced activities.
- 5.1.5. In cases where a RTRS Chain of Custody certified organization outsources services to independent third parties an inventory with volumes stored at the outsourced site shall be kept and reconciled in the reports of annual volume summaries.

Core Model

The following section of the standard includes the RTRS Chain of Custody Core Model Requirements: Mass Balance and Segregation. At least one of these two core models are to be implemented in addition to 1. Chain of Custody Type Requirements above.



Model A - Mass Balance Chain of Custody

Applicability

The requirements in this model apply to any organization taking legal ownership of RTRS-certified material and making claims about the connection between the certified volumes intake and the RTRS Mass Balance certified material supplied to customers.

A 1 Scope of the Chain of Custody Management System

A 1.1 The organization shall ensure that the output volume of RTRS Mass Balance claimed material supplied to customers from the physical site does not exceed the input volume of RTRS-certified material received at the physical site, using a continuous accounting system.

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 Models, it shall ensure that inputs into the RTRS Mass Balance system are RTRS-certified material sourced from organizations operating either RTRS Mass Balance Chain of Custody Model or RTRS Segregation Chain of Custody Model.

A 2.1.2 Where the organization is simultaneously handling with RTRS-certified and RTRS non-GMO material, it shall ensure that each stream of material is kept separately and outputs correspond to the relevant entering material.

A 2.2 Material accounting system for RTRS data

Inputs

A 2.2.1 The organization shall record the RTRS data and the quantity (volume or weight) of RTRS Mass Balance inputs received in their material accounting system after they have gained legal ownership of the input material and have checked the supporting documentation.

A 2.2.2 The organization shall record the quantity (volume or weight) of RTRS-certified material 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-certified material inputs received using separate categories for co-products.

- A 2.2.4 When sustainability data is associated with the RTRS-certified material received, this data shall be recorded in the material accounting system distinguishing the separate categories of sustainability data attributed to the RTRS-certified material.

Outputs

- A 2.2.5 Where the processing or manufacturing process generates co-products, the organization shall deduct the quantity of RTRS-certified material supplied to customers from the respective co-product categories in the material accounting system. The organization shall not apply RTRS-certified material data generated from the production of one co-product or to a different co-product.
- A 2.2.6 When sustainability data is associated with the RTRS-certified material supplied to customers, the organization shall deduct the corresponding quantity of volume supplied from the material accounting system, even when the volumes were sold with the associated sustainability data but not sold as RTRS-certified material.
- A 2.2.7 The organization shall not supply RTRS-certified material data to customers for non-soy/corn, non-soy derivatives or non-soy/corn products. In bulked products, the RTRS data shall only be applied to the proportion of soy/corn, soy/corn derivatives or soy/corn products.

A 2.3 Allocation of RTRS data

- A 2.3.1 The organization shall implement the correct balancing of RTRS data input and output as part of the material accounting system using the continuous balancing system.
- A 2.3.2 The organization shall keep the records of RTRS data available to be allocated in outputs, shall make them clearly visible to relevant staff, and keep them updated at all times.

A 2.4 Continuous balancing system

- A 2.4.1 The organization shall ensure that the quantity of physical inputs and outputs of RTRS Mass Balance material at the physical site are monitored on a real time basis.
- A 2.4.2 The quantity of material (volume or weight) at the physical site shall be 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 The organization shall ensure that the material accounting system is never overdrawn. Only RTRS data that has been recorded as input (physical volumes) in the material accounting system shall be allocated to the outputs claimed as RTRS by the organization.
- A 2.4.4 RTRS data & volumes shall be valid for 24 months from the date the transaction was registered on the platform and 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 Individual mass balance control

- A 2.5.1 The mass balance control shall only be operated at the site level (mass balance statements shall not be transferred from site to site).

Model B – Segregation Chain of Custody

Applicability

The requirements in this model apply to any organization taking legal ownership of RTRS-certified material and making claims about the connection between the certified volumes intake and the RTRS Segregation certified material supplied to customers.

B 1 Scope of the Chain of Custody Management System

B 1.1 The organization shall ensure that the RTRS Segregation claimed material supplied to customers has been physically segregated from non-RTRS-certified material at the physical site, and at any other stage under their control (e.g. during storage, processing, and transport).

B 2 Handling of RTRS-certified material

B 2.1 Critical control points

B 2.1.1 The procedure shall identify and record all critical points of unmanaged mixing at site level between materials with different RTRS model claims and/or between RTRS certified and non-certified materials and demonstrate control of it.

B 2.1.2 The organization shall provide a site layout showing critical unmanaged mixing points, including outsourced sites, if applicable.

B 2.1.3 Where the organization is simultaneously implementing more than one of the RTRS Chain of Custody Model it shall ensure that inputs into the RTRS Segregated system are of RTRS certified material sourced from organizations operating RTRS Segregated Chain of Custody Model and are not from RTRS Mass Balance systems.

B 2.1.4 The organization shall put in place an effective system that is designed to ensure no intermixing between RTRS segregated and non-RTRS segregated material, for products where RTRS Segregation 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 model.

B 2.2 Material accounting system for RTRS data

Inputs

- B 2.2.1 The organization shall record the RTRS material 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. This data shall be recorded as output units using either the conversion factor(s) for the processing unit or actual measured output quantities.

