SBP
Sustainable Biomass Partnership

NEPCon Evaluation of PPUH W.G. Fabich Compliance with the SBP Framework: Public Summary Report

First Surveillance Audit

www.sustainablebiomasspartnership.org

Completed in accordance with the CB Public Summary Report Template Version 1.0

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

Document history

Version 1.0: published 26 March 2015

Contents

1 Overview

CB Name and contact:	NEPCon OÜ, Filosoofi 31, 50108 Tartu, Estonia
Primary contact for SBP:	Ondrej Tarabus ot@nepcon.net, +420 606 730 382
Report completion date:	07/Dec/2016
Report authors:	Ondřej Tarabus
Certificate Holder:	PPUH W.G.Fabich, Klosy 5, Drawsko Pomorskie, 78 500, Poland
Producer contact for SBP:	Ewa Rafałko, 94 36 360 73, ewa.rafalko@fabich.pl
Certified Supply Base:	Sourcing from Polish state forests (only the FSC certified part)
SBP Certificate Code:	SBP-01-20
Date of certificate issue:	8/Jun/2016
Date of certificate expiry:	7/Jun/2021

Indicate where the current audit fits within the certification cycle				
Main (Initial) Audit	**First Surveillance Audit**	**Second Surveillance Audit**	**Third Surveillance Audit**	**Fourth Surveillance Audit**
☐	X	☐	☐	☐

2 Scope of the evaluation and SBP certificate

The certificate scope covers the production site and production office facility in Drawsko Pomorskie, Poland.

The Organisation holds valid FSC Chain of Custody certificate (SGSCH-COC-070123), covering FSC certified (FSC 100%) pellet production.
http://info.fsc.org/details.php?id=a024000000NPLqnAAH&type=certificate&return=certificate.php

The input material used by the organisation for biomass production (both as raw material for pellet production and feedstock used into dryer) contains primary and secondary feedstock supplied by local suppliers.

All inputs materials delivered to the pellet production plant are FSC certified. Feedstock used in the biomass production originates from Poland only.

The BP is selling the pellets at the gate or at harbour of Szczecin. The end point Szczecin was updated to the scope of the evaluation during this annual audit.

Supply Base Evaluation is not included into the scope of the evaluation as soon as all the input material is FSC certified.

Scope of the evaluation is indicated in the table below:

<table>
<tr><th>Scope Item</th><th colspan="4">Check all that apply to the Certificate Scope</th><th>Change in Scope
(N/A for Assessments)</th></tr>
<tr><td>Approved Standards:</td><td colspan="4">SBP Standard #2 V1.0 SBP Standard #4 V1.0; SBP Standard #5 V1.0
http://www.sustainablebiomasspartnership.org/documents</td><td>☐</td></tr>
<tr><td>Primary Activity:</td><td colspan="4">Pellet producer</td><td>☐</td></tr>
<tr><td rowspan="5">Input Material Categories:</td><td colspan="2">☒ SBP-Compliant Primary Feedstock</td><td colspan="2">☒ SBP-Compliant Secondary Feedstock</td><td rowspan="5">☐</td></tr>
<tr><td colspan="2">☐ Controlled Feedstock</td><td colspan="2">☐ SBP non-Compliant Feedstock</td></tr>
<tr><td rowspan="3">☐ SBP-Compliant Tertiary biomass</td><td colspan="3">☐ Post-consumer Tertiary Feedstock</td></tr>
<tr><td colspan="3">☐ Post-consumer Tertiary Feedstock</td></tr>
<tr><td colspan="3">☐ SBP-approved Recycled Claim</td></tr>
<tr><td rowspan="2">Chain of custody system implemented:</td><td>☒ FSC</td><td>☐ PEFC</td><td>☐ SFI</td><td>☐ GGL</td><td>☐</td></tr>
<tr><td>☒ Transfer</td><td colspan="2">☐ Percentage</td><td>☐ Credit</td><td>☐</td></tr>
<tr><td>Use of SBP claim:</td><td colspan="2">☒ Yes</td><td colspan="2">☐ No</td><td>☐</td></tr>
</table>

SBE Verification Program:	☐ Low risk sources only	☐ Sources with unspecified/ specified risk	☐
	New districts approved for SBP-Compliant inputs:		
Sub-scopes			☐
Specify SBP Product Groups added or removed: N/A			
Comments: N/A			

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;

4 SBP Standards utilised

4.1 SBP Standards utilised

Verification of SBP-compliant Feedstock, SBP Standard 2, Version 1.0, March 2015

Chain of Custody, SBP Standard 4, Version 1.0, March 2015

Collection and Communication of Data, SBP Standard 5, Version 1.0, March 2015

Instruction document 5A Collection and Communication of Data version 1.0. March 2015 was utilised for the evaluation as well.

http://www.sustainablebiomasspartnership.org/documents

4.2 SBP-endorsed Regional Risk Assessment

Not applicable. Supply Base Evaluation is not covered by the Scope of the Evaluation.

