

NEPCon Evaluation of SBRS Logistics SIA Compliance with the SBP Framework: Public Summary Report

Main (Initial) Audit

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Completed in accordance with the CB Public Summary Report Template Version 1.4

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

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1 Overview

CB Name and contact:	NEPCon OÜ, Filosoofi 31, 50108 Tartu, Estonia
Primary contact for SBP:	Ondrej Tarabus otarabus@nepcon.org, +420 606 730 382
Current report completion date:	06/Apr/2020
Report authors: :	Olesja Puiso, Eriks Lidemanis
Name of the Company:	RBRS Logistics SIA legal address: Kaplavas 5-59, LV-1058, Riga, Latvia
Company contact for SBP: email:gailishs@gmail.com	Sergejs Gailiss, board member, Mob.: +371- 26330077,
Certified Supply Base:	Sourcing from Republic of Latvia
SBP Certificate Code:	SBP-07-83
Date of certificate issue:	07/Apr/2020
Date of certificate expiry:	06/Apr/2025

This report relates to the Main (Initial) Audit

2 Scope of the evaluation and SBP certificate

The scope of the certificate covers production of wood pellets and trading wood pellets: office of the organization – SIA RBSR Logistics office at Atlantijas str.23, Riga, Latvia (legal address Kaplavas str.5-59, Riga, LV-1058, Latvia) and the production site of subcontracting organization SIA Baltic Biogran SIA in Riga, Latvia,

The Biomass Producer's (BP) primary activity is trading of wood pellets and secondary activity - production of wood pellets. SIA RBSR Logistics outsources biomass – wood pellets production to SIA Baltic Biogran, which operates a wood pellet production site in Riga (single site).

As part of trading activities the BP is importing wood pellets from wood pellet manufacturers and exporting to clients in European Union without physical possession of material.

Scope of certificate includes: 1) trade of SBP pellets; 2) production of wood pellets using subcontractor SIA Baltic Biogran at Riga pellet mill for use in energy production and its transportation by different means of transport to different end points all over the world. The scope of the certificate does not include Supply Base Evaluation. The scope of the certificate includes communication of Dynamic Batch Sustainability Data.

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, SBR related reports.
- Review of the production processes at subcontractor, 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 SBP Standards utilised

4.1 SBP Standards utilised

Please select all SBP Standards used during this evaluation. All Standards can be accessed and downloaded from <https://sbp-cert.org/documents/standards-documents/standards>

- ☐ SBP Framework Standard 1: Feedstock Compliance Standard (Version 1.0, 26 March 2015)
- ☒ SBP Framework Standard 2: Verification of SBP-compliant Feedstock (Version 1.0, 26 March 2015)
- ☒ SBP Framework Standard 4: Chain of Custody (Version 1.0, 26 March 2015)
- ☒ SBP Framework Standard 5: Collection and Communication of Data (Version 1.0, 26 March 2015)

4.2 SBP-endorsed Regional Risk Assessment

Not applicable

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

The organization is a biomass trader /producer with an office in Riga and an outsourced production site situated in Riga town, Latvia. The office and the biomass production site are situated in different physical locations (addresses) and are different legal entities. The scope of activities also include biomass – wood pellet trading – buying SBP certified biomass within the FSC transfer system.

Currently no outsourced production is started at Baltic Biogran processing mill. In the reporting period (pellet mill was running as a independent producer, sourcing the material themselves.

It is planned that the RBRS Logistics will source and will supply secondary feedstock – wood industry residues (sawdust only) to subcontractor SIA Baltic Biogran SIA for production of wood pellets. SIA Baltic Biogran produce pellets exclusively for RBRS Logistics. Production volume designated in the subcontractor agreement complies with the Baltic Biogran production volume from the last production period. It is planned that full production capacities will be used for implementation of the agreement..

Wood pellets from own production will be used in biomass drier. It is also planned that the feedstock for pellet mill is sourced from 2-3 suppliers registered in Latvia and selling raw materials with Latvian origin.