Outputs

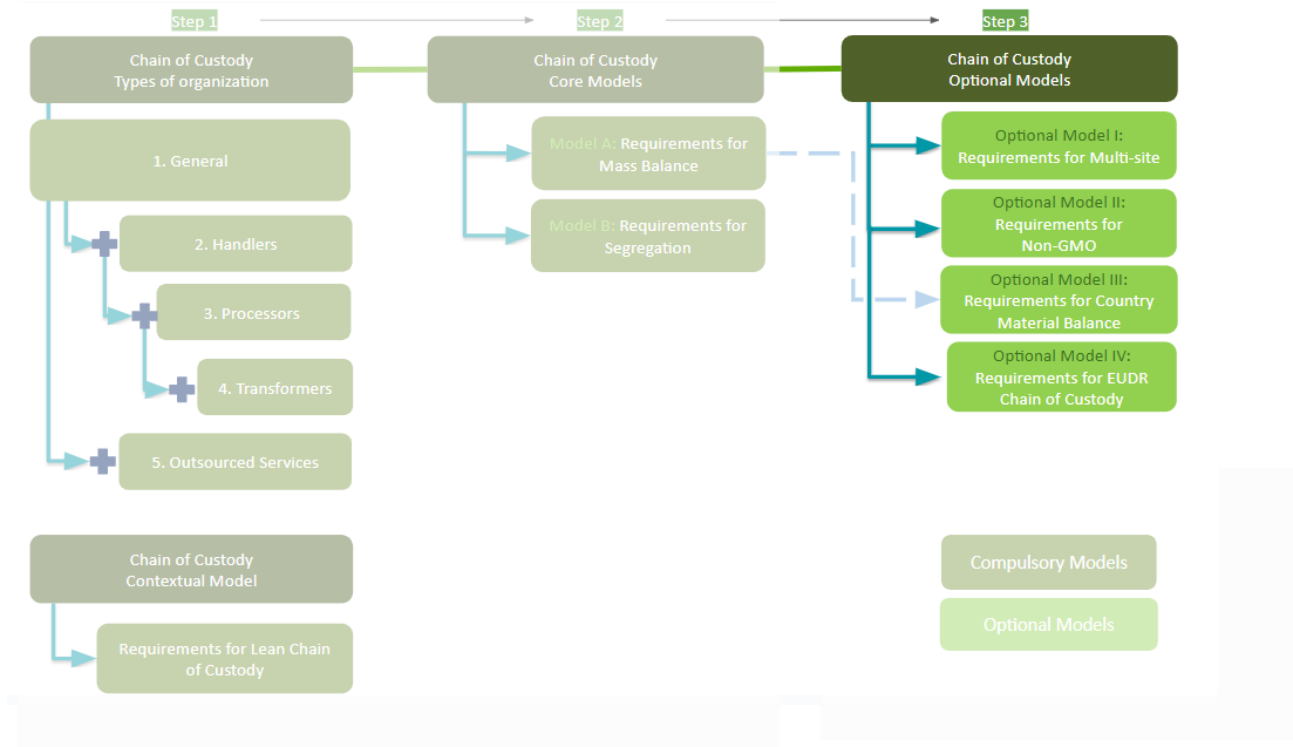
- B 2.2.2 The organization shall deduct the quantity of RTRS material supplied to customers from their material accounting system based on the actual physical material supplied.

B 2.3 Allocation of RTRS data

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

Optional Model

The following section of the standard includes the RTRS Chain of Custody Optional Model Requirements for: Multi-site, non-GMO, Country Material Balance and Alignment with the [EU Regulation on deforestation-free products](#) (hereby EUDR). Any of these models can be selected and are to be implemented in addition to the 1. Chain of Custody Type of organization requirements and to one of the optional models in the 2. Chain of Custody Core Model requirements.



Optional Model I - Multi-site Chain of Custody

Applicability

The requirements of this model apply to any organization seeking to include multiple sites in an RTRS Chain of Custody (CoC) certification system where a single RTRS Chain of Custody certificate is issued covering multiple sites under the control of the same organization. The requirements listed below for this optional model I are to be in compliance in addition to the Type of organization and Core Model A Mass Balance or Model B Segregation Chain of Custody requirements.

I 1 Scope of the Multi-site Chain of Custody Management System

- I 1.1 The Multi-site CoC may include different types of operations, geographic areas, and types of CoC Core Models (e.g., mass balance, and segregation).
- I 1.2 The organization shall define the geographic area, the number of sites, the Core Models and the type of operations covered by the scope of their Multi-site CoC.

I 2 Chain of Custody Management System

I 2.1 Responsibilities

- I 2.1.1 The organization shall be responsible for ensuring compliance with the RTRS Chain of Custody Standard (the requirements per type of organization and core model requirements), at each participating site, including implementation of corrective actions whenever a non-conformity has been issued by the certification body.
- I 2.1.2 The organization shall have a centrally administered and documented Internal Control System (ICS) for the management and implementation of the RTRS Chain of Custody requirements.
- I 2.1.3 The organization shall enable the certification body to perform audits of its procedures and of the documented (ICS) as well as a sample of participating sites (following the RTRS sampling methodology of $\sqrt{\text{total}} * 1.5$). During the lifetime of the certificate (5 years) the organization shall enable the certification body to audit all sites participating in the Multi-site CoC at least once.
- I 2.1.4 The organization shall have the authority to issue internal corrective actions to any participating site.
- I 2.1.5 The organization shall have the authority to remove participating sites from the scope of the Multi-site CoC if the requirements of participation, or any corrective actions issued by the organization itself, are not complied with by the participating site(s).

I 2.1.6 An organization may choose to hold several multi-site certificates e.g., covering geographical areas, or types of sites. Separate multi-site certificates are needed where different Internal Control Systems (ICS) exist.

I 2.1.7 The appointed management representative shall have the legal or management authority and technical support necessary to implement the requirements of this model for all participating sites.

I 2.2 Training

I 2.2.1 As part of the Internal Control System, the organization shall establish and implement training and awareness-raising activities for participating sites, covering the applicable requirements of the RTRS Multi-site CoC.

I 2.3 Records

I 2.3.1 The organization shall keep centralized records of all participating sites and shall be responsible for maintaining the following records up to date at all times:

I 2.3.1.1 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 CoC programme.

I 2.3.1.2 Records of the internal audits demonstrating that each participating site meets the eligibility criteria, the requirements of the applicable Chain of Custody Core model(s), and any additional requirements of the system.

