



# **NEPCon OÜ Evaluation of Ecogran-prom plus, Limited Liability Company Compliance with the SBP Framework: Public Summary Report**

First Surveillance 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*

*Version 1.1: published 30 January 2018*

*Version 1.2: published 4 April 2018*

*Version 1.3: published 10 May 2018*

*Version 1.4: published 16 August 2018*

*Version 1.5: published 22 October 2020*

© Copyright The Sustainable Biomass Program Limited 2020

# Table of Contents

|          |                                                                |
|----------|----------------------------------------------------------------|
| <b>1</b> | <b>Overview</b>                                                |
| <b>2</b> | <b>Scope of the evaluation and SBP certificate</b>             |
| 2.1      | Description of the company                                     |
| 2.2      | Detailed description of the Chain of Custody system            |
| <b>3</b> | <b>Specific objective</b>                                      |
| <b>4</b> | <b>Evaluation process</b>                                      |
| 4.1      | Timing of evaluation activities                                |
| 4.2      | Description of evaluation activities                           |
| 4.3      | Sampling methodology                                           |
| 4.4      | CB stakeholder engagement                                      |
| 4.5      | Stakeholder feedback                                           |
| <b>5</b> | <b>Results</b>                                                 |
| 5.1      | Main strengths and weaknesses                                  |
| 5.2      | Rigour of Supply Base Evaluation                               |
| 5.3      | Collection and communication of data                           |
| 5.4      | Competency of involved personnel                               |
| <b>6</b> | <b>Review of company's risk assessments</b>                    |
| 6.1      | Overview of company's risk assessments and mitigation measures |
| 6.2      | Specified risk indicators and mitigation measures              |
| <b>7</b> | <b>Non-conformities and observations</b>                       |
| <b>8</b> | <b>Certification decision</b>                                  |

# 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:            | Siarhei Minkevich                                                    |
| Audit team members:           | none                                                                 |
| Name of the Company:          | Ecogran-prom plus, Limited Liability Company                         |
| Company legal address:        | 5th km of the Minsk shosse, Mogilev region, 213824 Bobruisk, Belarus |
| Company contact for SBP:      | Denis Shachenok                                                      |
| Company contact email:        | ecogran@tut.by                                                       |
| Company website:              | N/A                                                                  |
| SBP Certificate Code:         | SBP-07-64                                                            |
| Date of certificate issue:    | 11 Mar 2020                                                          |
| Date of certificate expiry:   | 10 Mar 2025                                                          |
| Audit closing meeting date:   | 25 Feb 2020                                                          |
| 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) |
|---------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| <b>Primary Activity:</b>                                                  | Biomass Producer                                                                                                                                                                                                                                 | <input type="checkbox"/>              |
| <b>Approved Standards:</b>                                                | 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 | <input type="checkbox"/>              |
| <b>Includes Supply Base Evaluation (SBE):</b>                             | No                                                                                                                                                                                                                                               | <input type="checkbox"/>              |
| <b>Includes communication of Dynamic Batch Sustainability Data (DBSD)</b> | Yes                                                                                                                                                                                                                                              | <input type="checkbox"/>              |
| <b>Includes Group Scheme</b>                                              | No                                                                                                                                                                                                                                               | <input type="checkbox"/>              |
| <b>Products</b>                                                           | Pellets                                                                                                                                                                                                                                          | <input type="checkbox"/>              |

|                                                                                                                                                                                |                     |                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|--------------------------|
| <b>Feedstock types:</b>                                                                                                                                                        | Secondary           | <input type="checkbox"/> |
| <b>Feedstock origin (countries):</b>                                                                                                                                           | Belarus             | <input type="checkbox"/> |
| <b>SBP-endorsed Regional Risk Assessments used:</b>                                                                                                                            | Not applicable      | <input type="checkbox"/> |
| <b>Public link:</b><br><a href="https://sbp-cert.org/documents/standards-documents/risk-assessments/">https://sbp-cert.org/documents/standards-documents/risk-assessments/</a> |                     | <input type="checkbox"/> |
| <b>Chain of custody system implemented:</b>                                                                                                                                    | FSC: SCS-COC-007347 | <input type="checkbox"/> |
|                                                                                                                                                                                | Transfer            | <input type="checkbox"/> |