For producing SBP-Compliant production the BP will be using FSC certified inputs within the FSC system of claims. Non-certified inputs are not accepted in production.

The Organisation itself holds a valid FSC Chain of Custody certificate TT-COC-006798, Pellet mill is certified as well, certificate number NC-COC-023987. Both the BP and the contractor organizations are implementing the FSC transfer system for control of feedstock sourced with FSC claims.

For production of FSC certified and SBP-Compliant feedstock the BP will be using FSC certified (FSC 100%, FSC Mix Credit) inputs. Non-certified feedstock is not accepted onsite.

The BP has some limited pellet storage capacity in the SIA Baltic Biogran production site. The BP will be selling wood pellets on DAP Riga conditions.

5.2 Description of Company's Supply Base

The BP is sourcing secondary feedstock – sawdust only for its pellet production. Production is taken place at outsourced production: company Baltic Biogran situated in Riga, Latvia. The declared origin of feedstock is the Republic of Latvia. Forests within the Supply Base are temperate.

Quantitative description of the Supply Base can be found in the Biomass Producer's Public Summary Report, published in the organization's website: www.rbrs.lv

5.2.1 The Republic of Latvia:

Latvia has the fourth highest forest cover among all EU countries, surpassed only by Finland (77 %), Sweden (76 %) and Slovenia (63 %). Forests in Latvia take up 3.412 million hectares of land, or 53% of the country's territory. The Latvian state owns around one-half of the country's forests, while most of the rest of the forest belongs to approximately 135,000 private owners. The amount of forestland, moreover, is constantly expanding, both naturally and thanks to afforestation of infertile land and other land that is not used for agriculture.

In 2019, the predominant forest species in Latvia are: Pine 33%, Birch 30 %, Spruce 19%, Grey Alder 7%, Aspen 7%, Black Alder 3 %, Other Species 1%. (State Forest Service data in Latvian Forest Sector in Facts & Figures 2020, published by the Ministry of Agriculture:

https://www.zm.gov.lv/public/ck/files/ZM/mezhi/skaitlifakti_ENG20.pdf)

An average of approximately 11 million m³ of timber have been harvested each year in Latvia's forests during the past decade. That is less than the annual increment, and so forestry in Latvia can be described as sustainable. (State Forest Service data in Latvian Forest Sector in Facts & Figures 2020, published by the Ministry of Agriculture: https://www.zm.gov.lv/public/ck/files/ZM/mezhi/skaitlifakti_ENG20.pdf)

The Latvian state owns around one-half of the country's forests, while most of the rest of the forest belongs to approximately 135,000 private owners. Forest ownership by status, 2019 (State Forest Service).

The forest sector in Latvia is under the supervision of the Ministry of Agriculture. It works with stakeholders to draft forest policies, development strategies for the sector, as well as regulations on forest management, the use of forest resources, environment protection and hunting. www.zm.gov.lv. The State Forest Service, under the Ministry of Agriculture, is the responsible agency for supervising how the provisions of the laws and regulations are observed in forest management irrespective of the ownership type. www.vmd.gov.lv. State-owned forests are managed by Stock Company "Latvian State Forests", which was established in 1999. It implements the state's interests in terms of preserving and increasing the value of the forest and enhancing the contributions of the forest to the national economy.

Limitations on economic activity apply to 28,2% of Latvia's forests at this time, and most of this territory is owned by the state. 683 especially protected environmental territories have been set aside to protect nature. Many are included in the unified and pan-European NATURA 2000 network of protected territories.

There are various restrictions on economic activity in the specially protected areas, ranging from a complete ban on forestry throughout the calendar year to a ban on tree felling in certain months of the year or on specific conditions for felling. Overall, in around 13.5% of Latvia's forests there are some form of forest management restrictions in place, in 3.4% of these areas all forest management activities are prohibited.