I 2.3.1.3 Records of the annual Chain of Custody management system reports and management reviews.

I 2.3.1.4 The date of withdrawal of any participating site from the Multi-site CoC, and an explanation why the participating site was removed.

I 2.3.1.5 Aggregated volume summaries for all participating sites.

I 3 Risk assessment

I 3.1 Prior to an audit, the organization shall undertake a risk assessment including all sites proposed to be included within the Multi-site CoC, identifying the risk of non-conformances and unmanaged mixing or substitution of RTRS volumes, as a minimum.

I 3.2 The organization shall provide the nominated Certification Body with an up-to-date risk assessment before the initial audit and each subsequent surveillance audit.

I 3.3 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.

I 4 Participation in a Multi-site Chain of Custody

- I 4.1 The organization shall document and implement a procedure with clear rules regarding eligibility for participation.
- I 4.2 All participating sites shall have a legal and/or contractual relationship with the organization requiring regular reporting and communication.
- I 4.3 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 organization.

I 5 Internal audits

- I 5.1 Prior to an audit, the organization shall carry out an initial internal audit of each site to be included prior to being admitted as a participating site within the scope of the multi-site certificate.
- I 5.2 Where non-conformances are found and judged to be major, sites shall be excluded from the scope of the multi-site certificate until the corresponding non-conformances is deemed by the central administrator of the ICS to have been satisfactorily addressed.
- I 5.3 The organization shall prepare an internal annual Chain of Custody management system report on the results of all internal audits as well as on any upcoming changes to the Chain of Custody management system.
- I 5.4 The annual Chain of Custody management system report shall be discussed, reviewed, and approved by top management representatives of the organization and the participating sites.
- I 5.5 A new site shall only be added to the scope of an existing Multi-site CoC certificate if:
 - 1. during an initial internal audit, the site has been found to comply with the requirements of the applicable Chain of Custody Models and with any additional requirements for participation; and
 - 2. the site has been included in the risk-assessment which is submitted annually to the Certification Body; and
 - 3. the site has been part of the scope of audit of the last Certification Body assessment.

Optional Model II - non-GMO Chain of Custody

Applicability

The requirements of this model apply to any organization taking legal ownership of RTRS-certified material and making claims about the material outputs supplied to customers being non-GMO RTRS certified material. The requirements listed below for this optional model II are to be complied in addition to the Type of organization and Core Model A Mass Balance or Model B Segregation Chain of Custody requirements.

II 1 Scope of the non-GMO Chain of Custody Management System

- II 1.1 The organization shall ensure that the non-GMO RTRS-certified material supplied to customers has been physically segregated at the physical site from GMO products or products of unknown status and is not mixed with GMO products or products of unknown status at any other stage under their control (for example during storage, processing, and transport). This applies to supply chains certified under either Model A Mass Balance or Model B Segregation.
- II 1.2 When the non-GMO model is used in conjunction with the group and multi-site certification standard, the group manager and all the group members shall comply with the requirements of this model.

II 2 Testing non-GMO Status

II 2.1 Requirements for the supply chain

- II 2.2.1 The organization shall conduct a semi-quantitative real time polymerase chain reaction (PCR) test, or a similar test that meets the 0.1% detection efficiency, to validate the GMO identity of soy or corn materials they receive. Any laboratory conducting semi-quantitative tests for the presence of GMO DNA on their behalf shall be competent to do so. Laboratories undertaking PCR tests shall be accredited for PCR testing by a recognized Accreditation Body.
- II 2.2.2 Sampling shall consider not less than 15% of the total production and not less than one sample for every 800 tons. To conduct the sampling, the organization shall estimate at least 15% of the total production and extract a sample every 800 tons. Example: An organization receives 10,000 tons → Sample size: 1,500 tons (15%). Two samples shall be taken a) from 0 to 800 tons b) from 801 to 1,500 tons.

- II 2.2.3 A formal risk assessment shall be undertaken of the GMO presence at the required level of origin of every input and potential cross-contamination during subsequent handling, transport, storage, and processing, if applicable.
- II 2.2.4 The organization shall ensure that the accidental presence of GMO DNA in any input materials supplied to them is <0.9% per mass (or lower levels if specified by clients or legislation).
Note: GMO 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 unauthorized GMO DNA in the receiving country.
- II 2.2.5 Where DNA is absent or where the DNA is so disrupted as to be undetectable, organizations shall demonstrate that the materials have been derived from products or processes of non-GMO status by demonstrating
- II 3 Handling of material**
- II 3.1 Critical control points**
- II 3.1.1 Where the organization is simultaneously handling non-GMO and GMO products or products of unknown status, it shall ensure that inputs into the non-GMO RTRS meet the non-GMO RTRS requirements.
- II 3.1.2 The organization shall ensure the supporting documentation and test results confirm the non-GMO status of the material before it is mixed with other non-GMO material on site.
- II 3.2 Material accounting system for RTRS data**
- II 3.2.1 non-GMO data shall not be allocated to GMO products or products of unknown status. If this occurs, the material shall lose its non-GMO status.
- II 3.2.2 Where a Segregated Chain of Custody Core Model 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-GMO status. The requirements of Optional Model I - Multi-site Chain of Custody shall also apply.
- II 3.2.3 Where a Mass Balance Chain of Custody Core Model is in place for RTRS data, the sustainability characteristics (including the RTRS certified status) can be allocated to other non-GMO material, even if the other non-GMO material did not originate from an RTRS certified farm. This is only permitted if the other non-GMO material meets the requirements that RTRS set to decide non-GMO identity. The requirements of Model A Mass Balance Chain of Custody Standard shall also apply.
Note: non-GMO data cannot be allocated to GMO products or products of unknown status in an RTRS Mass Balance Core Model.