## 2.1 Description of the company

BP is a pellet producing company located in Mogilev region, Belarus. Total annual production capacity of pellet plant is expected to be 6000 tones. Company runs pellet production and production of compound feed. Sawdust is used in pellet production as well as used for the drier. The secondary feedstock used for pellet production originates from Belarus and in reporting period is FSC certified (FSC 100%, FSC mix 100%). The BP implements FSC transfer system and in the reporting period produced biomass was sold with FSC mix 100% claim. According to the FSC procedure, non FSC certified feedstock can also be purchased. So that BP produces both FSC certified and not certified pellets. Non certified feedstock shall be stored separately with sign "Not FSC" and is segregated during all the production and storage processes. Non certified biomass shall be stored separately. At the time of audit non certified biomass was not at storage. In the reporting period certified biomass was produced. The biomass is transported by rail to Belarusian/Latvian border, Bigosovo railway station and Belarusian/Lithuanian border, Gudogai railway station as well as sold at factory gate. Pellet plant was commissioned in 2002. So that, biomass is delivered to the customer by means of railway service (railway wagons). Occasionally the deliveries can be made by the trucks (however it is not common mean of deliveries for export, but more typical transport for the internal market).

## 2.2 Detailed description of the Chain of Custody system

The BP holds valid FSC Chain of certificate  
<https://info.fsc.org/details.php?id=a02f300000lpUPaAAM&type=certificate> BP implements FSC transfer system of claims. The input material used by the Organisation for biomass production contains only secondary feedstock - sawdust for pellet production and for dryer. Secondary feedstock (sawdust) was sourced during reporting period from 3 external suppliers with FSC mix 100% and FSC 100% claims. In reporting period BP sourced for pellet production only FSC certified feedstock and FSC certified biofuel. BP can also buy non-certified feedstock. The organization has the segregation system in place. Physical separation is implemented – FSC certified raw material is stored in special place and processed separately in time when production line is cleaned of non-certified product, final products are segregated also. Incoming

sawdust reception register and supplier list are maintained. All material is checked during the arrival.

### 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. 1.3.

## 4 Evaluation process

### 4.1 Timing of evaluation activities

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

| <i>Audit Schedule</i>                                                               |                       |                   |                   |
|-------------------------------------------------------------------------------------|-----------------------|-------------------|-------------------|
| Activity                                                                            | Location              | Auditor name      | Date/time         |
| <i>Opening meeting</i>                                                              | Office                | Siarhei Minkevich | 28 Jan 2021/08:30 |
| <i>Chain of custody review (site tour); staff interview; document review onsite</i> | Production facilities | Siarhei Minkevich | 28 Jan 2021/08:45 |
| <i>Documents and procedures review, staff interview.</i>                            | Office                | Siarhei Minkevich | 28 Jan 2021/10:45 |

|                                                                                                                                       |        |                   |                   |
|---------------------------------------------------------------------------------------------------------------------------------------|--------|-------------------|-------------------|
| <i>Documents and procedures review (SBR, SBP procedures and critical points, energy use primary data), SAR data, staff interview.</i> | Office | Siarhei Minkevich | 25 Feb 2021/09:45 |
| <i>Closing meeting</i>                                                                                                                | Office | Siarhei Minkevich | 25 Feb 2021/16.30 |

| Auditor qualification |             |                                                                                                                                                                                                             |
|-----------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Auditor name          | Role        | Qualification                                                                                                                                                                                               |
| Siarhei Minkevich     | SBP auditor | NEPCon SBP, FSC FM/COC and FSC CoC/CW lead auditor. He has successfully passed SBP lead auditor training in Germany in September 2019 and participated in several SBP assessments in Belarus and Lithuania. |

## 4.2 Description of evaluation activities

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:

All SBP related documentation connected to the SBP as well as FSC CoC documentation of the organisation, including SBP Procedure, SAR and GHG data calculations, Supply Base Report, FSC system description was provided by the company in the beginning of the assessment, which started with an opening meeting attended by the representatives from Organisation's management and staff.