Due to the dramatic increase in forest cover in the last 100 years, the current proportion of old-growth forests in Latvia is low and as such, a major challenge of forest conservation in Latvia is to ensure that such old-growth forests and features are protected and allowed to develop. www.lvm.lv

According to the State Forest Service data, the total growing stock volume was 682 million m³ in 2019. Latvian forest land consists of:

Forest land consists of:

- Forests 3.04 mln. ha (90.6%);
- Marshes 0.17 mln. ha (5.1%);
- Glades 0.031 mln. ha (0.9%);
- Flooded areas 0.017 mln. ha (0.5%);
- Objects of infrastructure 0.081 mln. ha (2.4%);
- Other forest land 0.017 mln. ha (0.5%).

In historical terms, the intensive use of Latvia's forests for economic purposes began comparatively later than in many other European countries, and that has allowed us to preserve extensive biological diversity. Limitations on economic activity apply to 28,2% of Latvia's forests at this time, and most of this territory is owned by the state. 683 especially protected environmental territories have been set aside to protect nature. Many are included in the unified and pan-European NATURA 2000 network of protected territories.

In order to protect highly endangered species and biotopes located without the designated protected areas, if a functional zone does not provide that, micro-reserves are established. In 2018, the State Forest Service has established and maintained 2417 micro-reserves in forest lands with a total area of 43.7 thousand. ha, of which 91% of micro-restricted areas are in state forests, 7% - in private forests and 2% - in municipal forests. Identification and protection planning of biologically valuable forest stands is carried out continuously.

Moreover, there are national laws in place designed for the preservation of biological diversity and general nature protection requirements must be followed during the forest management activities. These are binding to all forest managers. These requirements stipulate that selected old and large trees, dead wood, underwood trees and shrubs, land cover around wet micro-lowlands (terrain depressions) are to be preserved at felling, thus providing habitat for many organisms.

Latvia has been a signatory of the CITES Convention since 1997. CITES requirements are respected in forest management, although there are no species included in the CITES lists in Latvia.

All forest area of Latvijas Valsts Meži as well as some part of forests in private and other ownership are FSC or PEFC certified. From a total forest area of 3.412 million hectares more than a half of Latvian forest areas have been certified according to FSC or PEFC certification scheme. Both the FSC and PEFC systems have found their way into Latvia.

5.3 Detailed description of Supply Base

Total Supply Base area (ha):	3,412 mln. ha
Tenure by type (ha):	1,67 mln.ha -state forests; 1,64 mln.ha private forests.; 0,102 mln.ha municipal
Forest by type (ha):	3,412 mln. Ha temperate
Forest by management type (ha):	3,412 mln. ha managed natural
Certified forest by scheme (ha):	1,13 mln. Ha FSC; 1,71 mln. ha PEFC

Detailed information about BP's supply base may be found in their Supply Base Report available in Internet

<https://rbrs.lv/wp-content/uploads/2020/04/biomasas-razotajs.pdf>

<https://rbrs.lv/wp-content/uploads/2020/04/Supply-Base-Report.pdf>

5.4 Chain of Custody system

BP holds valid FSC CoC certificate TT-COC-006798 . Only secondary feedstock (sawdust) with FSC 100% or FSC Mix credit claims will be used for pellet production and FSC transfer system of claims is implemented (all pellets will have FSC 100% or FSC Mix Credit claim).

Pellet trade is done within the scope of BP trader's activity. Only the pellets bought with SBP-compliant claims could be sold as SBP-compliant by the BP.

To calculate a conversion factor prior to this assessment, BP used data obtained from the Baltic Biogran pellet mill collected during the last reporting period (01.01.2019-31.12.2019), during the time plant operated as an independent organisation.

6 Evaluation process

6.1 Timing of evaluation activities

Onsite assessment was conducted on February 13, 2020-(appr. 3 hours), remote audit covering both BP and outsourced production was conducted at 24.03.2020 (8h x 2 auditors), Additional time was spent for the document review and evaluation at 23.03.2020 (4h x 2 auditors).