5 Description of Biomass Producer, Supply Base and Forest Management

5.1 Description of Biomass Producer

The organization is a pellet producer. The production steps include debarking, chipping and pellet production. All primary feedstock is received from Polish State forestry enterprise with FSC 100% claim and the secondary feedstock from FSC certified suppliers also with FSC claim. The organization can produce both industrial and premium pellets. For biomass production are used chips from purchased roundwood and good quality saw dust from two suppliers. In the drying process is used bark from the purchased roundwood, and forestry chips delivered from forest residues (tops, thinning, branches etc.)

5.2 Description of Biomass Producer's Supply Base

The supply base contains all Polish state forest which are certified according FSC forest management certification. The internal procurement policy requires that all input material used in the pellet production is FSC 100% certified.

The total area of Polish state forest (6.920.292 ha) exceeds the total area of Supply Base (6.306.239 ha) as the Polish state forest includes also some forests that are not FSC certified.

Following forest inspectorates are excluded: Białowieża, Browsk, Hajnówka are excluded.

Polish State Forest

There is a constant increase of the forest area in Poland. According to 2013 data from the Central Statistical Office, forest area covers app. 9.3 million hectares, which is 29.4% of the country's territory. Forestry and the related industrial branches are important elements of the national economy. The State Forest Service gives employment to many people. It is the main supplier of wood processing plants. It cooperates closely with local communities and non-governmental organizations. In recent years, Polish State Forestry has achieved excellent economic results, because of the relatively good price for wood on the international market.

Buying timber from the Polish State Forests, our company is sure that the raw material is being procured in a legal manner, not prejudicial nature.

Forest planning and forest operations in Poland

For foresters and most other stakeholders in Poland the non-production forest functions have become the most important. The Polish State Forest implements sustainable forest management. Foresters acquire wood within the limits set by 10-year forest management plans, approved by the Minister of the Environment.

The Polish timber resources have grown from year to year and doubled in half a century. Wood stocks in the forests managed by the State Forests continue to grow. In 1991, it was 190 cubic meters/ha.; 20 years later, in 2011 – 254 cubic meters/ha. According to international statistics, Polish forests belong in this respect to European leaders. Not only considering wood stock, but also the forest area increase. In the mid-twentieth century, they occupied slightly over one-fifth of Poland; nowadays nearly than one-third.

In terms of spatial structure by species, coniferous species dominate in Polish forests, occupying 72.8% of the total forest area. Among coniferous species, pine covers the largest area.

5.3 Detailed description of Supply Base

Total Supply Base area (ha):	6.306.239 ha. State Polish Forests that are FSC certified (claim FSC 100%), and from which timber may be harvested.
Tenure by type (ha):	100% public ownership (State Polish Forest Service). The total Supply Base: 6.306.239 ha.
Forest by type (ha):	Temperate forests. The total Supply Base: 6.306.239 ha.
Forest by management type (ha):	Managed Natural forests. The total Supply Base: 6.306.239 ha
Certified forest by scheme (ha):	6.306.239 ha. FSC certified (100%)

Quantitative description of the Supply Base can be found in the Biomass Producer's Public Summary Report

http://fabich.pl/Files/SBP.pdf

5.4 Chain of Custody system

Organization holds valid FSC COC certificate with FSC transfer system for FSC 100% certified material in the scope. Controlled wood verification system is not included into the FSC certification scope of the company. In a future company foresee to include FSC Controlled wood system into the scope of the certification in case there would be a supplier delivering non-certified material.

Wood pellets are produced from sawdust, and round wood. Company is sourcing sawdust and from primary producers and roundwood form state forest (information about primary supplier is available in delivery documentation). In the dryer there are used also forest chips from thinnings, tree tops or branches delivered by the state forest enterprise.

All inputs are either FSC certified or segregated and resold unused. Therefore, the Supply base evaluation system is not applicable.

Incoming wood materials are weighted by weighbridge, and measurement data are recorded.

FSC material production was taking place prior to SBP assessment.

Wood pellets are mostly sold at the organization gate and transport is arranged by customer. There are also cases when sales are done at the harbour Szczecin where the material is delivered by the organization itself this audit has included this option to the scope of the evaluation.

6 Evaluation process

6.1 Timing of evaluation activities

The annual audit was carried out on 8th September 2016. One day was needed for the onsite audit and one additional day for the documentation review prior and after the audit.