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

A roundtrip around BP's pellet production was undertaken. During the site tour, applicable records and documents were reviewed, staff was interviewed. Special attention was given to evaluation of critical CoC points of FSC CoC system, onsite data was analysed. Specific critical control points that were evaluated: reception, identification of material, segregation, volumes recording / accounting, conversion factor and sales.

After that auditor went through all applicable requirements of the SBP standards nr. 2, 4, 5 and instruction document 5E covering input clarification, existing chain of custody system, management system, CoC, recordkeeping/mass balance requirements, emission and energy data and categorisation of input and verification of SBP-compliant biomass. During the audit special attention was paid to the following specific critical control points: reception, identification of material, segregation, volumes recording / accounting, conversion factor and sales. During the process, overall responsible person for SBP system and other staff were 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>.

## **4.3 Sampling methodology**

Production facilities were checked without any exclusion. Reviewing of documents was based on sampling approach - several months were randomly selected (waybills and invoices for the selected months). All responsible personnel was interviewed.

## **4.4 CB stakeholder engagement**

The stakeholder consultation was carried out before assessment in 2019 (2019.12.19) by sending direct email to different stakeholder categories (more than 120 recipients). No comments from the stakeholders have been received. List of informed stakeholders includes such groups of stakeholders as FSC National Initiative, environmental and social NGOs, FSC-certified companies in the region, scientific and educational entities, indigenous peoples' communities (where applicable), state forestry authorities, trade unions etc.

## **4.5 Stakeholder feedback**

No comments from the stakeholders have been received before, during and after audit 2021.

## **5 Results**

### **5.1 Main strengths and weaknesses**

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

Weaknesses: No significant weaknesses identified by auditor. See section "Non-conformities and observations".

### **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 finished pellet handling, diesel for feedstock handling, shipping and for biomass transportation to customer. Electricity consumption value is based invoicing from supplier; diesel consumption value is based on accounting system.

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

Overall, BP staff showed good understanding of knowledge of all applicable SBP requirements. The following key staff members are involved to SBP certification: SBP related staff responsibilities are presented in Section 4 of the SBP Procedure. Interviewed staff was well familiar with their responsibilities. Generally, very few staff members are involved into SBP certification: SBP responsible/ head of marketing department (maintaining of the management system, staff training, volume recording, invoicing, DTS), chief of production of pellet plant (moisture measurements, weight of biomass produced).

# 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-000377<br/>(NC number 01/21)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>NC Grading: Minor</b>                                                                                                                                                                                  |
| <b>Standard:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | SBP Standard 2: Verification of SBP-compliant Feedstock                                                                                                                                                   |
| <b>Requirement:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | IN2C; 5.1 The SBR shall be formally updated every year (i.e. every 12 months). Each annual update shall provide actual values for the previous 12 months and forecast values for the following 12 months. |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                           |
| <p>Relevant requirement is known to SBP responsible person. SBR has been prepared and made publicly available on SBP Audit Portal. The report in general meets requirements. Organization has used the previous SBR from 2020. The review of the report showed that some data in SBR was not updated properly. The report contains outdated data. For example, the old classification of forests by functional purpose is given: forests of the first group, forests of the second group. At the same time, a new forest classification (new forest categories) is in force. In online SBR some data from the former SBR was used and therefore not all applicable new fields are filled in properly. The SBR was not updated as it is required. The report does not include updated (for the reporting period) number of suppliers. Supplier data are available in the BP Guidance.</p> |                                                                                                                                                                                                           |
| <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>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | N/A                                                                                                                                                                                                       |
| <b>Findings for Evaluation of Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | N/A                                                                                                                                                                                                       |
| <b>NC Status:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 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):                                                                                   | Pilar Gorría           |
| Date of decision:                                                                                                                 | 26 May 2021            |
| Other comments:                                                                                                                   | N/A                    |