Optional Model III – Country Material Balance Chain of Custody

Applicability

The requirements in this model apply to any organization taking legal ownership of RTRS certified material in more than one physical site located in the same country, and making claims about the material outputs supplied to customers being RTRS-certified material through a Country Material Balance. The requirements listed below for this optional model III are to be complied in addition to the Type of organization and Core Model A Mass Balance Chain of Custody requirements.

III 1 Scope of the Country Material Balance Chain of Custody Management System

- III 1.1 The organization shall comply with Chain of Custody Type of organization requirements, Core Model requirements, and the requirements in this model at the level of a physical site and single country as relevant.
- III 1.2 All production sites taking part in a Country Material Balance (CMB) scheme shall be owned, operated, and managed by one organization in the same country.
- III 1.3 The organization shall ensure that the output volume of RTRS CMB claimed material supplied to customers from the physical site in one part of the country does not exceed the input volume of RTRS certified material received at the physical site in another part of the country. The volumes claimed shall be correctly linked to the volumes sold as RTRS CMB.

III 2 Handling of RTRS certified material

III 2.1 Critical control points

- III 2.1.1 Where the organization is simultaneously implementing more than one of the RTRS Chain of Custody Core Model it shall ensure that inputs into the RTRS CMB are considering the correct model of RTRS certified material sourced.

III 2.2 Material accounting system for RTRS data

Inputs

- III 2.2.1 RTRS data for each physical site participating in the CMB shall be recorded in the material accounting system by the organization after they have gained legal ownership of the input material and have checked the supporting documentation.
- III 2.2.2 The organization shall record the quantity (volume or weight) of RTRS inputs received in all physical sites participating in the CMB. This data shall be recorded as output units

using either the conversion factor(s) for the processing unit or actual measured output quantities.

- III 2.2.3 When the processing or manufacturing process generates co-products, the organization shall record the quantity (volume or weight) of RTRS-certified material inputs received at all physical sites participating in the CMB using separate categories for co-products.
- III 2.2.3 When sustainability data is associated with the RTRS-certified material received in all physical sites participating in the CMB, this data shall be recorded in the material accounting system distinguishing the separate categories of sustainability data attributed to the RTRS-certified material.

Outputs

- III 2.2.4 When the processing or manufacturing process generates co-products, the organization shall deduct the quantity of RTRS-certified material supplied to customers by all production sites participating in the CMB 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.
- III 2.2.5 When additional sustainability data is associated with the RTRS material supplied to customers by all production sites participating in the CMB, the organization shall deduct the corresponding quantity of RTRS volume supplied from the one single accounting system, even when the volumes were sold with the associated sustainability data but not sold as RTRS-certified material.
- III 2.2.6 The organization shall ensure that the output of RTRS material supplied to customers by all production sites participating in the CMB does not exceed the input of RTRS material received by all production sites participating in the CMB, using a continuous balancing system.
- III 2.2.7 The organization shall not supply RTRS data to customers for non-soy/corn, non-soy/corn derivatives or non-soy/corn products. In bulked products, the RTRS data shall only be applied to the proportion of soy/corn, soy/corn derivatives or soy/corn products.

III 2.3 Allocation of RTRS data

- III 2.3.1 The organization shall implement the correct balancing of input and output of RTRS data for all production sites participating in the CMB as part of the one single accounting system, using the continuous balancing system.
- III 2.3.2 The organization shall keep the records of RTRS data available to allocate outputs, shall make them clearly visible to relevant staff, and keep them updated at all times.

Optional Model IV – Alignment with EUDR Chain of Custody

Applicability

The requirements in this model apply to any RTRS-certified organization intending to place soy or soy co-products on the European Union market and that the material outputs supplied to customers are EUDR aligned. The requirements listed below for this optional model IV are to be complied in addition to the Type of organization and Core Model A Mass Balance or Model B Segregation Chain of Custody requirements.

Disclaimer: The aim of RTRS is to align its requirements as much as possible with the EUDR due diligence requirements, to provide guidance to RTRS stakeholders with regards to the implementation of the EUDR regulation. Compliance with RTRS certification requirements does not guarantee compliance with the EUDR regulation. The competent authorities retain the final decisions on conformity with the EUDR requirements.

IV 1 Scope of the Alignment with EUDR Chain of Custody Management System

- IV 1.1 The organization shall ensure that the EUDR material supplied to customers has been physically segregated at the physical site from non-EUDR aligned products or products of unknown origin and is not mixed with non-EUDR aligned products or products of unknown origin at any other stage under their control (for example during storage, processing, and transport). This applies to supply chains certified under either Model A Mass Balance or Model B Segregation.
- IV 1.1.1 If the organization is applying RTRS Core Model B Segregation Chain of Custody: to be EUDR aligned, the organization shall:
- a) implement a segregation model for EUDR RTRS-volumes and non-EUDR RTRS volumes
 - b) implement the additional requirements listed in IV 2, IV 3 and IV 4, for the **EUDR-RTRS-Segregated volumes**
- IV 1.1.2 If the organization is applying RTRS Core Model A Mass Balance Chain of Custody: to be EUDR aligned, the organization shall:
- a) have a system in place to assess that all soy or soy co-products on its EUDR supply chain are aligned with EUDR requirements (EUDR RTRS-volumes and EUDR non-RTRS-volumes). This includes at a minimum having documented procedures and records demonstrating how the EUDR material is physically separated to prevent intermixing between materials compliant with the EUDR

requirements (RTRS aligned requirements under IV 2 to IV 4) and those not compliant with the EUDR, throughout the entire supply chain.

- b) implement the additional requirements listed in IV 2, IV 3 and IV 4, for the EUDR RTRS volumes and the EUDR non-RTRS volumes, this is **EUDR-RTRS-mix**.