Activity	**Location**	**Auditor(s)**	**Date/time**
Opening meeting*	Office,	OT, MW	08/09/2016 08.00-08.30
Documents and procedures review. Inputs review	Office,	OT, MW	08.30-10.00
Chain of custody review (site tour); interview with roundwood acceptance department	Production facilities	OT, MW	10.00– 11:30
Interview with Purchasing department representative	Purchasing department	OT, MW	11:30-12:30
Break			12:30-13:00
Interview with Sales department representative	Sales department	OT, MW	13:00-13:30
GHG calculation review	Office,	OT, MW	13:30-16:30
Internal team meeting	Office,	OT, MW	16:30-17:00
Closing meeting*	Office,	OT, MW	17:00-17:30
Estimated end of the evaluation			17:30

- OT – Ondrej Tarabus, MW – Michal Wajnberger

6.2 Description of evaluation activities

Auditor team was welcomed in Fabich head office site. Audit started with an opening meeting attended by owner of the company, quality manager, purchasing manager, sales manager and biomass production responsible person.

Lead auditor introduced the audit team, provided information about audit plan, methodology and aim of the assessment. CB's accreditation related issues and confidentiality issues were covered as well.

After that auditor went trough all applicable requirements of the standard covering management system, CoC, recordkeeping, emission and energy data and verification of SBP compliant. During the process overall responsible person for SBP system and over responsible staff having key responsibilities within the system was interviewed.

As a part of the audit, auditor visited raw material storage and production. 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. Considering the fact that all input material is FSC certified and the risk of mixing of material delivered from the saw mills with material from outside Poland is very low due to the fact that it would not be economically feasible the supplier audits were evaluated only on basis of the supplier audit reports and interview with internal auditor.

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

Audit team composition:

Auditor(s), roles	Qualifications
Ondrej Tarabus, Lead auditor, evaluation against all applicable requirements	Czech citizen, graduated in University of Life Sciences Prague, The Faculty of Forestry. He has participated in several FSC assessments in Czech Republic, Slovakia, Italy, Germany, Vietnam, Egypt, Spain, Romania, Bosnia and Herzegovina, Austria, etc. and FSC FM audits in Czech Republic and Lithuania. Ondřej Tarabus successfully completed SBP training course and he has practical experience with carbon footprint certification as well as biofuels certification.
Michael Wajnber Trainee auditor	Michał's main duties in NEPCon are auditing of FM and CoC certificate holders against FSC and PEFC standards, quality review of the reports from FSC FM and CoC audits, FM and CoC client support. He is also responsible for preparation of cost proposals and service agreements for FM clients. Michał is a contact person for FM clients from Poland and foreign countries, who possess FSC FM certificate. His previous experience include work for State Forest Enterprise as Forest Officer. Michał's educational background is Forest Management and Administration of Computer Networks. He has passed NEPCon's courses for FSC, PEFC and LegalSource auditor as well as the SBP lead auditor training.

6.3 Process for consultation with stakeholders

Consultation was not conducted for this surveillance audit.

7 Results

7.1 Main strengths and weaknesses

Strengths: SBP system elements are implemented at the time of the audit and remaining minor non-conformities were closed before the annual audit took place. The SBP responsible person as well as the whole team who participated on the implementation and maintenance of the system have proved very good understanding of the SBP requirements. The organization purchasing policy put pressure on purchasing only FSC 100% certified material and for the pellet production.

Weaknesses: The level of English of the SBP responsible person cause sometimes difficulties to understand properly the SBP requirements as these are only in English. See the NCR section of the report.

7.2 Rigour of Supply Base Evaluation

Not applicable.

7.3 Compilation of data on Greenhouse Gas emissions

The organization did have collected the data from many different sources. The collection of the required data was the main challenge for the company while getting ready for the assessment and there was a number of non-conformities linked to this requirement. Since then the organization has implemented solid system for recording and measuring the energy data.

7.4 Competency of involved personnel

The main responsible person for the SBP system is Ewa Rafalko, the quality manager of the organization. She has closely cooperated with Dominika Zebala who was helping significantly in collecting of the required data. Mrs. Rafalko as the main responsible person has provided the information about the individual requirement to all responsible workers in the company. All the aspects of the certification from the purchasing of the raw material, through the pellet production, record keeping, and collection of energy data to issue of sales documents were covered. The organization has allocated sufficient capacity for the implementation of the system however the knowledge of English language of the responsible person could cause some limitations in the future.

7.5 Stakeholder feedback

Not applicable.

7.6 Preconditions

Not applicable.

