



NEPCon OÜ Evaluation of Drax Power Limited Compliance with the SBP Framework: Public Summary Report

Re-assessment

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Completed in accordance with the CB Public Summary Report Template Version 1.5

For further information on the SBP Framework and to view the full set of documentation see www.sbp-cert.org

Document history

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1 Overview

Certification Body (CB) Name:	NEPCon OÜ
Primary CB contact for SBP:	Ondrej Tarabus
Primary CB contact email:	otarabus@preferredbynature.org
Audit team leader:	Ondrej Tarabus
Audit team members:	Elisa Copco
Name of the Company:	Drax Power Limited
Company legal address:	New Rd, Drax, Selby, YO8 8PH North Yorkshire, United Kingdom
Company contact for SBP:	Michael Goldsworthy
Company contact email:	michael.goldsworthy@drax.com
Company website:	www.drax.com
SBP Certificate Code:	SBP-01-43
Date of certificate issue:	10 Oct 2021
Date of certificate expiry:	09 Oct 2026
Audit closing meeting date:	17 Aug 2021
Audit cycle:	Re-assessment

2 Scope of the evaluation and SBP certificate

Scope Item	Check all that apply to the Certificate Scope	Change in scope (N/A for Assessments)
Primary Activity:	Trader	☐
Approved Standards:	SBP Standard 4: Chain of Custody; SBP Standard 5: Collection and Communication of Data Instruction	☐
Includes Supply Base Evaluation (SBE):	No	☐
Includes communication of Dynamic Batch Sustainability Data (DBSD)	Yes	☐
Includes Group Scheme	No	☐
Products	Pellets	☐

Feedstock types:	N/A	☐
Feedstock origin (countries):	N/A	☐
SBP-endorsed Regional Risk Assessments used: Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/	Not applicable	☐
Chain of custody system implemented:	FSC: NC-COC-026275	☐
	Transfer	☐

2.1 Description of the company

Drax Power Ltd is an energy producer from UK with both the office and the power plant located in the same place at Selby. Drax Power is procuring wood pellets from USA, Canada, Portugal, Baltic countries, Belorussia or Brazil. The organization holds FSC and PEFC certificates with transfer system implemented. The point of purchase varies and can be either FOB or CIF at different ports in the world.

2.2 Detailed description of the Chain of Custody system

The organization has implemented the FSC and PEFC transfer system for biomass (wood pellets only) in the scope of the certificate. The process covers trade with biomass. The material from different suppliers can be mixed on one ship once it's loaded. However, in such cases individual batches with different claims would remain the same on input and output by using mass balance to distinguish between different materials (in order to follow the GHG, profiling and batch specific characteristics of the material). Furthermore, the organization is storing material in Tyne, Liverpool, Hull and Immingham. Material from these storage facilities is not traded, but used for generation only. In all cases material received is always at least EUTR compliant biomass. In case the material would be uncertified it would not be received, and non-conforming product procedure would be followed. Each purchased material is recorded in the internal system. These records include the certification status of the material and the sales documents always contain the same type and quantity of material as purchased. The FSC is mentioned on the sales invoices and SBP claim in the DTS. The sustainability characteristics for each batch are mentioned in an annex to the invoice which always contains the number of the invoice as well.

3 Specific objective

The specific objective of this evaluation was to confirm that the Biomass Trader's management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification.

The scope of the evaluation covered:

- Review of the Biomass Trader's management procedures;
- Review of FSC and PEFC system control points, analysis of the existing FSC and PEFC CoC system;
- Interviews with responsible staff;
- Review of the records and calculations
- GHG data collection analysis;

4 Evaluation process

4.1 Timing of evaluation activities

<i>Audit Level of Effort (LoE)</i>		
Activity	Auditors	Auditor hours
1. Preparation	Ondrej Tarabus	5,0
2. On-site (excl. travel time)	Ondrej Tarabus	6,0
3. Report writing	Ondrej Tarabus	5,0
4. Other	N/A	N/A

<i>Audit Schedule</i>			
Activity	Location	Auditor name	Date/time
<i>Opening meeting</i>	remote	OT	17 Aug 2021/09:00
<i>Evaluation of management system</i>	remote	OT	17 Aug 2021/09:30
<i>Purchasing, DTS data</i>	remote	OT	17 Aug 2021/10:45
<i>Sales</i>	remote	OT	17 Aug 2021/12:30

<i>Energy data</i>	remote	OT	17 Aug 2021/13:00
<i>Closing meeting</i>	remote	OT	17 Aug 2021/15:00