In total 3.5 auditor days were spent for the assessment audit.

Assessment activities included documents review at office, inspection of production facilities and staff interviews.

Activity	Location	Auditors	Date/time
Short opening meeting, FSC evaluation, evaluation of the CCP, roundtrip around the production facilities, interview of the production staff	Baltic Biogran production site	OP	13/02/2020 11.00-14.00
Opening meeting	Skype, RBRS Logistics SIA	OP, ELI	24/03/2020 9.30-10.00
Documents and procedures review (feedstock inputs, SBR, CoC control system and critical points, sales, compliance with legal requirements, staff interview.	Skype, RBRS Logistics SIA	OP, ELI	24/03/2020 10.00-13.00
Documents and procedures review (SAR and energy use energy data), staff interview	Skype RBRS Logistics SIA and Baltic Biogran SIA	OP, ELI	24/03/2020 13.00-16.00
Closing meeting	Office	OP, ELI	24/03/2020 16.00-16.30

6.2 Description of evaluation activities

Composition of audit team:

Auditor(s), roles	Qualifications
Oļesja Puišo, Riga, Latvia Lead Auditor evaluation against standards 2 and 4	Audit team leader. Olesja has passed CoC/ FM lead auditor training, PEFC CoC, ISO 140001, SAN and Legal Source training courses. Previous experience in woodworking industry as well as many years of experience within CoC auditing. She has passed the SBP lead auditor training and has participated on several SBP assessments.
Eriks Lidemanis Lead Auditor evaluation against standard 5	Audit team leader. Joined NEPCon in 2017. Holds bachelor's degree from Latvia University of Agriculture Forest Faculty (forest management). Previous work experience in wood processing industry and roundwood measurement. Ēriks has passed the NEPCon lead assessor training course in FSC Chain of Custody and FSC FM operations and obtained the FSC CoC/FM auditor qualification. And has participated in FM audits in Latvia, Lithuania and Russia. Successfully obtained SBP auditor qualification in 2019 and participated in SBP audits in Latvia

The evaluation 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 GHG data availability.

Description of the audit evaluation:

The evaluation started at 13.02.2020. After the short opening meeting and review of the FSC procedures and FSC related record review and staff interview, a roundtrip around pellet production mill was undertaken. During the site tour, applicable records were reviewed, staff was interviewed and FSC system critical control points were analysed.

All SBP related documentation connected to the SBP as well as FSC CoC system of the organisation, including SBP Procedure, SAR and GHG data calculations, Supply Base Report and FSC system description was provided by the company in the prior to the assessment, which started with an opening meeting attended by the representative of the BP.

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

After that auditors went through all applicable requirements of the SBP standards nr. 2, 4, covering input clarification, existing chain of custody system, management system, CoC, recordkeeping requirements, emission categorisation of input and verification of SBP-compliant biomass. During the process, overall responsible person for SBP system and other staff were interviewed.

At the second part of the audit, then representatives of outsourced production Baltic Biogran SIA joined auditors went through all applicable requirements of the SBP standards nr. 2, 4 and 5 covering CCP on production, existing chain of custody system, management system, CoC, recordkeeping requirements,

emission categorisation of input and verification of SBP-compliant biomass. During the process, overall responsible person for SBP as well as outsourced production staff was interviewed.

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

Impartiality commitment: NEPCon commits to using impartial auditors and our clients are encouraged to inform NEPCon management if violations of this are noted. Please see our Impartiality Policy here:

<http://www.nepcon.org/impartiality-policy>

6.3 Process for consultation with stakeholders

The stakeholder consultation was carried out on February 24, 2020 by sending direct email to different stakeholder categories. In total representatives of 45 stakeholders has been notified. The stakeholder structure according to type is as following: authorities and forestry and nature protection supervising institutions (35%), timber industry and nature conservation associations (30%), non-governmental organizations (20%), academia and scientific institutions (8%); and 6% - FSC national/regional representative, forest managers and other organizations. No comments from the stakeholders have been received.