IV 2.0 Due diligence system (DDS)

This section aligns with [Art. 4 and 8 EUDR regulation](#)

- IV 2.0.1 The organization shall have a due diligence system in place that covers the three subsections below: IV 2.1 Information requirements, IV 2.2 Risk assessment and IV 2.3 Risk mitigation.
- IV 2.2 After exercising due diligence to ensure that any soy or soy product placed on the market is no or only a negligible risk, the organization shall upload on the European Union (EU) database and make available to competent authorities a due diligence statement. The information to be provided for each due diligence statement is listed in Annex C.
- IV 2.3 The selling organization shall communicate to the buying organization down the supply chain of the relevant soy product all information necessary to demonstrate that due diligence was exercised and that no or only a negligible risk was found, including the reference numbers of the due diligence statements associated with those products.
- IV 2.4 The organization that falls under the SME definition (see Glossary) shall not be required to exercise due diligence for the relevant soy products that have already been subject to due diligence and for which a due diligence statement has already been submitted. In such cases, the SME operator shall provide the competent authorities with the reference number of the relevant due diligence statement upon request.
- IV 2.5 The organization that does not fall under the SME definition ('non-SME organizations, including traders that are not SME) may make reference to due diligence statements that have already been submitted only after having ascertained that the due diligence relating to the relevant soy products was exercised. They shall submit their own due diligence statement and shall include the reference numbers of due diligence statements that have already been submitted.
- IV 2.6 Any organization referring to a due diligence statement that has already been submitted shall retain responsibility for conformity of the product(s), including that no or only a negligible risk was found.

IV 2.1 Information requirements

This section aligns with [Art. 9 EUDR regulation](#).

IV 2.1.1 The organization shall collect information, documents and data which demonstrate that all soy and soy co-products supplied are deforestation-free, forest degradation-free and have been produced in accordance with the relevant legislation of the country of production and are covered by a due diligence statement.

RTRS certified organizations may include their RTRS system (RTRS general requirements for collecting and organizing all necessary information) to ensure conformity with the EUDR information requirements.

IV 2.1.2

To demonstrate conformity with the EUDR requirements the organization shall collect the following information, supported by evidence, relating to each soy or soy co-product to be placed on the EU market:

- a) a description, including the trade name of the relevant soy products, the product description shall include the list of relevant soy products contained or used to make those products [please see RTRS Chain of Custody standard version 3.0, section 1.6];
- b) the quantity of the relevant products; for relevant products entering or leaving the market, the quantity is to be expressed in kilograms of net mass [please see RTRS Chain of Custody standard version 3.0, requirement 1.1.5 & 1.5];
- c) the country of production and, where relevant the region where soy has been produced (hereby country of production) [please see RTRS Chain of Custody standard version 3.0, section 1.4 & 1.7];
- d) the geolocation of all plots of land where the soy that the relevant soy product contains, or has been made using, was produced, as well as the date or time range of production; any deforestation or forest degradation (after 31 December 2020) on the given plots of land shall automatically disqualify all soy and relevant soy products from those plots of land from being placed or made available on the market or exported;
- e) the contacts (name, postal address and email address) of organizations the relevant soy or soy product has been supplied from and supplied to [please see RTRS Chain of Custody standard version 3.0, section 1.4];
- f) adequately conclusive and verifiable information that the relevant products are deforestation-free and that soy have been produced in accordance with the relevant legislation of the country of production, including (to support demonstration of conformity with these requirements, the organization can make reference to independently certified compliance with the RTRS Standard for Responsible Soy Production Version 4.0, criteria 4.4):
 - i) any arrangement conferring the right to use the respective area for the purposes of the production of soy [please see RTRS Standard for Responsible Soy Production Version 4.0, section 1.2];
 - ii) environmental protection, as well as forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting [please see RTRS Standard for Responsible Soy Production Version 4.0, principle 4 & criteria 5.2];

- iii) indigenous peoples and local community rights, and the principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples [please see RTRS Standard for Responsible Soy Production Version 4.0, principle 3];
- iv) labour rights and human rights protected under international law [please see RTRS Standard for Responsible Soy Production Version 4.0, principle 2];
- v) tax, anti-corruption, trade and customs regulation [please see RTRS Standard for Responsible Soy Production Version 4.0, requirement 1.1.3 for anti-corruption]

IV 2.2 Risk assessment

This section aligns with [Art. 10 EUDR regulation](#).

- IV 2.2.1 The organization shall assess the complexity of the supply chain in terms of amount, location and size of suppliers, type of organization and outsourced- activities
- IV 2.2.2 The organization shall conduct a risk assessment to determine the risk of:
 - a) sourcing soy or relevant soy co-product produced in a no-eligible area where
 - i) deforestation or forest degradation happened or is happening after 31 December 2020 (deforestation-free) [please see RTRS Standard for Responsible Soy Production Version 4.0, criteria 4.4]
 - ii) regulatory non-compliance exists based on the information collected as per IV 1.1 [please see RTRS Standard for Responsible Soy Production Version 4.0, principle 1]
 - b) evading EUDR Regulation;
 - c) mixing origins meaning mixing with products of unknown origin or origin in high-risk or standard-risk countries. [please see RTRS Chain of Custody Standard Version 3.0, section IV 1]
- IV 2.2.2.1 The risks shall be classified in negligible (low risk) and non-negligible (high-risk).
- IV 2.2.3 The risk assessment shall consider:
 - a) the assignment of risk to the relevant country of production, also considering any concerns, such as level of corruption, prevalence of document and data falsification, lack of law enforcement, violations of international human rights, armed conflict or presence of sanctions imposed by the UN Security Council or the Council of the European Union [please see RTRS Standard for Responsible Soy Production Version 4.0, principle 1];
 - b) the presence of forests in the country and prevalence of deforestation or forest degradation in the country [out of RTRS scope];
 - c) the presence of indigenous peoples in the country, the consultation and cooperation in good faith with them, and the existence of duly reasoned claims by them based on objective and verifiable information regarding the use or

ownership of the area used for the purpose of producing soy [please see RTRS Standard for Responsible Soy Production Version 4.0, principle 3];