8 Review of Biomass Producer’s Risk Assessments

Not applicable

9 Review of Biomass Producer's mitigation measures

Not applicable

10 Non-conformities and observations

NCR number: NCR 01/16	**NC grading:**	**Major** ☐	**Minor** ☒
Standard & Requirement:	Standard #2 V1.0 - Verification of SBP-compliant feedstock - 2C - 1.1		
Description of Non-conformance:			
Updated SBR was not published on the BP website at the moment of the audit			
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.		
NCR conformance deadline:	07th March 2017		
Client evidence:			
Evaluation of Evidence:			
NCR Status:	**Open**		
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?			Yes ☐ No ☒

NCR number: NCR 02/16	**NC grading:**	**Major** ☐	**Minor** ☒
Standard & Requirement:	Standard #2 V1.0 - Verification of SBP-compliant feedstock - 2C - 3.1		
Description of Non-conformance:			
The updated version of the SBR was not provided to the SBP yet.			
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.		
NCR conformance deadline:	07th March 2017		
Client evidence:			
Evaluation of Evidence:			
NCR Status:	**Open**		
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?			Yes ☐ No ☒

NCR number: NCR 03/16	**NC grading:**	**Major** ☐	**Minor** ☒
Standard & Requirement:	Standard #2 V1.0 - Verification of SBP-compliant feedstock - 2C - 4.1		

Description of Non-conformance:				
The updates do not contain all the section as prescribed in the section 13 of the SBR. Not all aspects of the section 2.5 is reflected in the section with the updates.				
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.			
NCR conformance deadline:	07th March 2017			
Client evidence:				
Evaluation of Evidence:				
NCR Status:	**Open**			
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?				Yes ☐ No ☒

NCR number: NCR 04/16	**NC grading:**	**Major** ☐	**Minor** ☒
Standard & Requirement:	Standard #4 V1.0 - Chain of Custody - 5.4.1		
Description of Non-conformance:			
The organization sales invoices contain most the requirements above but the specification of the quantity of the batch data. There is no batch data code which would be linked to the material. Considering the fact that all the material produced shares the same batch data characteristics and this information is forwarded to the client on annual basis this non-conformity is considered as minor.			
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.		
NCR conformance deadline:	By next audit, but not later than 12 months after report finalisation date		
Client evidence:			
Evaluation of Evidence:			
NCR Status:	**Open**		
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?			Yes ☐ No ☒

NCR number: NCR 05/16	**NC grading:**	**Major** ☐	**Minor** ☒
Standard & Requirement:	Standard #5 V1.0 - Collection and Communication of Data - 8.1		
Description of Non-conformance:			
The SBR is publically available on BPs website. http://fabich.pl/Files/BPS-BaseReportANG.pdf However, the new updated version of the document was not updated at the moment of the audit.			

Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.		
NCR conformance deadline:	By next audit, but not later than 12 months after report finalisation date		
Client evidence:			
Evaluation of Evidence:			
NCR Status:	**Open**		
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?			Yes ☐ No ☒

NCR number: NCR 06/16	**NC grading:**	**Major** ☐	**Minor** ☒
Standard & Requirement:	Instruction Document 5A - Collection and Communication of Data - 8.2		
Description of Non-conformance:			
The SBP Procedure No. 2 requires to mention the batch code on sales documents. However, while reviewing the sales invoices it was revealed that the unique batch code was not included in the sales invoices. The organization has updated the sales invoices with the unique batch code but the code did not reflect the new reporting period (new batch code should be mentioned) and thus the non-conformity is not closed.			
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.		
NCR conformance deadline:	By next audit, but not later than 12 months after report finalisation date		
Client evidence:			
Evaluation of Evidence:			
NCR Status:	**Open**		
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?			Yes ☐ No ☒

11 Certification decision

Based on Organisation's conformance with **SBP requirements, the auditor makes the following recommendation:**	
☒	Certification approved: After closing the non-conformities above
☐	Certification not approved:
Based on auditor's recommendation and NEPCon quality review following certification decision is taken:	
NEPCon certification decision: **The Biomass producer has been certified by NEPCon as meeting the requirements of the specified SBP Standard, the certificate can be mantained immediately after SBP technical committee will approve the report.**	
Certification decision by: Olesja Puiso	
Date of decision**: 07 December 2016**	

12 Surveillance updates

12.1 Evaluation details

Please see in a section: p.6.2. Description of evaluation activities

12.2 Significant changes

There were no significant changes since the last audit.

12.3 Follow-up on outstanding non-conformities

NCR: 01/15	**NC Classification: Minor**	
Standard & Requirement:	SBP Standard # 2 requirement 6.2	
Report Section:	Appendix A p 1.3	
Description of Non-conformance and Related Evidence:		
The secondary feedstock is delivered from two suppliers. The suppliers are clearly identified (Ikea Industry and KPPD Szczecinek). The organization has proven the place of harvesting for the secondary feedstock through conduction of internal audits focused on checking the origin of the input material. The result of the audit has proved that the material comes from State forest from 3 directorates in case of KPPD and from 4 directorates in case of Ikea. The audit program was evaluated and the internal auditors were interviewed. The verification of the supplier audit program has revealed that while the organization has presented the process of the supplier audit the sampling of the checked delivery notes seem to be sufficient the supplier audit report did contain only three delivery notes which is not considered as sufficient.		
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.	
Timeline for Conformance:	12 months from the report closing	
Evidence Provided by Organisation:	The BP has provided the audit reports from the supplier audits.	
Findings for Evaluation of Evidence:	The supplier audit reports were evaluated and it was revealed that the BP has sampled sufficient number of the delivery notes to assure the origin is known.	
NCR Status:	**Closed**	
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?		Yes ☐ No ☒