7 Results

7.1 Main strengths and weaknesses

Strengths: use of the FSC transfer system t, with no non-certified feedstock accepted.. Effective recordkeeping system for both production and trade. Small number of the management staff in both production and trade and clearly designated responsibilities within the staff members.

Weaknesses: Production within the outsourced contract is not started, GHG data is based on the previous production experience of the outsourced production mill. See information in the NCR section of the report as well.

7.2 Rigour of Supply Base Evaluation

Not applicable.

7.3 Collection and Communication of Data

The following energy sources are used by BP: electricity for pellet production; diesel for feedstock delivery and handling; diesel for biomass handling and shipping; diesel for biomass transportation to customer. Diesel consumption value for internal transport is based on the actual refuelling data obtained in accountancy; electricity consumption by pellet plant and office facilities is based on readings obtained from installed electric meter.

7.4 Competency of involved personnel

Overall, BP staff showed good understanding of knowledge of all applicable SBP requirements. Generally, very few staff members are involved into SBP certification: main SBP responsible person/Board member of the RBRS Logistics SIA (SBP procedures and systems updates, SAR, SBR, complaints, conversion factor updates, SBR, FSC CoC system, DTS, SREG, volume summaries); Production manager of the outsourced production/ operators (registration of inputs and outputs volumes, registration of diesel and electricity consumption, production records; separate H&S responsible, Sales manager of the outsourced production (SAR data collection, FSC COC, production control). Prior to and during SBP assessment, BP was supported by external consultant, who also has provided relevant training to BP staff.

7.5 Stakeholder feedback

No comments received from stakeholders prior, during or after this assessment.

7.6 Preconditions

None.

8 Review of Company's Risk Assessments

Not applicable

9 Review of Company's mitigation measures

Not applicable.

10 Non-conformities and observations

Identify all non-conformities and observations raised/closed during the evaluation (a tabular format below may be used here). Please use as many copies of the table as needed. For each, give details to include at least the following:

- applicable requirement(s)
- grading of the non-conformity (major or minor) or observation with supporting rationale
- timeframe for resolution of the non-conformity
- a statement as to whether the non-conformity is likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks.

NC number 01/20	NC Grading: Major
Standard & Requirement:	SBP Standard #4, p. 5.1.2 The legal owner shall implement all aspects of the SBP approved CoC system requirements for the SBP feedstock or 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. (5.1.2) <i>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 the SBP feedstock or biomass.</i>
Description of Non-conformance and Related Evidence:	
During the evaluation it was identified that BP procedures cover requirements for subcontracting as well as information about the supplier agreements, however during the evaluation it was identified that there is no valid agreement endorsed in between subcontractor and the BP and it was not clear if the Baltic Biogran production is covered by the scope of the BP's FSC certificate.	
Timeline for Conformance:	Prior to (re)certification
Evidence Provided by Company to close NC:	Subcontractor agreement, letter to the FSC CB with appendixes
Findings for Evaluation of Evidence:	After the closing meeting the BP provided CB with the subcontractor agreement as well letter confirming letter its FSC CB is notified.

NC number 02/20	NC Grading: Minor
Standard & Requirement:	SBP Standard #5, Instruction document 5E, p. 3.1.9 3.1.9 An 'SBP Report on Energy and Carbon (SREG)' for Supplied Biomass for inland transport shall always be completed by BPs and Traders where biomass is supplied using inland transport outside the scope of a Static Data Identifier (SDI). (5E 3.1.9)
Description of Non-conformance and Related Evidence:	
The responsible person is aware of the requirement that transport of biomass shall be covered by SREG when SAR does not cover it, but the requirement is not explicitly specified in the documented procedures of the organization. Since the organization is also a trader and the requirement of the standard is applicable to the scope of SBP certificate, a minor non/conformity is raised.	
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:	Updated procedures
Findings for Evaluation of Evidence:	During the audit company updated their SBP procedures with requirement that during every Broker/trader sales activities SREG shall be used, and also a link where to search for the latest SREG version is added to procedures. All this is mentioned in SBP procedure section 20.3
NC Status:	Closed

