



NEPCon OÜ Evaluation of Imperiya Green, Limited Liability Company Compliance with the SBP Framework: Public Summary Report

Second Surveillance Audit

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The promise of good biomass



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:	Aliaksandr Zubkevich
Audit team members:	Aliaksandr Zubkevich
Name of the Company:	Imperiya Green, Limited Liability Company
Company legal address:	Prospect Schmidta d.114/2, Mogilev region, 212035 Mogilev, Belarus
Company contact for SBP:	Oksana Voitava
Company contact email:	imperiya_grin@mail.ru
Company website:	N/A
SBP Certificate Code:	SBP-07-59
Date of certificate issue:	03 Mar 2020
Date of certificate expiry:	02 Mar 2025
Audit closing meeting date:	23 Dec 2021
Audit cycle:	Second Surveillance Audit

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:	Biomass Producer	☐
Approved Standards:	SBP Standard 2: Verification of SBP-compliant Feedstock; SBP Standard 4: Chain of Custody; SBP Standard 5: Collection and Communication of Data Instruction; Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.5	☐
Includes Supply Base Evaluation (SBE):	No	☐
Includes communication of Dynamic Batch Sustainability Data (DBSD)	Yes	☐
Includes Group Scheme	No	☐
Products	Pellets	☐

Feedstock types:	Secondary	☐
Feedstock origin (countries):	Belarus	☐
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-059406	☐
	Transfer	☐

2.1 Description of the company

Imperia Green is a company which has pellet plant and sawmill. In 2020 was started to work second pellet plant which is situated at the same site. Total annual production capacity of pellet plant is expected to be 26000 tones. Sawdust is used in pellet production as well as used for the drier. Secondary feedstock (slab wood, chips) wood is used for the drier. There are two production lines which are two small independent pellet plants located in the same building, facilities and using the same type of feedstock (secondary feedstock). The secondary feedstock used for pellet production originates from Belarus and is both FSC certified and non FSC certified. The BP has implemented segregating system – all non certified feedstock is process only on new production line. Biomass is stored in separate places. The BP implements FSC transfer system and produced biomass sold with FSC 100% claim. Pellet plant was commissioned in 2019, new line was added in 2020.

2.2 Detailed description of the Chain of Custody system

The BP holds valid FSC Chain of certificate, which cover both sawmill and pellet plant. <https://info.fsc.org/details.php?id=a02f300000gXVBhAAO&type=certificate> BP implements FSC transfer system of claims. The input material used by the Organisation for biomass production contains only secondary feedstock - sawdust for pellet production and for dryer. Secondary feedstock is used for the driers. Secondary feedstock (sawdust) was sourced from external suppliers (sawmills) and partly from own sawmill. The BP sourced for pellet production both FSC 100% feedstock (82,1 %) and non-certified feedstock (17,9%). The organization has the segregation system in place. Physical separation is implemented – FSC certified raw material is stored in special place and processed separately on new line, final products are segregated also. Incoming sawdust reception register and supplier list are maintained. All material is checked during the arrival and correctly recorded in the internal system.

3 Specific objective

The specific objective of this evaluation was to confirm that the Biomass Producer'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 BP's management procedures;
- Review of the production processes, production site visit;
- Review of FSC system control points, analysis of the existing FSC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients;
- GHG data collection analysis;
- Communication of Dynamic Batch Sustainability Data;
- Sales data evaluation and DTS.

4 Evaluation process

4.1 Timing of evaluation activities

<i>Audit Level of Effort (LoE)</i>		
Activity	Auditors	Auditor hours
1. Preparation	Aliaksandr Zubkevich	2,0
2. On-site (excl. travel time)	Aliaksandr Zubkevich	7,0
3. Report writing	Aliaksandr Zubkevich	8,0
4. Other	N/A	N/A

<i>Audit Schedule</i>			
Activity	Location	Auditor name	Date/time
<i>Open meeting</i>	Mohilev	Aliaksandr Zubkevich	23 Dec 2021/09:00
<i>Documents and procedures review (feedstock inputs, SBR, CoC control system and critical points, STD 5, energy data</i>	Mohilev	Aliaksandr Zubkevich	23 Dec 2021/09:20

<i>Site tour</i>	Mohilev	Aliaksandr Zubkevich	23 Dec 2021/15:20
<i>Closing meeting</i>	Mohilev	Aliaksandr Zubkevich	23 Dec 2021/16:30

Auditor qualification		
Auditor name	Role	Qualification
Aliaksandr Zubkevich	Lead auditor	Mr. Aliaksandr Zubkevich has an education of engineer-economist in timber industry. He finished a postgraduate at the Belarusian State Technological University Mr. Zubkevich passed the FSC FM/CoC Lead Auditor, the Legal Source, ISO 14001 and SBP training courses. He has experience in assessing woodworking companies and SBP(pre-) assessments in in Belarus.

