



NEPCon OÜ Evaluation of Bratsk Pellets LLC Compliance with the SBP Framework: Public Summary Report

First Surveillance Audit

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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

Version 1.0: published 26 March 2015

Version 1.1: published 30 January 2018

Version 1.2: published 4 April 2018

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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:	Roman Kurakin
Audit team members:	n/a
Name of the Company:	Bratsk Pellets LLC
Company legal address:	Ul. Dokovskaya 22/4, Bratsk district, Irkutsk region, 665771 Vihorevka, Russia
Company contact for SBP:	Grigoriy Vorontsov
Company contact email:	voron@alpirk.ru
Company website:	N/A
SBP Certificate Code:	SBP-07-97
Date of certificate issue:	11 May 2020
Date of certificate expiry:	10 May 2025
Audit closing meeting date:	30 Apr 2021
Audit cycle:	First 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 1.3	☐
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):	Russia	☐
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: FC-COC-001392	☐
	Transfer	☐

2.1 Description of the company

Organisation is a secondary manufacturer with the pellet production located in Irkutsk region, Russia. Annual production capacity of pellet plant is 25 000 tones. Only FSC-certified secondary feedstock used for FSC/SBP certified pellet production (sawdust) and heating (barks and sawdust). FSC-certified secondary feedstock is delivered from 4 suppliers (primary manufacturers). Feedstock is supplied by trucks. The final product is packed in big bags and transported to customers usually by railway – although SBP certificate scope covers biomass transport by different means of transport to different end points all over the world, on different Incoterms delivery conditions.

2.2 Detailed description of the Chain of Custody system

BP hold valid FSC CoC certificate <https://info.fsc.org/details.php?id=a02f300000jmdU3AAI&type=certificate> and implements transfer system of claims. Only secondary feedstock (sawdust) is used in pellet production. Claims for feedstock inputs and biomass outputs are FSC 100% and FSC Mix Credit. BP processing FSC 100% inputs separately from FSC Mix Credit inputs. When it is technically not possible (delivered feedstock is mixed at the warehouse), all produced biomass will be sold with FSC Mix Credit claim. Non-certified feedstock is not processed, neither used for heating.

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 and assessment of compliance with ID 5E ver. 1.0.

4 Evaluation process

4.1 Timing of evaluation activities

<i>Audit Level of Effort (LoE)</i>		
Activity	Auditors	Auditor hours
1. Preparation	Roman Kurkain	2,0
2. On-site (excl. travel time)	Roman Kurakin	13,0
3. Report writing	Roman Kurakin	16,0
4. Other	N/A	N/A

<i>Audit Schedule</i>			
Activity	Location	Auditor name	Date/time
<i>Opening meeting</i>	Office in Vikhorevka	Roman Kurakin	23 Apr 2021/0.5
<i>Documents and procedures review (FSC CoC documented procedures, feedstock inputs and biomass sales registration), staff interviews.</i>	Office in Vikhorevka	Roman Kurakin	23 Apr 2021/2.5

<i>Chain of custody review (site tour); staff interview</i>	Office in Vikhorevka	Roman Kurakin	23 Apr 2021/1
<i>Documents and procedures review (conversion factors, SAR and energy use primary data), staff interview.</i>	Office in Vikhorevka	Roman Kurakin	23 Apr 2021/1
<i>Continuation of the audit (SAR and energy use primary data)</i>	Office in Vikhorevka, Phone	Roman Kurakin	24 Apr 2021/4
<i>Continuation of the audit (SAR and energy use primary data)</i>	Office in Vikhorevka, Phone	Roman Kurakin	30 Apr 2021/3.5
<i>Closing meeting</i>	Office in Vikhorevka, Phone	Roman Kurakin	30 Apr 2021/0.5

Auditor qualification		
Auditor name	Role	Qualification
Roman Kurakin	Lead auditor	SBP lead auditor. He successfully passed SBP auditor training course in December 2016 in Amsterdam and participated in a number of SBP assessments and annual audits in Russia.

4.2 Description of evaluation activities

The audit visit was focused on management system evaluation: division of the responsibilities, document and system, input material classification (reception and registration), analysis of the existing FSC system and FSC system control points as well as the collection of the energy and emission data.

Description of the audit evaluation:

All SBP related documentation connected to the SBP as well as FSC system of the organisation, including SBP Procedures, GHG related data, Supply Base Reports, were evaluated during the audit.

Auditor was welcomed in the company. Audit started with an opening meeting.

Auditor introduced himself, provided information about audit plan, methodology, auditor qualification, confidentiality issues, and assessment methodology and clarified verification 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 documents 5e covering input clarification, existing chain of custody system, management system, CoC, recordkeeping/mass balance requirements, emission and energy data and categorisation of input and verification of SBP compliant feedstock/ biomass. During the process overall responsible person for SBP system and as well as other persons having key responsibilities within the system were interviewed.

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

At the end of the audit findings were summarised and assessment conclusion based on use of 3 angle evaluation method were provided to the representatives of the company.

4.3 Sampling methodology

The auditor conducted a spot check of documents for Aug, Feb 2021 and Apr. 2021.

4.4 CB stakeholder engagement

No stakeholder consultations conducted prior or during this annual audit.

4.5 Stakeholder feedback

No stakeholder comments are received.

5 Results

5.1 Main strengths and weaknesses

Strengths: use of FSC transfer system. Robust recordkeeping system. Good awareness of certification requirements by involved staff.

Weaknesses: no weaknesses identified.

5.2 Rigour of Supply Base Evaluation

n/a

5.3 Collection and communication of data

During the main assessment the BP has already implemented all the requirements for collection of energy data. See more details In Annex C of the report.

BP updated the data prior to the annual audit.

5.4 Competency of involved personnel

The SBP responsible staff has shown good understanding of the requirements in relation to SBP certification and FSC CoC system.

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-000537 (01/21, 55934)	NC Grading: Major
Standard:	SBP Standard 2: Verification of SBP-compliant Feedstock
Requirement:	IN2C; 4.1 The report shall be concise, covering the most important features, and shall be completed using the latest version of the SBR template for Biomass Producers downloaded from the SBP website.
Description of Non-conformance and Related Evidence:	
At the time of the approval of the report, the SBR is not fully completed. SBR cannot be approved.	
Timeline for Conformance:	3 months from the report finalisation
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:	29 Jul 2021
Other comments:	Major gaps are identified in SBR, the report could not be approved.