- d) the source, reliability, validity, and links to other available documentation of the information referred to in IV 2.1. *The organization can build on its RTRS General Requirements (please see RTRS Chain of Custody standard version 3.0, section 1.1) to demonstrate conformity with this requirement;*
- e) the complexity of the relevant supply chain and the stage of processing of the relevant soy products, in particular difficulties in connecting relevant soy products to the plot of land where soy were produced. *The organization can build on its RTRS General Procedure (please see RTRS Chain of Custody standard version 3.0, section 1.1) to demonstrate conformity with this requirement;*
- f) the risk of circumvention of the EUDR Regulation or of mixing with relevant soy products of unknown origin or produced in areas where deforestation or forest degradation has occurred or is occurring;
- g) substantiated concerns submitted by any person to competent authorities when they consider that one or more operators or traders are not complying with the EUDR Regulation, information on the history of non-compliance of operators or traders along the relevant soy supply chain or any information that would point to a risk that the relevant products are non-compliant with the EUDR Regulation [out of RTRS scope];
- h) conclusions of the meetings of the Commission expert groups supporting the implementation of the EUDR Regulation, as published in the [Commission's expert group register](#);
- i) complementary information on compliance with the EUDR Regulation, which may include information supplied by certification or other third-party verified schemes, including voluntary schemes.

IV 2.2.4 If the risk assessment results in no risks or negligible risks, the organization shall, before placing soy products on the market or export them, proceed with a simplified due diligence (section IV 3). If the risk assessment results in non-negligible risks, risk assessment and risk mitigation (sub-section IV 2.3) shall be implemented.

IV 2.2.5 The organization shall document and review the risk assessments at least annually. If new risks (negligible or non-negligible arise), the organization shall take them into account immediately.

IV 2.2.6 The organization shall be able to demonstrate how the information gathered in IV 2.1 was checked against the risk assessment criteria set out in IV 2.2.1.1 and how the degree of risk was determined.

IV 2.3 Risk mitigation

This section aligns with [Art. 11 EUDR regulation](#).

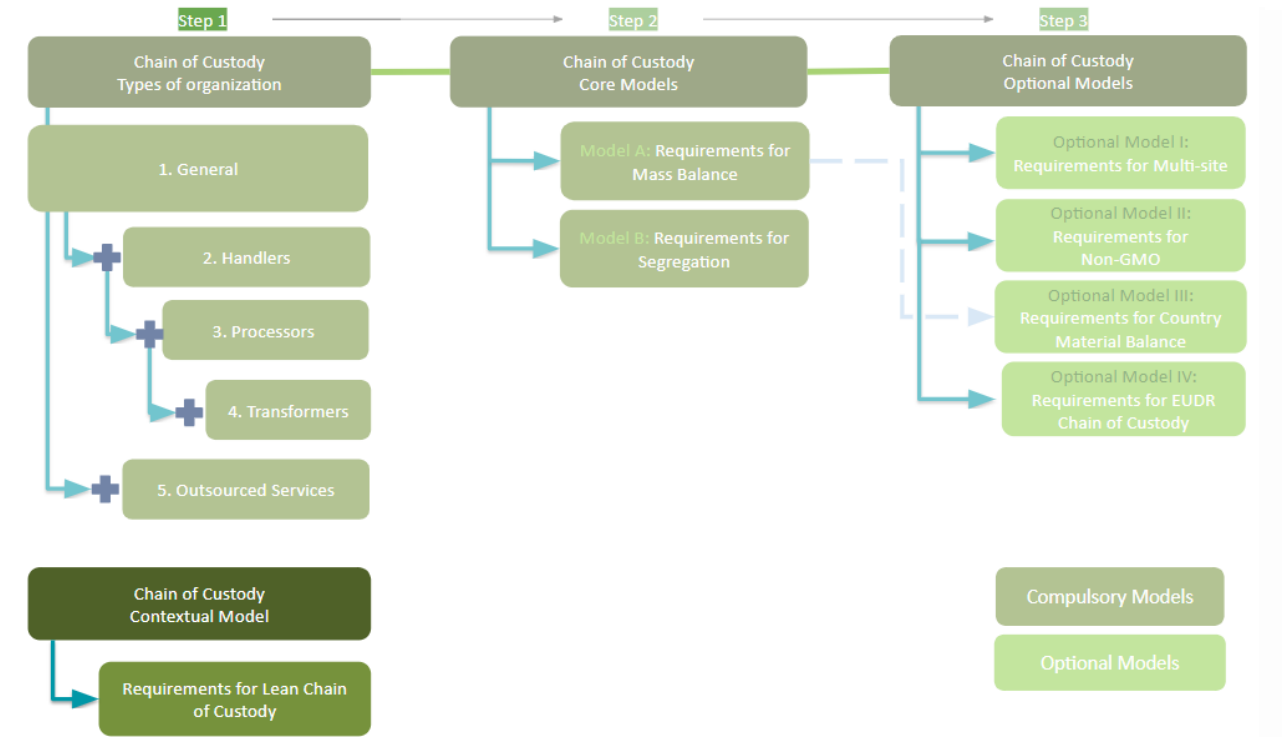
Risk mitigation can be demonstrated through the appropriate resolution of any non-conformity identified during an RTRS independent verification audit as long as all Model IV requirements have been audited.