4.2 Description of evaluation activities

Description of the audit evaluation:

Audit started with an opening meeting attended by the representatives from Organisation's management and staff.

Audit team leader introduced himself, provided information about audit plan, methodology, auditor qualification, confidentiality issues, and assessment methodology and clarified certification scope. During the opening meeting the auditor explained CB's approval related issues.

After that auditor went through all applicable requirements of the SBP standards nr. 2, 4, 5 and instruction document 5E covering input clarification, existing chain of custody system, management system, CoC, recordkeeping, emission and energy data and categorisation of input and verification of SBP-compliant biomass. During the process, overall responsible person for SBP system and other staff were interviewed. The auditor reviewed data registered in DTS. Chain of Custody implementation was reviewed focusing in the Critical Control Points, in particular it was verified reception of the material and it's classification, identification of feedstock origin, production process with the conversion factors associated, final product storage and sales

After a roundtrip around BP's pellet production was undertaken. During the site tour, applicable records were reviewed, staff was interviewed and FSC system critical control points were analysed.

At the end of the audit findings were summarised and assessment conclusions based on use of 3 angle evaluation method were provided to the management and SBP responsible person

4.3 Sampling methodology

Auditor visited office and pellet mill. All responsible for SBP were interviewed. Auditor sampled documents for April 2021 and November 2021.

4.4 CB stakeholder engagement

Stakeholder consultation was not conducted for this audit

4.5 Stakeholder feedback

None

5 Results

5.1 Main strengths and weaknesses

Strengths: Use of the FSC transfer system. Effective recordkeeping system. Small number of the management staff and clearly designated responsibilities within the staff members.

Weaknesses: No weaknesses identified by auditor.

5.2 Rigour of Supply Base Evaluation

Not applicable

5.3 Collection and communication of data

The following energy sources are used by BP: electricity for pellet production; diesel for feedstock handling, shipping and for biomass transportation to customer. Electricity consumption value is based invoicing from supplier; diesel consumption value is based on accounting system

5.4 Competency of involved personnel

Overall, BP staff showed good understanding of knowledge of all applicable SBP requirements. The following key staff members are involved to SBP certification: SBP related staff responsibilities are presented in Section 3 of the SBP Procedure. Interviewed staff was well familiar with their responsibilities. Generally, very few staff members are involved into SBP certification: SBP responsible/deputy director (maintaining of the management system, staff training, volume recording,), director (trademark use), chief of production of pellet plant (moisture measurements, weight of biomass produced), accountant (performance of outcoming invoices and transport documents).

6 Review of company's risk assessments

6.1 Overview of company's risk assessments and mitigation measures

Not applicable

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-001141 (04/21)		NC Grading: Observation	
Standard:		Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.5	
Requirement:		6.3.3 For each Feedstock Group the following parameters are recorded: a) Feedstock Group ID b) Feedstock Type c) Origin d) Physical Description e) Country of harvest (new row for each country) f) Raw mass as received in metric tonnes g) Moisture as received (weighted average, single figure) h) Weighted average distance (km) , i) Maximum distance (km) j) Type of vehicle used k) Fuel or driving force used by the vehicle, l) Weighted average truckload, m) Any pre-processing occurring outside the BP plant (chipping, drying, none)	
Description of Non-conformance and Related Evidence:			
It was explained by the SBP responsible that feedstock is measured at least ones per shift. Responsible – pellet shop master. The records then accumulated in excel sheet. The average moisture of feedstock for reporting period is 32.13% which is quite low. The SBP responsible explained that average moisture is low (32,12 %) due to feedstock is stored under shelter and some volume of noncertified feedstock was received as tertiary with moisture 17-20% in reporting period. It was found out that moisture meter used by the BP was not calibrated and which may influence mearuments results It is recommended to calibrate moisture meter to get more accurate data.			
Timeline for Conformance:		N/A	
Evidence Provided by Company to close NC:		N/A	
Findings for Evaluation of Evidence:		N/A	
NC Status:		N/A	

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):	Pilar Gorría
Date of decision:	23 Mar 2022
Other comments:	N/A