NCR: 02/15	NC Classification: MAJOR
Standard & Requirement:	SBP Standard # 2 requirement: Instruction Note 2C point 4.1
Report Section:	Appendix A p 2.8
Description of Non-conformance and Related Evidence:	
There are several gaps in the information provided in the SBR: • Final harvesting program is very complicated to understand. There is some information, gap in analysis of the information and conclusion. • Standards 4 and 5 are missing on the tile page of the supply base report • point 2.5 a) the total supply base area is not correct. Based on the information provided by the organization the SB contain only Polish state forest which is covered by FSC forest management certificate, however, in the SBR is mention total area of Polish state forest • point 2.5 b) not hectares mentioned • point 2.5 c) not hectares mentioned • point 2.5 d) not hectares mentioned • point 2.5 e) the total supply base area is not correct. Based on the information provided by the organization the SB contain only Polish state forest which is covered by FSC forest management certificate, however, in the SBR is mention total area of Polish state forest • point 2.5 h) no percentage is mentioned and it is not clear from that statement if secondary feedstock is certified or not • Point 2.5 i) not all tree species are mentioned and scientific name is missing completely • point 2.5 j) states that all the primary feedstock comes from primary forest • point 2.5 k) states that all primary feedstock comes from primary forest • the organization did not provide information how the data about the "Final harvest sampling programme where collected" • point 10 does not describe if any action to support the credibility of the SBR was taken or not	
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.
Timeline for Conformance:	Precondition for issuance of the certificate
Evidence Provided by Organisation:	The organization has provided the updated version of the SBR to the auditor. http://fabich.pl/Files/SBP.pdf
Findings for Evaluation of Evidence:	Updated version of the SBR was evaluated and all issues mentioned in the non-conformity were addressed by the organization.
NCR Status:	**CLOSED**
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	Yes ☒ No ☐

NCR: 03/15	NC Classification: Minor
Standard & Requirement:	SBP Standard # 2 requirement 15.2
Report Section:	Appendix A p 3.2
Description of Non-conformance and Related Evidence:	
The procedure are in place. There are three SBP procedures. However, not all SBP requirement are covered. - trademark use is not fully described - sales procedures (there is no information about how the GHG and profiling information is used during the sales process as information that the SBP-compliant biomass will not be sold with non-certified biomass is missing) - documentation does not specify the requirements that records shall be kept for 5 years - compliant procedure cover only the SBR. Furthermore the organization has implemented arrangements for communicating in relation to feedback, including customer and third party complaints in procedure No. 1 point 7 (Exhibit 1 point 7). However, there are not included how the comments from customers and third party will be handled. - The organization has not implemented requirement about the support of their customers in development of the DDS. - Procedure which would describe how the energy and carbon data are collected is missing	
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.
Timeline for Conformance:	12 months from the report closing
Evidence Provided by Organisation:	The organization has provided updated set of procedures were the findings were addressed.
Findings for Evaluation of Evidence:	The SBP procedures were updated by the organization and send to the audit team on 09th March 2016. The procedure specifies: - trademark use is described in SBP procedure No. 3 point 3 - sales process is described in detail in procedure No.3 point 1 - The requirement that records shall be kept for 5 years is mentioned in SBP procedure No. 3 point 5 - compliant system is described in SBP procedure 1 point 7 - SBP Procedure No. 4 describes how the energy and carbon data are collected.
NCR Status:	**CLOSED**
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	Yes ☐ No ☒

NCR: 04/15	NC Classification: Minor
Standard & Requirement:	SBP Standard # 2 requirement 15.5
Report Section:	Appendix A p 3.5
Description of Non-conformance and Related Evidence:	
The organizations procedures does not contain the requirement that all the SBP related records shall be kept for 5 years. The responsible person is aware about the requirement, however, in case of aspects not controlled by the SBP responsible person there is a risk that such information would not be communicated.	
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.
Timeline for Conformance:	12 months from the report closing
Evidence Provided by Organisation:	The organization has provided updated version of the procedure No. 4.
Findings for Evaluation of Evidence:	The SBP procedure No. 4 (section 4) was updated by the organization and send to the audit team on 09th March 2016. The procedure specifies that all documents will be kept for time period of 5 years.
NCR Status:	**CLOSED**
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	Yes ☐ No ☒

