



# **NEPCon OÜ Evaluation of PRB Industry, Limited Liability Company Compliance with the SBP Framework: Public Summary Report**

NCR-verification audit

[www.sbp-cert.org](http://www.sbp-cert.org)



**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](http://www.sbp-cert.org)*

## *Document history*

*Version 1.0: published 26 March 2015*

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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:          | PRB Industry, Limited Liability Company                                                    |
| Company legal address:        | Ulitsa Shcolnaya 45; Vitebsk region, Rossonsky district, 211460 ag.<br>Klyastitsy, Belarus |
| Company contact for SBP:      | Aleksandr Girdyuk                                                                          |
| Company contact email:        | girdyuk.aleksandr@gmail.com                                                                |
| Company website:              | N/A                                                                                        |
| SBP Certificate Code:         | SBP-07-52                                                                                  |
| Date of certificate issue:    | 10 Feb 2020                                                                                |
| Date of certificate expiry:   | 09 Feb 2025                                                                                |
| Audit closing meeting date:   | 05 Jul 2021                                                                                |
| Audit cycle:                  | NCR-verification 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                                                                                                                                            | <input type="checkbox"/>              |
| 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 | <input type="checkbox"/>              |
| Includes Supply Base Evaluation (SBE):                             | No                                                                                                                                                          | <input type="checkbox"/>              |
| Includes communication of Dynamic Batch Sustainability Data (DBSD) | Yes                                                                                                                                                         | <input type="checkbox"/>              |
| Includes Group Scheme                                              | No                                                                                                                                                          | <input type="checkbox"/>              |
| Products                                                           | Pellets                                                                                                                                                     | <input type="checkbox"/>              |

|                                                                                                                                                                                                                             |                    |                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|--------------------------|
| Feedstock types:                                                                                                                                                                                                            | Secondary          | <input type="checkbox"/> |
| Feedstock origin (countries):                                                                                                                                                                                               | Belarus            | <input type="checkbox"/> |
| SBP-endorsed Regional Risk Assessments used:<br><br>Public link:<br><a href="https://sbp-cert.org/documents/standards-documents/risk-assessments/">https://sbp-cert.org/documents/standards-documents/risk-assessments/</a> | Not applicable     | <input type="checkbox"/> |
| Chain of custody system implemented:                                                                                                                                                                                        | FSC: NC-COC-056150 | <input type="checkbox"/> |
|                                                                                                                                                                                                                             | Transfer           | <input type="checkbox"/> |

## **2.1 Description of the company**

BP is a wood processing (primary) company located in Vitebsk region, Belarus. Design production capacity of pellet plant is 8000 tones. Company runs pellet production, as well as lumber production, which supplies secondary feedstock with FSC 100% claim to the pellet plant. Sawdust and offcuts are used in pellet production. Primary feedstock (dead wood, low quality stem wood) is used for the drier. The round wood used for primary production originates from Belarus and was with FSC 100% claim (97,4%) and as not certified (2,6%). The BP source small volume of FSC certified secondary feedstock from other sawmill. The BP implements FSC transfer system and produced biomass was sold with FSC 100% claim and as not certified. Pellet plant was commissioned in December 2019.

## **2.2 Detailed description of the Chain of Custody system**

BP implements FSC transfer system of claims. In reporting period 97,4% of round wood volume for primary processing is sourced with FSC 100% claim. After the reception, incoming volume of the primary feedstock (saw logs) is registered in Organisation's database and processed. Non certified roundwood is stored separately and marked with sing "Not certified". Produced non certified biomass is stored in special place marked with sinbg "Non certified". FSC and SBP certified pellets are produced of the FSC 100% secondary feedstock (sawdust, shavings), originating from own primary processing. FSC 100% primary feedstock (dead wood, low quality stem wood) is used into the drier.

### **3 Specific objective**

The specific objective of this evaluation was to confirm that the Biomass Producer has undertaken sufficient measures to close open major NCRs.

## 4 Evaluation process

### 4.1 Timing of evaluation activities

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

| <i>Audit Schedule</i>                  |                    |                      |                   |
|----------------------------------------|--------------------|----------------------|-------------------|
| Activity                               | Location           | Auditor name         | Date/time         |
| <i>Documents and procedures review</i> | Minsk (desk audit) | Aliaksandr Zubkevich | 04 May 2021/9:20  |
| <i>Closing meeting</i>                 | Minsk (desk audit) | Aliaksandr Zubkevich | 04 May 2021/11:00 |

| <i>Auditor qualification</i> |      |               |
|------------------------------|------|---------------|
| Auditor name                 | Role | Qualification |

|                      |              |                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Aliaksandr Zubkevich | Lead auditor | Mr Aliaksandr Zubkevich has education of engineer-economist in timber industry. He had postgraduate study at the Belarusian State Technological University. A. Zubkevich has passed FSC CoC/ FM lead auditor training course, Legal Source, ISO 14001 and SBP training coursed. Previous experience in woodworking industry and SBP pre-assessment and assessments in Belarus. |
|----------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## 4.2 Description of evaluation activities

Evaluation activities were focused on measures undertaken by the BP to close the major NCR. Documented evidences were provided to the auditor.