- IV 2.3.1 The organization shall develop a risk mitigation plan when non-negligible risks result from the risk assessment as per IV 2.2.1. The objective of the mitigation plan is to achieve no risk or only a negligible risk.
- IV 2.3.1.1 The mitigation plan may include the request for additional information or evidence from the soy producing organization, the conduct of independent surveys or audits at the soy producing organization or the supply chain or any other measures to obtain the needed information or evidence to reduce the non-negligible risks. *RTRS certification audits against RTRS Standard for Soy Production version 4.0 may be used to support the implementation of an appropriate mitigation plan.*
- IV 2.3.2 The organization shall have in place policies and procedures to mitigate and manage effectively the risks of non-compliance of relevant soy products identified, including model risk management practices, reporting, record-keeping, internal control and compliance management, including the appointment of a compliance officer at management level for non-SME operators *The organization can build on its RTRS General Procedure [please see RTRS Chain of Custody standard version 3.0, section 1.1] to demonstrate conformity with this requirement;*
- IV 2.3.3 The organization shall place soy products on the market or export them only after implementing the risk mitigation plan.
- IV 2.3.4 The organization shall document and review the decisions on risk mitigation procedures and measures at least annually. If as a result of the risk assessment update in IV 2.2.3 new non-negligible risks appear, the organization shall take them into account in the risk mitigation plan.
- IV 2.3.5 The organization shall be able to demonstrate how decisions on risk mitigation procedures and measures were taken.
- IV 3** **Simplified due diligence**
This section aligns with [Art. 13 EUDR regulation](#).
- IV 3.2 When the risk assessment results in no risks or negligible risks, the organization shall, before placing soy products on the market or export them, be able to demonstrate how the risk assessment has been done, how risks of sourcing from non-eligible areas, evading EUDR regulation and mixing origins have been assessed.
- IV 4** **Records**
This section aligns with [Art. 12 EUDR regulation](#). The organization can build on its RTRS procedure for record keeping [please see RTRS Chain of Custody standard version 3.0 requirements 1.1.4 & 1.1.5] to demonstrate conformity with this requirement
- IV 4.1 The organization shall establish and keep up to date a framework of procedures and measures to ensure that the relevant products they place on the market or export comply with IV 2 Due diligence system.

- IV 4.2 The organization shall have a procedure for identifying non-compliances related to requirements on IV 2, IV 3 and IV4 and have records available to demonstrate conformance and non-conformance. This procedure can be an internal control system for identifying non-conformities with the requirements under IV 2, IV 3 and IV4. If a non conformance is identified, a corrective plan and corrective action is implemented and recorded.
- IV 4.3 The organization shall maintain for at least 5 years, from the date of placing soy products on the market or for the export, up-to-date records and documents to demonstrate compliance with the regulation. The organization shall store all documentation related to due diligence, such as all information, documents and data from suppliers, records, risk assessments, risk mitigation plants, measures and procedures pursuant IV 2.1, IV 2.2 and IV 2.3.
- IV 4.4 The organization shall make the information, documents and data collected under IV 2.1, the risk assessment under IV 2.2 and the risk mitigation under IV 2.3 available to the supply chain buyers certification body and competent authorities upon request.
- IV 4.5 The organization shall annually publish a report, on their website, on their due diligence systems including how IV 2.1, IV 2.2 and IV 2.3 were conducted and at the minimum:
- IV 4.5.1 IV 2.1.1 “a”, “b” and “c”
- IV 4.5.2 the conclusions of the risk assessment carried out pursuant to IV 2.2 and measures undertaken pursuant to IV 2.3 and a description of the information and evidence obtained and used to assess the risk;
- IV 4.5.3 where applicable, a description of the process of consultation of indigenous peoples, local communities and other customary tenure rights holders or of the civil society organisations that are present in the area of production of the relevant commodities and relevant products under IV 2.2.1.1 “c”, “d” and “e”

Contextual Model

The following section of the standard includes the RTRS Chain of Custody Contextual Model Requirements.



Lean Chain of Custody

Applicability

The requirements of this model shall apply to any organization taking legal ownership of products where RTRS soy has been embedded, who wishes to make claims about the embedded material contained in their products being RTRS Chain of Custody certified through a Lean Chain of Custody.

1 Scope of the Chain of Custody Management System

1.1 The organization shall ensure that the output volume of RTRS embedded claimed material supplied to customers does not exceed the input volume of RTRS embedded certified material received, using a continuous accounting system.

2 Handling of RTRS certified material

2.1 Purchase & sale invoices' records

2.1.1 The organization shall keep record and present official transaction documents, such as sales and purchase invoices, purchase orders and delivery notes (physical or electronic)

issued for products sold with RTRS claims and ensure they include the following information:

- Identification of the organization (e.g., name, address, other relevant information).
- Identification of the customer (e.g., name, address, other relevant information)
- Date when the document was issued
- Description of the products in transaction
- Quantity of the products sold
- The organization's RTRS Chain of Custody certificate number.

2.2 Annual volume summaries and conversion factors

2.2. The organization shall prepare and present reports of annual volume summaries (in the measurement unit commonly used by the organization), covering the period since the previous reporting period.

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The volume summary shall include:

- inputs received
- inputs used for production and losses (if applicable)
- conversion factors *
- inputs still in stock
- outputs still in stock
- outputs supplied.

*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.

The RTRS Soy and Corn Footprint Calculator shall be used as a reference to compare the conversion factors reported and validate that it does not differ more than 5% from the tool's calculation.

3. Use of the RTRS Online Platform

Each supply chain organization using embedded soy/corn who wishes to apply the RTRS Chain of Custody Contextual Model - Lean Chain of Custody shall have an account in the RTRS Online Platform to register the transactions.

3.2 The acquiring and offering organization shall register all transactions of products containing embedded RTRS-certified material into the RTRS Online Platform once the volume is agreed by both parties. The offering organization shall confirm that the acquiring organization is certified under the RTRS Chain of Custody Standard as well in order to properly register the volumes' transfer.

Note: RTRS Credits² and physical products are separate and mutually exclusive flows. An organization that buys physical volumes of RTRS-certified material cannot attempt to generate RTRS credits in the RTRS Online Platform.

3.3 The organization acquiring products containing embedded RTRS-certified material shall check the physical shipment, sales and delivery documentation received matches the data within the RTRS Online Platform for their specific transaction prior to approving the transaction. Only once they have approved it, they are able to offer/sell the material to the next organization in the chain.