NCR: 05/15	NC Classification: MAJOR	
Standard & Requirement:	SBP Standard # 2 requirement 19.2	
Report Section:	Appendix A p 12.2	
Description of Non-conformance and Related Evidence:		
The SBR is not signed by the senior management.		
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.	
Timeline for Conformance:	Precondition for issuing of the certificate	
Evidence Provided by Organisation:	The organization has provided updated supply base report signed off by the management. http://fabich.pl/Files/SBP.pdf	
Findings for Evaluation of Evidence:	Updated supply base report with signature of the management.	
NCR Status:	**Closed**	
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?		Yes ☒ No ☐

NCR: 06/15	NC Classification: Minor	
Standard & Requirement:	SBP Standard # 2 requirement 20.1	
Report Section:	Appendix A p 13.1	
Description of Non-conformance and Related Evidence:		
The organization has a complaint mechanism implemented in the SBP procedure No 1. However, this procedure cover only complaint or comments connected with SBR but not SBP certification as a whole.		
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.	
Timeline for Conformance:	12 months from the report closing	
Evidence Provided by Organisation:	The organization has provided updated version of the procedure No. 1.	
Findings for Evaluation of Evidence:	The SBP procedure No. 1 (section 7) was updated by the organization and send to the audit team on 09th March 2016. The procedure specifies that any complaint or remark in regards to any aspect of SBP certification will be evaluated.	
NCR Status:	**CLOSED**	
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?		Yes ☐ No ☒

NCR: 07/15	NC Classification: Minor	
Standard & Requirement:	SBP Standard # 4 requirement 5.2.2	
Report Section:	Appendix B p 2.1	
Description of Non-conformance and Related Evidence:		
The organization is sourcing all primary feedstock as FSC Certified however the secondary feedstock was not delivered with any certified claim before the assessment and the suppliers started to sell the material with FSC claim just before the assessment. The organization procedure No. 2 specify that only material received with a FSC claim on a purchasing documents can be accepted as compliant, however the suppliers were informed about this requirement just before the assessment and therefore there were only some few last invoices and delivery notes with FSC claim.		
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.	
Timeline for Conformance:	12 months from the report closing	
Evidence Provided by Organisation:	The organization has provided all the procurement invoices and delivery notes for secondary feedstock.	
Findings for Evaluation of Evidence:	The auditor has evaluated the purchasing supplier invoices and did not identified any breaches with the CoC system. All invoices contain the FSC claim and code and this was correctly recorded in the internal system.	
NCR Status:	**Closed**	
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?		Yes ☐ No ☒

NCR: 08/15	NC Classification: Minor
Standard & Requirement:	SBP Standard # 4 requirement 5.4.2
Report Section:	Appendix B p 4.2
Description of Non-conformance and Related Evidence:	
The organization has any certified customer at the moment of the assessment. The responsible person is aware about the requirement but the SBP procedures do not cover this point and there is not implemented the requirement that the certificate numbers shall be recorded.	
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.
Timeline for Conformance:	12 months from the report closing
Evidence Provided by Organisation:	The organization has provided list of customers (or potential customers).
Findings for Evaluation of Evidence:	The auditor evaluated the list of the customers and interviewed person responsible for the evolution of the validity of the customer certificates.
NCR Status:	**Closed**
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	Yes ☐ No ☒

NCR: 09/15	NC Classification: MAJOR
Standard & Requirement:	SBP Standard # 4 requirement 6.2.1
Report Section:	Appendix B p 6.1
Description of Non-conformance and Related Evidence:	
Organisation has collected data in compliance with the latest version of SBP Standard 5. The organization does not explain in their SBP procedures the follow up action in case the SBP standard would have change and also does not specify that the data collected must be certified according the last version of the standard 5. (Exhibit 11 of this report)	
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.
Timeline for Conformance:	Precondition for issuing of the certificate
Evidence Provided by Organisation:	The organization has provided updated version of the SBP procedure No. 4 where is specifically mentioned that in case of change in the SBP standard No. 5 they are responsible to adjust the procedures.
Findings for Evaluation of Evidence:	The auditor has reviewed the SBP procedure No. 4 provided by the organization as has find sufficient evidence that the organization implemented process which would take place in case the SBP standard No. 5 would change. Also additional interview with responsible person has revealed that the requirement is understood and will be followed.
NCR Status:	**Closed**
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	Yes ☒ No ☐