## 4.3 Sampling methodology

During audit were checked documents prepared by the BP. During audit were interviewed SBP responsible (deputy director) by phone.

## 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: See NCRs for details.

### **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 on metering; diesel consumption value is mostly based on theoretical calculations.

### **5.4 Competency of involved personnel**

Overall, BP staff showed good understanding of knowledge of all applicable SBP requirements. 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, trademark use), chief of pellet plant (moisture measurements, volumes), chief accountant (verification of incoming invoices and transport documents, performance of outgoing 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

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>NC number NC-000525<br/>(02/21)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>NC Grading: Major</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Standard:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | SBP Standard 4: Chain of Custody                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Requirement:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 5.1.2 The legal owner shall implement all aspects of the SBP-approved CoC system requirements for the SBP feedstock and biomass. Where there is a conflict between the requirements in the SBP-approved CoC system requirements and those specified in the SBP standards, the SBP standards shall have precedence. Note: SBP feedstock or biomass will not necessarily enter into the scope of the SBP-approved CoC system certification, but the SBP-approved CoC system CoC processes and requirements shall extend to SBP feedstock and biomass. |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| The BP holds valid FSC Chain of Custody certificate and implements FSC transfer system. Roundwood is received both with FSC 100% claim and non certified. Relevant supplier list is maintained. After the reception, incoming primary feedstock (saw logs) is registered in BP's database and processed at sawmilling facilities. Pellets are produced of the secondary feedstock both from own sawmill and from suppliers. The BP do not measure the volume of secondary feedstock from own sawmill used in pellet production. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Timeline for Conformance:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 3 months from the report finalisation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Evidence Provided by Company to close NC:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Feedstock consumption register (exh 2)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Findings for Evaluation of Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | The BP informed that starting from May new feedstock volume measuring approached was implemented. The BP has started to measure number of loaded shovels with feedstock. The measured total volume then recorded in accounting records.                                                                                                                                                                                                                                                                                                             |
| <b>NC Status:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Closed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

|                                        |                                  |
|----------------------------------------|----------------------------------|
| <b>NC number NC-000526<br/>(03/21)</b> | <b>NC Grading: Major</b>         |
| <b>Standard:</b>                       | SBP Standard 4: Chain of Custody |

|                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Requirement:</b>                                                                                                                                                                                    | 5.2.5 For all feedstock inputs the BP will keep input records. In addition to meeting the requirements specified in the SBP-approved CoC system being implemented, the input records will contain at least: a) Invoice reference(s) or other transaction number b) A description of the physical properties of the feedstock c) The volume of physical input d) The supplier e) Transaction date f) The certificate numbers of any certified suppliers For legal owners downstream of the biomass production process: Biomass inputs |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| The BP record feedstock input in Excel sheet. It was found out that roundwood input was recorded in Excel (2020-2021), but secondary feedstock from suppliers during reporting period was not recorded |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Timeline for Conformance:</b>                                                                                                                                                                       | 3 months from the report finalisation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Evidence Provided by Company to close NC:</b>                                                                                                                                                       | Updated record in Excel (exh 1)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Findings for Evaluation of Evidence:</b>                                                                                                                                                            | The BP has provided updated records of input and output material. The review of provided documents as well interview with SBP manager confirmed that input material was registered correctly.                                                                                                                                                                                                                                                                                                                                        |
| <b>NC Status:</b>                                                                                                                                                                                      | Closed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

|                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>NC number NC-000527 (04/21)</b>                                                                                                                                                                                                                                                                                | <b>NC Grading: Minor</b>                                                                                                                                                                                                                                   |
| <b>Standard:</b>                                                                                                                                                                                                                                                                                                  | SBP Standard 4: Chain of Custody                                                                                                                                                                                                                           |
| <b>Requirement:</b>                                                                                                                                                                                                                                                                                               | 6.3.1 The legal owner shall implement the requirements of either: PEFC 2002:2013 Section 9: Social, Health and Safety requirements in CoC, Or FSC-STD-40-004 V2-1 EN Section 1.6: Occupational Health and Safety Or the latest versions of these documents |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                            |
| H&S specialist is appointed in Organisation. Safety instructions have been developed and staff training is conducted when applicable (training logs have been reviewed by auditor). It was found out that not all protective equipment were issued to workers. / Специалист по охране труда имеется в организации |                                                                                                                                                                                                                                                            |
| <b>Timeline for Conformance:</b>                                                                                                                                                                                                                                                                                  | By the next surveillance audit, but no later than 12 months from report finalisation date                                                                                                                                                                  |
| <b>Evidence Provided by</b>                                                                                                                                                                                                                                                                                       | N/A                                                                                                                                                                                                                                                        |