Auditor qualification		
Auditor name	Role	Qualification
Ondrej Tarabus	lead auditor	Czech citizen, graduated in University of Life Sciences Prague, The Faculty of Forestry. He has participated in several FSC FM, FSC CoC, PEFC CoC, ISCC certification assessments in Czech Republic, Slovakia, Italy, Germany, Vietnam, Egypt, Spain, Romania, Bosnia and Herzegovina, Austria, etc. Ondřej Tarabus has been through lead assessor SBP training course and is experienced with carbon calculation using standards such as ISO 14 064, Carbon Footprint management or ISCC.
Elisa Copco	Auditor in training	Elisa has worked as Certification Services Co-ordinator for NEPCon in the UK, Ireland and Italy since May 2011. Elisa holds an MSc in Business Strategy and the Environment and a Degree in Natural Science, and she has a professional background of several years in the landscape and construction industries. Elisa has been trained as a Lead Auditor for Chain of Custody and has years of experience auditing companies in UK, Ireland and Italy; since 2015, she is NEPCon UK Regional Manager.

4.2 Description of evaluation activities

The audit was conducted remotely as Drax workers are not yet back in the office and the travel restrictions does not allow the auditor to visit the organization personally. This approach is in line with COVID-19 instruction but might be done remotely even without this instruction as the scope is trader without physical possession. The audit started with an opening meeting attended by Michael Goldsworthy.

Lead auditor introduced the audit team (second auditor was participating as a trainee), provided information about audit plan, methodology and aim of the audit. CB's approval related issues and confidentiality issues were covered as well.

After that SBP auditor went through all applicable requirements of the standard covering management system, CoC, recordkeeping requirements. Later on the purchasing and sales offices were audited. During the process the overall responsible person for SBP system and other responsible staff having key responsibilities within the system were interviewed.

The second part of the audit focused mostly on energy data collection and SREGs issued to the customers. Existing trades were evaluated in the DTS as well as in the organizations accounting system.

During the closing meeting auditor explained the results of the audit and further actions were discussed.

4.3 Sampling methodology

Random sampling was used when checking the delivery documentation.

4.4 CB stakeholder engagement

N/A

4.5 Stakeholder feedback

N/A

5 Results

5.1 Main strengths and weaknesses

Strengths: The internal system is well organized, high quality supplier evaluation prior its acceptance, double evaluation of each delivery in terms of sustainability claims.

Weaknesses: The responsible personnel is changing quite frequently.

5.2 Rigour of Supply Base Evaluation

N/A

5.3 Collection and communication of data

Drax Power has previous experience with compilation of GHG and therefore all processes were already in place and the previous experience was materialized. The responsible person has a good overview about the energy data of the supplies and the system for recording this data is well managed.

5.4 Competency of involved personnel

The main responsible person in the company is the Sustainability Officer – Michael Goldsworthy ha shown a very good understanding of the SBP requirements. Michael is responsible for biomass sustainability in general, while Kevin Than is responsible for for verification of the correctness of claims and inputting data into the system as well as the energy data. Elliot Day is responsible for logistics, Sarah Young is responsible for recording of incoming material and Stuart Harker is responsible for EUTR compliance and biomass sustainability. During the interview all the personnel provided good understanding of the requirements in relation to SBP certification.

6 Review of company's risk assessments

6.1 Overview of company's risk assessments and mitigation measures

N/A

6.2 Specified risk indicators and mitigation measures

Country/Area	Indicator	Specified risk description	Mitigation measure
N/A	N/A	N/A	N/A

7 Non-conformities and observations

NC number NC-000681 (NCR 01/21)	NC Grading: Minor
Standard:	SBP Standard 4: Chain of Custody
Requirement:	IN 4B; 1.3 The SBP trademarks shall not be used in a way that could cause confusion, misinterpretation or loss of credibility to the SBP. SBP reserves the right to suspend or terminate permission to use the SBP trademarks if the organisation is failing to comply with the SBP trademark requirements as set out in this document. The interpretation of these rules is at the sole discretion of SBP.
Description of Non-conformance and Related Evidence:	
The Organization has included sufficient procedures for SBP trademark use in its DCS. A recent use for a Half a year report published on the website was correctly submitted for approval by the CoC manager, however the auditor noticed how the related presentation at https://www.drax.com/wp-content/uploads/2021/07/Drax-2021-HYR-Analyst-Presentation.pdf had not been submitted for approval. An internal investigation revealed how the presentation was put together by a temporary new Head of digital, who only joined the company last month, and was yet to receive chain of custody training. It emerged how on the temporary worker checklists and induction, the HR team had unintentionally omitted to include the Chain of Custody training as part of the mandatory criteria for temporary workers. This was rectified immediately. It was confirmed how all starter induction information and any other onboarding checklists that go to hiring managers now include the following: "Book Chain of Custody Training via sustainabilityteam@drax.com".	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

8 Certification decision

Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Olesja Puiso
Date of decision:	30 Sep 2021
Other comments:	N/A