NCR: 10/15	NC Classification: Minor
Standard & Requirement:	SBP Standard # 4 requirement 6.4.1
Report Section:	Appendix B p 8.1
Description of Non-conformance and Related Evidence:	
The organization has implemented arrangements for communicating in relation to feedback, including customer and third party complaints in procedure No. 1 point 7 (Exhibit 1 point 7). However, there are not included how the comments from customers and third party will be handled.	
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.
Timeline for Conformance:	12 months from the report closing
Evidence Provided by Organisation:	The organization has provided updated version of the procedure No. 1.
Findings for Evaluation of Evidence:	The SBP procedure No. 1 (section 7) was updated by the organization and send to the audit team on 09th March 2016. The procedure specifies the details how the comments and complaint will be handled and recorded.
NCR Status:	**CLOSED**
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	Yes ☐ No ☒

NCR: 11/15	NC Classification: Minor	
Standard & Requirement:	SBP Standard # 4 requirement: Instruction Note 1.10	
Report Section:	Appendix B p 9.9	
Description of Non-conformance and Related Evidence:		
The organization do not intend to translate the name of the certification system however, is not covered by the organizations internal SBP procedure.		
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.	
Timeline for Conformance:	12 months from the report closing	
Evidence Provided by Organisation:	The organization has provided updated version of the procedure No. 3.	
Findings for Evaluation of Evidence:	The SBP procedure No. 3 (section 3) was updated by the organization and send to the audit team on 09th March 2016. The procedure specifies that Fabich does not intend to translate the name of the certification system.	
NCR Status:	**CLOSED**	
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?		Yes ☐ No ☒

NCR: 12/15	**NC Classification: Minor**
Standard & Requirement:	SBP instruction document # 5a requirement 2.1
Report Section:	Appendix C p 2.1
Description of Non-conformance and Related Evidence:	
The organization has implemented the system of using the SBP GHG and profiling information (SBP procedure 2 point 5). According the interview with the SBP responsible person the end-point is EXW incoterms but in the future it can be also FOB in Szczecin harbour. This end point is not specified in the SBP procedure and the organization has proved the ability to sell material only on EXW incoterms as the energy data do not cover transport and storage in the harbour.	
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.
Timeline for Conformance:	12 months from the report closing
Evidence Provided by Organisation:	The organization has provided updated version of the procedure No. 3.
Findings for Evaluation of Evidence:	The SBP procedure No. 3 (section 1) was updated by the organization and send to the audit team on 09th March 2016. The procedure specifies that at the moment Fabich´s end point is EXW.
NCR Status:	**CLOSED**
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	Yes ☐ No ☒

NCR: 13/15	NC Classification: Minor	
Standard & Requirement:	SBP instruction document # 5a requirement 3.3.1	
Report Section:	Appendix C p 4.3.1	
Description of Non-conformance and Related Evidence:		
The energy for used in forestry is calculated based on data provided by suppliers. However, there are not data of energy for planting and soil preparation included and furthermore the data for final felling and thinning are the same but it could be the case that the energy is different which was not proved by the organization.		
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.	
Timeline for Conformance:	12 months from the report closing	
Evidence Provided by Organisation:	The organization has provided data from forest operators about the energy used in forestry.	
Findings for Evaluation of Evidence:	The auditor evaluated the data provided and the records from the forest operators. Comparing these data with the common data available it was considered as correct data.	
NCR Status:	**Clsoed**	
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?		Yes ☐ No ☒

NCR: 14/15	NC Classification: MAJOR	
Standard & Requirement:	SBP instruction document # 5a requirement 3.7.1	
Report Section:	Appendix C p 4.7.1	
Description of Non-conformance and Related Evidence:		
The organization has recorded the data of diesel used haulage to the biomass plant. The organization has presented the information provided by the transportation companies about the average consumption of empty and full car as well as the average load and the km travelled are known as well. However, the information was provided only from two companies and the text including the figures was absolutely the same therefore the credibility of the information is in doubt. Furthermore, the value is not realistic.		
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.	
Timeline for Conformance:	12 months from the report closing	
Evidence Provided by Organisation:	The organization has contacted all the transport companies in regards to obtain the data. The emission and energy data were updated and provided to the auditor together with the evidence obtained from the transport companies. (Exhibit 10 of this report)	
Findings for Evaluation of Evidence:	The evidence from the transport companies was evaluated and the updated emission and energy table was checked. Additional interview was conducted with the responsible person in order to evaluate the methodology of the calculation. The data from the supplier is solid and provide good evidence for the calculation of diesel used for haulage of the feedstock.	
NCR Status:	**CLOSED**	
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?		Yes ☒ No ☐

NCR: 15/15	NC Classification: Minor
Standard & Requirement:	SBP instruction document # 5a requirement 6.1
Report Section:	Appendix C p 7.1
Description of Non-conformance and Related Evidence:	
The profiling information are provided for 12 month reporting period, however the period is not specified in the profiling information document which goes to with to client. Furthermore, even though the information about the forestry management practices are included in the profiling information they are not complete and does not describe at full extend the land and forestry management practices as required by the standard.	
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.
Timeline for Conformance:	12 months from the report closing
Evidence Provided by Organisation:	The organization has provided updated version of the profiling information document.
Findings for Evaluation of Evidence:	The profiling information document was updated by the organization and send to the audit team on 09th March 2016. The description of forest management practices is covered at sufficient extend in this document and the non-conformity can be closed.
NCR Status:	**CLOSED**
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	Yes ☐ No ☒