|                                             |      |
|---------------------------------------------|------|
| <b>Company to close NC:</b>                 |      |
| <b>Findings for Evaluation of Evidence:</b> | N/A  |
| <b>NC Status:</b>                           | Open |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>NC number NC-000528 (02/20)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>NC Grading: Major</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Standard:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | SBP Standard 4: Chain of Custody                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Requirement:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 5.3.1 All requirements of the relevant chain of custody control system specified in the SBP-approved CoC system shall be implemented to calculate outputs.                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| BP is applying FSC transfer system. The following average conversion factor was established by BP based on factual measurements: 2,13 solid m3 of secondary feedstock (sawdust) for production of 1 tone pellets; 0.37 solid m3 of secondary feedstock (wood chips) for the drier for production of 1 tone pellets. It was explained by the BP staff that coefficients are received on factual measurements. The BP didn't provide auditor with any documented evidence of such factual measurements. Due to detailed explanation of how coefficients were received during interview and that coefficients looks reasonable for such type of production, minor noncompliance report was formulated by auditor. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Timeline for Conformance:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 3 months from the report finalisation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Evidence Provided by Company to close NC:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Audit 2020 Not provided Audit 2021 Feedstock consumption register                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Findings for Evaluation of Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Audit 2020 The BP has not provided evidences to close this non conformance. The NCR is upgraded to Major Audit 2021 The BP informed that starting from May new feedstock volume measuring approached was implemented. The BP has started to measure number of shovels. Based on several day measurments conversion factors were recieved as: 1.95 solid m3 of feedstock (with moisture 33%) per tonne of pellet and 0,33 solid m3 per tonne of pellet for the drier. The difference with theoretically calculated volume is 5% which is acceptable. |
| <b>NC Status:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Closed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

|                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                            |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| <b>NC number NC-000529<br/>(03/20)</b>                                                                                                                                                                                                                                                                                                                                                                        | <b>NC Grading: Minor</b>                                                                                                                   |
| <b>Standard:</b>                                                                                                                                                                                                                                                                                                                                                                                              | SBP Standard 4: Chain of Custody                                                                                                           |
| <b>Requirement:</b>                                                                                                                                                                                                                                                                                                                                                                                           | IN 4B; 1.7 Only the SBP logo artwork provided directly from the SBP secretariat shall be used.                                             |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                            |
| Annex 2 of SBP Procedure contains SBP trademarks requirement and BP is aware of this SBP requirement. The SBP logo artwork was used by the BP on Facebook<br><a href="https://www.facebook.com/groups/863721774087496/?source_id=112894023590364">https://www.facebook.com/groups/863721774087496/?source_id=112894023590364</a> prior certificate issuance and this logo was not provided by SBP secretariat |                                                                                                                                            |
| <b>Timeline for Conformance:</b>                                                                                                                                                                                                                                                                                                                                                                              | By the next surveillance audit, but no later than 12 months from report finalisation date                                                  |
| <b>Evidence Provided by Company to close NC:</b>                                                                                                                                                                                                                                                                                                                                                              | Facebook page<br><a href="https://www.facebook.com/groups/863721774087496/about">https://www.facebook.com/groups/863721774087496/about</a> |
| <b>Findings for Evaluation of Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                   | The SBP manager informed that SBP trademark was deleted from Facebook. It was confirmed by reviewing Facebook page of the BP.              |
| <b>NC Status:</b>                                                                                                                                                                                                                                                                                                                                                                                             | Closed                                                                                                                                     |

|                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>NC number NC-000530<br/>(04/20)</b>                                                                                                                                                                                                                                                                                       | <b>NC Grading: Minor</b>                                                                                                                                   |
| <b>Standard:</b>                                                                                                                                                                                                                                                                                                             | SBP Standard 4: Chain of Custody                                                                                                                           |
| <b>Requirement:</b>                                                                                                                                                                                                                                                                                                          | IN 4B; 3.3 When used on a non-white background a white space must be retained around the SBP logo artwork to clearly differentiate it from the background. |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                                                                                                                                                  |                                                                                                                                                            |
| The SBP logo art is used on Facebook page<br><a href="https://www.facebook.com/groups/863721774087496/?source_id=112894023590364">https://www.facebook.com/groups/863721774087496/?source_id=112894023590364</a> . White space was not retained around the SBP logo artwork to clearly differentiate it from the background/ |                                                                                                                                                            |
| <b>Timeline for Conformance:</b>                                                                                                                                                                                                                                                                                             | By the next surveillance audit, but no later than 12 months from report finalisation date                                                                  |
| <b>Evidence Provided by Company to close NC:</b>                                                                                                                                                                                                                                                                             | Facebook page<br><a href="https://www.facebook.com/groups/863721774087496/about">https://www.facebook.com/groups/863721774087496/about</a>                 |

|                                             |                                                                                                                               |
|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| <b>Findings for Evaluation of Evidence:</b> | The SBP manager informed that SBP trademark was deleted from Facebook. It was confirmed by reviewing Facebook page of the BP. |
| <b>NC Status:</b>                           | Closed                                                                                                                        |

## 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:                                                                                                                 | 29 Jul 2021            |
| Other comments:                                                                                                                   | N/A                    |