

Benchmark of Genesis Quality Assurance (QA)

June 2008

Summary

In order to determine whether Genesis Quality Assurance (QA) meets the requirements of the RTFO "Qualifying Standard" a benchmark was performed. The benchmark assessed whether Genesis QA complies with the demands for the RTFO Qualifying Standard.

Two aspects are of importance to determine the quality of a certification scheme and whether it meets the requirements:

- *The criteria and indicators of the sustainability standard;*
- *The auditing quality of the sustainability standard.*

The benchmark makes us believe that Genesis QA meets the full RTFO Meta-Standard level for environmental aspects. Genesis QA covers all of the minimum requirement environmental criteria of the RTFO Meta-Standard. The standard covers some of the social criteria, but does not meet the Social Qualifying Standard level.

The audit quality benchmark leads us to believe that there are enough safeguards to trust that the Genesis QA system ensures that certified farms comply with the standard. The main reasons for this are:

- *Genesis QA uses a certification body that is accredited by UKAS to EN45011 (ISO/IEC 65).*
- *All farms are assessed fully each year.*
- *Auditors are required to have a minimum level of experience and education. Besides this they need to complete a specific course and are checked by an annual shadow assessment.*

Background Genesis QA

Since the beginning of 2008 the UK reporting scheme of the RTFO has been operational. The reporting scheme aims to make maximum use of existing voluntary agri-environmental and social accountability schemes. It encourages transport fuel suppliers to demonstrate that their biofuel feedstock is produced in accordance with the RTFO Sustainable Biofuel Meta-Standard through existing certification schemes.

Several sustainability certification schemes have been benchmarked to determine which schemes meet the demands of a "Qualifying Standard" for social and/or

environmental criteria - representing an acceptable level of sustainability. During stakeholder consultations it was also suggested to benchmark Genesis QA.

Genesis QA is split into a Whole Farm module and a specific module (in this case, Arable and sugar beet). The standard mostly focuses on health and safety issues, fertiliser application and plant protection.

Benchmark results

Genesis QA members have to comply with current legislation and adopt new legislation as it becomes implemented. In general Genesis QA covers all of the minimum requirement environmental criteria of the RTFO Meta-Standard, and covers some of the social criteria.

Criteria and indicators¹

The results of the benchmark of the criteria are presented below. Detailed results can be found in Appendix C.

1. Carbon conservation (Compliant)

If the land is converted after November 2005 and is consequently used for producing energy crops, producers must assess and record carbon losses.

2. Biodiversity conservation (Compliant)

Biodiversity is well covered in Genesis QA. Producers have to comply with for instance the Wild Birds Directive and other regulations and should be aware of any practise that have an environmental impact and identify and conserve features of biodiversity and conservation value. Important features of biodiversity have to be identified and conserved on and around the farm.

3. Soil conservation (Compliant)

Soil conservation is well covered in Genesis QA; it mostly addresses the erosion risks and mitigation measures. In addition, soil analysis is required for major nutrients every 4-5 years and best practises should include knowledge of the classification of the soils on the farm including the conservation and build up of soil organic matter.

4. Sustainable water use (Compliant)

Water conservation is not explicitly mentioned, although the production unit must have copies or access to several publications, including good agricultural practice for the protection of water. Water quality is covered extensively in the standard.

¹ For a description of the methodology, criteria and elements to be benchmarked, cf. Ecofys (2007) Sustainability reporting within the RTFO: Framework report.

5. Air quality (Compliant)

The producer should have access to several publications amongst other, one in which the protection of air is covered. Burning of waste is not allowed in the standard and in general, as stated above, the producer has to comply with national law and legislations.

6. Workers' rights and relationships (Partly compliant)

Only regulations on subcontracting and health and safety are provided, furthermore no social criteria are covered.

7. Land rights and community issues (Not compliant)

The standard does not include any criteria on land right and community issues.

Table 1: Benchmark results

	GenesisQA
P1. Conserve carbon stocks	Y
P2. Conserve biodiversity	Y
P3. Soil conservation	Y
P4. Sustainable water use	Y
P5. Air quality	Y
P6. Labour conditions	P
P7. Land rights and community relation	N

Audit Quality

To determine the quality of Genesis QA's procedures for assessments, certification and accreditation, an audit quality benchmark was performed.

The quality of the audit is equally as important as the depth and scope of a standard. If a standard covers all relevant sustainability criteria but has poor audit procedures, actual compliance with the sustainability criteria remains uncertain.

The audit quality of Genesis QA has been benchmarked to compare the controls around audit quality. The results are shown in the table below.