<table>
<tr><td>NCR: 16/15</td><td colspan="2">NC Classification: Minor</td></tr>
<tr><td>Standard & Requirement:</td><td colspan="2">SBP instruction document # 5a requirement 8.1</td></tr>
<tr><td>Report Section:</td><td colspan="2">Appendix C p 9.1</td></tr>
<tr><td colspan="3">Description of Non-conformance and Related Evidence:</td></tr>
<tr><td colspan="3">The organization has Batch specific data in place, containing all requirements. However, under the section material delivered from primary forest the organization claims that all input material (primary feedstock) is delivered from primary forest which is not correct.</td></tr>
<tr><td>Corrective action request:</td><td colspan="2">Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</td></tr>
<tr><td>Timeline for Conformance:</td><td colspan="2">12 months from the report closing</td></tr>
<tr><td>Evidence Provided by Organisation:</td><td colspan="2">The organization has provided updated version of the batch specific document.</td></tr>
<tr><td>Findings for Evaluation of Evidence:</td><td colspan="2">The batch specific document was updated by the organization and send to the audit team on 09th March 2016. The information about the content of the material from primary forest was corrected and the non-conformity can be closed.</td></tr>
<tr><td>NCR Status:</td><td colspan="2">CLOSED</td></tr>
<tr><td colspan="2">Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?</td><td>Yes ☐
No ☒</td></tr>
</table>

NCR: 17/15	NC Classification: Minor	
Standard & Requirement:	SBP Standard 2, Instruction note 2C, 2	
Report Section:	Appendix A p 2.6	
Description of Non-conformance and Related Evidence:		
SBR is available in both languages – English and Polish. However, the English part of the report is not translated well and there are several parts of the report which are not fully understandable.		
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.	
Timeline for Conformance:	12 months from the report closing	
Evidence Provided by Organisation:	The organization has provided reviewed version of the SBR.	
Findings for Evaluation of Evidence:	The auditor reviewed the English version of the SBR and even though the report is not in fluent English it is considered as clear to the reader and the non-conformity can be closed.	
NCR Status:	**Closed**	
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?		Yes ☐ No ☒

NCR: 18/15	NC Classification: Major	
Standard & Requirement:	SBP instruction document # 5a requirement 4.1.1	
Report Section:	Appendix C p 5.1.1	
Description of Non-conformance and Related Evidence:		
The organization has provided the data of the total quantity of feedstock used in production. There is roundwood used (based on the records from the excel file where all inputs are recorded) and saw dust (based on purchasing invoices from the supplier). The data provided by the organization in the GHG data sheet (document which is supposed to go to the client) are not in line with the data from the internal accounting system. The organization claims in the GHG data sheet that the feedstock used in the production during the reporting period was 29264t of feedstock. However, the accounting figures indicate that the volume used should be higher.		
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.	
Timeline for Conformance:	12 months from the report closing	
Evidence Provided by Organisation:	The organization has provided updated emission and energy data where the input material was recalculated and the final figure was corresponding with the data from the accounting system. (Exhibit 9 of this report)	
Findings for Evaluation of Evidence:	The emission and energy data were evaluated based on the data from the accounting system. The organization has used wrong conversion factor while recalculating the volume of feedstock from m3 to tones. The interview which took place after the audit revealed that the responsible person is aware about the methodology and the conversion factors available.	
NCR Status:	**CLOSED**	
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?		Yes ☒ No ☐

12.4 New non-conformities

See information about the new NCR identified during the surveillance audit is section 10 of the report. 10. Non-conformities and observations

12.5 Stakeholder feedback

No comments or comments from the stakeholders had been received.

12.6 Conditions for continuing certification

No preconditions are identified. List of open NCR is available is section 10. Non-conformationces and observations of the report.

12.7 Certification recommendation

It is recommended to maintain certification of the organisation.

13 Evaluation details

Primary Responsible Person: (Responsible for control system at site(s))	Ewa Rafalko
Auditor(s):	Ondřej Tarabus, Michal Wajnberger
People Interviewed, Titles:	- Ewa Rafalko – SBP responsible - Dominika Zebala – Sales department - Elzbieta Kurach - plant manager - Andrzej Gola - production manager - Jacek Tomkowiak - production - Jolanta Szumanska - accountant - Justyna Kiryk Ciemska – reception of the material - Walerian Fabich – owner
Comments:	N/A