NC number 03/20	NC Grading: Major
Standard & Requirement:	SBP Standard #5, Instruction document 5E, p. 6.2.2 7.3 The BP must inform its CB when a significant change in the operations occurs, resulting in a variation of electricity use or fossil fuel use greater than 25%. In that case, a new audit shall be required as soon as stable operations have been reached during three (3) consecutive months after the change has occurred. Examples may result from a change of production process, a plant refurbishment after an incident, a major change in feedstock used (e.g. use of logs instead of saw mill residues), change of fuel for drying (e.g. fossil fuel instead of biomass) etc.
Description of Non-conformance and Related Evidence:	
During the audit responsible person showed awareness of standard requirement, but auditors revealed that specific standard requirement is not described in SBP procedure. No written guidance available how this requirement will be implemented. Considering the set up of the biomass production (using outsourcing facilities) this requirement is considered as critical and therefore major NCR is raised.	
Timeline for Conformance:	Prior to (re)certification
Evidence Provided by Company to close NC:	Updated procedures

Findings for Evaluation of Evidence:	During the audit company provided auditors with updated procedures where is described necessary activities that must be taken from CH sides if a situation described in ID5E p 6.2.2 will appear. Actions are described in written form in SBP procedure sections 16.7 and 16.8. NCR is closed.
NC Status:	Closed

OBS 01/20	Standard & Requirement:	SBP Standard #2, p. 6.3 The BP shall ensure that the place of harvesting is within the defined SB. (6.3): Note: 'Place of harvesting' in the standard means the place of growth of the feedstock, i.e. the location of the tree stump
Description of findings leading to observation:	In order to ensure the place of harvesting is within the defined Supply Base, the BP will collect origin confirmation declaration for each supplier as well as validate the timber origin for all suppliers during the internal audits. According to documented procedures, the BP shall review timber origin documents based on sampling during the on-site audits to suppliers, confirming that "place of harvesting" is within the designated Supply Base. During the audit it was identified that no feedstock is delivered to the pellet mill and BP does not have any origin approved supplier. The pellet mill is brand new production in outsourced facilities, and therefore additional evaluation after 3-6 months from the beginning of the production might be needed. The BP is required to notify CB right after the production starts.	
Observation:	BP required to notify CB about the beginning of the production and provide information and records sufficient to prove "place of harvesting"/ origin.	

OBS 02/20	Standard & Requirement:	SBP Standard #5, Instruction document 5E, p. 6.10.3 To determine the effective load in metric tonnes per vehicle: in the case of trucks, the weight should be measured by a weighbridge, or equivalent, and recorded in a control system. Note: For transport by truck, train or flatboat the most important parameters are the distance and the capacity of the vehicle. It is usually enough to make a good estimate of the transport energy, based on proposed references by JRC and BioGrace. There is the option to record fuel use for transport, but this is not mandatory. For (long distance) sea transport fuel usage data must be provided. (5E, 6.10.3)
Description of findings leading to observation:	The BP does not have weighbridge installed. All feedstock is received and accounted in volume units. For volume-mass conversions the BP uses conversion tables. The BP is using conversion (reference) table provided by purchasers for estimating the mass of timber in bulk based on the average moisture content of feedstock.	

Observation:

To determine the effective load in metric tonnes per vehicle: in the case of trucks, the weight should be measured by a weighbridge, or equivalent, and recorded in a control system.

11 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):	Ondrej Tarabus
Date of decision:	06/Apr/2020
Other comments:	It is recommended to consider onsite visit of the pellet mill within 6 months after the production has been commissioned.