Accreditation		Certification bodies		Audits and auditors			Stakeholder involvement		Verification
Who is responsible for accreditation?	What is required for certification bodies to be accredited against the standard?	What percentage of audits is carried out by nationally accredited organisations (such as by UKAS)?	How many certification bodies are accredited to use the standard?	Do all farms need to be audited annually?	How are audit programs and audit activities managed?	What is the required competence of auditors?	What is the level of stakeholder consultation?	Are public summaries of the audit available?	How do you retrospectively ensure audits are carried out to the required standard?
UKAS.	EN45011 accreditation required.	All audits are carried out by PAI, which is accredited by UKAS (EN45011 ² and EN45012 ³).	Product Authentication International (PAI) is the only certification body appointed by Genesis QA to carry out assessments and certification to Genesis QA's Standards.	All farms are fully assessed on an annual basis.	Appointments are made for the full on-farm assessment. Assessment consists of examination of the farm, procedures and records.	Auditors are required to have min. 5 years industry experience and agricultural education. Assessors have to complete a course (involves training and examination) and have annual shadow assessments and written examinations.	Stakeholder consultation is not part of the audit process.	Summaries of the audits are not publicly available.	Assessment reports are reviewed and graded for assessor performance by PAI. Annual shadow assessments are carried out for each assessor by PAI as well. Besides this, PAI uses spot checks to verify assessor's work and farmers' continued compliance to the standards. UKAS carries out an annual surveillance (including one or two shadow assessments) as part of its accreditation processes. There is no verification by the standard owner (i.e. Genesis QA).

² EN45011:1998 'General Requirements for bodies operating product certification systems' (ISO/IEC 65:1996)

³ EN45012:1998 'General Requirements for bodies operating assessment and certification/registration of quality systems' (ISO/IEC 62:1996)

Conclusions and recommendations

Sustainability

Genesis QA covers all of the minimum requirement environmental criteria of the RTFO Meta-Standard. The standard covers some of the social criteria, but does not meet the Social Qualifying Standard level.

Audit Quality

Genesis QA uses the services of Product Authentication Inspectorate Limited (Trading as Product Authentication International (PAI)) for the assessments and certification processes. PAI is the only certification body appointed by Genesis QA to do so.

Strong points

The most important points that enhance the audit quality of Genesis QA are the following:

- All audits are carried out by PAI, which is accredited by UKAS to EN45011 (ISO/IEC 65). EN45011 describes general requirements for bodies operating product certification systems. Accreditation to EN45011 provides a justified belief that the Certification Body is capable of operating third-party certification systems in a consistent and reliable manner.
- Auditor requirements are in order. PAI auditors are required to have a minimum of 5 years industry experience and along with a formal agricultural education. Assessors have to complete an Assessor Programme (PACT) which involves initial training and examination. Besides this they have an annual shadow assessments and annual written examinations.
- All farms are fully assessed on an annual basis.

Possible areas for improvement

Some aspects of Genesis QA's audit quality have potential for improvement, most notable points are:

- Stakeholder consultation is absent during audits. Only during standard setting processes (industry) stakeholders are consulted.
- Public summaries of the audits are not available. Genesis QA and the certification body have obliged themselves to respond to queries from third parties enquiring about the status of any certified farm unit in their standard. This information is limited to the name and address of the farm, scope of certification (i.e. arable, beef, dairy), and date of certification and expiry.

- PAI manages the audit programme and activities on behalf of Genesis QA, rather than the standard owner themselves developing and managing their audit programmes and activities.
- Genesis QA does not have written procedures on accreditation requirements. Rather a contract with PAI exists that stipulates standard operating procedures; however the content of this contract is confidential between the two companies and not publicly available.

Summary

The audit quality benchmark leads us to believe that there are enough safeguards to trust that the Genesis QA system ensures that certified farms comply with the standard. The main reasons for this are:

- Genesis QA uses a certification body that is accredited by UKAS to EN45011 (ISO/IEC 65).
- All farms are assessed fully each year.
- Auditors are required to have a minimum level of experience and education. Besides this they need to complete a specific course and are checked by an annual shadow assessment.

Recommendation

We recommend the RFA do accept the system of Genesis Quality Assurance as a standard which meets the RTFO Meta-Standard level on environmental aspects of the RTFO. We believe the *audit quality of Genesis Quality Assurance is sufficient* to ensure that certified farms comply with its standard.

Appendix A The norm for Qualifying Standards

The following norms were used for the benchmarks.

To become a Qualifying Environmental Standard the following criteria requirements must be met:

- Full compliance with all criteria referring to compliance with national legislation (2.1, 3.1, 4.1, 5.1)
- On all principles one 'partial compliance' criterion is permitted per principle, with a maximum of three in total.

Full compliance with a criterion is only awarded if the RTFO criterion is met by a corresponding mandatory criterion in the benchmarked standard.

To become a Qualifying Social Standard the following criteria requirements must be met:

- Of the 11 minimum requirement criteria of principle 6, 7 must be fully complied with
- On principle 7 on land right issues and community relations, one partial compliance is permitted.