4. Use of RTRS Logo and Claims

4.1 The organization shall apply the RTRS claim or/and logo on RTRS-certified material following the requirements specified in the RTRS Use of the Logo and Claims Policy V5. The type of RTRS claim or/and logo shall always correspond to the RTRS claim or/and logo used on sales documents, as specified in this Standard and in RTRS Use of the Logo & Claims Policy V5.

4.2 The organization shall present a list of all documents, channels etc. where any RTRS claim and/or logo is included, and present the evidence needed to prove correct use of claim or/and logo in compliance with the RTRS Use of the Logo and Claims Policy V5.

4.3 All new artwork and logos shall be shared for approval with the Certification Body prior to its usage and shall comply with RTRS Use of the Logo & Claims Policy V5.

² Once certified against the RTRS Standard for Responsible Soy Production, the producer is granted credits equivalent to the volume of certified soy production (1 ton of RTRS-certified soy is equivalent to 1 credit). The same applies for the new RTRS Standard for Responsible Corn Production, the producer is granted credits equivalent to the volume of certified corn production (1 ton of RTRS-certified corn is equivalent to 1 credit). Organizations willing to support responsible soy and corn production and supply and/or to balance the impact of soy and corn used in their products can acquire RTRS Credits.

Annex

Annex A. RTRS Soy & Corn Conversion Factors & Footprint Calculator (informative)

All organizations in the RTRS Chain of Custody Supply Chain are required to include conversion factor's calculations as part of the organization's annual volume summaries within material balance records.

The [RTRS Soy & Corn Conversion Factors & Footprint Calculator](#) is a transparent online tool that enables players in the soy and corn sector, organizations, and consumers in general to calculate the amount of soy or corn used to produce different kinds of soy or corn industrial coby-products, feed compound products and food products.

It was developed, at different stages, by the CEAg - Agribusiness and Food Center of the Austral University (Argentina) and 3Keel (United Kingdom), professional and reliable advisors in the matter. Working in partnership with these entities along with the references, experts, the crushing industry and the intermediate institutions, it gave the technical and theoretical frame required to develop a rigorous and representative soy footprint calculation system.

The RTRS Soy & Corn Conversion Factors & Footprint Calculator offers two alternative models, namely (i) an economic allocation, and (ii) a demand allocation.

- **Demand Allocation** applies for processors;
- **Economic Allocation** for the rest of the supply chain actors

The RTRS Soy and Corn Conversion Factors & Footprint Calculator shall be used as a reference to compare the conversion factors reported and validate by supply chain actors and shall not differ more than 5% from the RTRS Soy and Corn Conversion Factors & Footprint Calculator outputs.

For guidance on how to use this tool please refer to the information available in the RTRS Soy & Corn Conversion Factors & Footprint Calculator [website](#).

Annex B. RTRS Online Platform (informative)

The RTRS Online Platform is an online global tool provided by RTRS that connects stakeholders across the soy and corn value chain that aims to keep records of RTRS certifications (production and Chain of Custody, issued by Certification Bodies, accredited by national or international Accreditation Bodies), certified produced volumes and hectares,, and transactions run by RTRS certified material adopters (members and non-members) of certified material adoption (RTRS Credits and Physical flows).

As a centralized registry platform, this tool is designed to enhance transparency and efficiency throughout the global soy and corn value chains involving RTRS certification and RTRS certified material, as well as trademarks, logos & claims.

Important note:

Each transaction involving uptake and/or transfer of RTRS Credits (after implementation of RTRS Certification for Responsible Soy Production at production level) and/or leading to the physical transfer of soy or soy co-products from one economic operator to the next (in this case, each step of the supply chain, starting at the production level, has Chain of Custody certification) shall have a platform user account on the Online Platform, and the registries of the certified material shall occurred until it reaches the final end user.

In terms of claiming of RTRS attribute (certification or certified material) and use of logo, any agreement and transactions between soy stakeholder actors, shall be registered in the Online Platform; if not registered in the Online Platform has any validity.

For guidance on how to use this tool please refer to the Manual on How to Use the RTRS Online Platform.

Annex C. Due diligence statement

Information to be contained in the due diligence statement in accordance with Article 4(2) as per Annex II of EUDR Regulation:

1. Operator's name, address and, in the event of relevant commodities and relevant products entering or leaving the market, the Economic Operators Registration and Identification (EORI) number in accordance with Article 9 of Regulation (EU) No 952/2013.
2. Harmonized System code, free-text description, including the trade name as well as, where applicable, the full scientific name, and quantity of the relevant product that the operator intends to place on the market or export. For relevant products entering or leaving the market, the quantity is to be expressed in kilograms of net mass and, where applicable, in the supplementary unit set out in Annex I to Regulation (EEC) No 2658/87 against the indicated Harmonized System code or, in all other cases, expressed in net mass specifying a percentage estimate or deviation or, where applicable, volume or number of items. A supplementary unit is applicable where it is defined consistently for all possible subheadings under the Harmonized System code referred to in the due diligence statement.
3. Country of production and the geolocation of all plots of land where the relevant commodities were produced. Where the relevant product contains or has been made using commodities produced in different plots of land, the geolocation of all plots of land shall be included in accordance with Article 9(1), point (d).
4. For operators referring to an existing due diligence statement pursuant to Article 4(8) and (9), the reference number of such due diligence statement.
5. The text: 'By submitting this due diligence statement the operator confirms that due diligence in accordance with Regulation (EU) 2023/1115 was carried out and that no or only a negligible risk was found that the relevant products do not comply with Article 3, point (a) or (b), of that Regulation.'
6. Signature in the following format:
'Signed for and on behalf of:
Date:
Name and function: Signature:'.



ROUND TABLE
ON RESPONSIBLE SOY

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