Full compliance with a criterion is only awarded if the RTFO criterion is met by a corresponding mandatory criterion in the benchmarked standard.

Appendix B Guidance on compliance with criteria

In the benchmark performed on the criteria and indicators of existing standards against the RTFO Sustainable Biofuel Meta-Standard criteria and indicators three scores have been assigned:

- Y: Yes the RTFO criterion and its indicators are sufficiently met by the benchmarked standard
- X: No the RTFO criterion and its indicators are not or insufficiently met by the benchmarked standard
- P: indicating that the RTFO criterion and its indicators are partially met by the benchmarked standard. There can be three reasons for this:
 - Of the various indicators for one criterion several are met and several are not met
 - The subject covered by a criterion is addressed but in a less stringent manner. For example, several standards state that destruction of primary forest is forbidden but do not give a reference year. As the reference year is considered important this leads to a partial compliance score "P"
 - The RTFO Meta-Standard indicators are fully met by the benchmarked standard but are not mandatory for certification.

All Ps and Xs form gap criteria. In order to be able to claim the full RTFO Sustainable Biofuel Meta-Standard, successful supplementary checks on all gap criteria of the Qualifying Standard are required.

Supplementary checks can also be used to comply with gap criteria between a non-qualifying benchmarked standard and the Qualifying Standard level, or indeed to comply with gap criteria between a non-Qualifying Standard and the full RTFO Sustainable Biofuel Meta-Standard level.

Appendix C Detailed benchmark of criteria

Table 2: Detailed results of benchmark environmental criteria Genesis QA

Principles and Criteria		Genesis QA
P 1. Carbon Conservation		
C 1.1 Preservation of above and below ground carbon stocks (reference date 01-11-2005).	✓	3.12 EIA required and assessment & record keeping of carbon losses
P2. Biodiversity conservation		
C 2.1 Compliance with national laws and regulations relevant to biomass production and the area where biomass production takes place.	✓	General compliance with national legislations and 3.3.7: local legislations
C 2.2 No conversion of high biodiversity areas after 01-11-2005	✓	3.12 EIA required
C 2.3 Identification and conservation of important biodiversity on and around the production unit.	✓	3.3.7. identify and conserve important features of biodiversity (GAEC and SMR)
<i>Recommendations</i>		
2.4 Preservation and/or improvement of surrounding landscape		Note this criterion is substantially changed from when the original benchmark was carried out and is therefore blank.
P3. Soil conservation		
C 3.1 Compliance with national laws and regulations relevant to soil degradation and soil management.	✓	3.3.6. Producer should be aware of erosion risk and mitigation measures & general compliance
C 3.2 Application of best practices to maintain and improve soil quality. o Erosion control o Soil nutrient balance o Soil organic matter o Prevention of salinisation o Soil structure	✓	3.3.6. Mostly focussing at erosion and soil analysis, soil organic matter
<i>Recommendations</i>		
C 3.2a Measurements	✓	3.3.5. Soil analysis every 4-5 years
C 3.3 The use of agricultural by-products does not jeopardize the function of local uses of the by-products, soil organic matter or soil nutrients balance.	X	
P 4. Sustainable Water Use		
C 4.1 Compliance with national laws and regulations relevant to contamination and depletion of water sources.	✓	2.2.1.1 Access to general publications
C 4.2 Application of <i>best practices</i> to reduce water usage and to maintain and improve water quality.	✓	2.5.2; 2.5.3; 2.11.3.1; 2.11.4; 3.2.10; 3.2.11; 3.2.14; 3.2.16
<i>Recommendations</i>		
4.2 b Records	X	
P5. Air quality		
C 5.1 Compliance with national laws and regulations relevant to air emissions and burning practices	✓	2.2.1.1 Access to general publications & general compliance with national legislation
C 5.2 No burning as part off land clearing or waste disposal	✓	2.11.3. most waste may not be burned

Table 3: Detailed results of benchmark social criteria Genesis QA

Principles and Criteria		Genesis QA
P6. Workers rights and working relationships		
C 6.1 Compliance with national laws concerning working conditions and workers rights	✓	General compliance with national legislations
C 6.2 Contracts	X	
C 6.3 Provision of information	X	
C 6.4 Subcontracting	P	2.4.0.
C 6.5 Freedom to associate and bargain	X	
C 6.6 Child labour	X	
C 6.7 Young workers (15-17)	X	
C 6.8 Health and Safety	✓	2.1 comply with legal requirements, and annually review policy, written policy plan
C 6.9 Wages	X	
C 6.10 Discrimination	X	
C 6.11 Forced labour	X	
<i>Recommendations</i>		
C 6.12 Working hours	X	
P 7 Land right issues and community relations		
C 7.1 Land right issues	X	
C 7.2 Consultation and communication local stakeholders	X	