



NEPCon OÜ Evaluation of Pelleta Bay, Limited Liability Company Compliance with the SBP Framework: Public Summary Report

Reinstatement Audit

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Completed in accordance with the CB Public Summary Report Template Version 1.5

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

Document history

Version 1.0: published 26 March 2015

Version 1.1: published 30 January 2018

Version 1.2: published 4 April 2018

Version 1.3: published 10 May 2018

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Version 1.5: published 22 October 2020

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1 Overview

Certification Body (CB) Name:	NEPCon OÜ
Primary CB contact for SBP:	Ondrej Tarabus
Primary CB contact email:	otarabus@preferredbynature.org
Audit team leader:	Siarhei Minkevich
Audit team members:	Siarhei Minkevich
Name of the Company:	Pelleta Bay, Limited Liability Company
Company legal address:	ul. Denisova 2a, room 74, Vitebsk region, 211500 Novopolotsk, Belarus
Company contact for SBP:	Vitaliy Yushchenko
Company contact email:	pelleta-by@tut.by
Company website:	N/A
SBP Certificate Code:	SBP-07-76
Date of certificate issue:	30 Mar 2020
Date of certificate expiry:	29 Mar 2025
Audit closing meeting date:	22 Feb 2022
Audit cycle:	Reinstatement Audit

2 Scope of the evaluation and SBP certificate

Scope Item	Check all that apply to the Certificate Scope	Change in scope (N/A for Assessments)
Primary Activity:	Biomass Producer	☐
Approved Standards:	SBP Standard 2: Verification of SBP-compliant Feedstock; SBP Standard 4: Chain of Custody; SBP Standard 5: Collection and Communication of Data Instruction; Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.5	☐
Includes Supply Base Evaluation (SBE):	No	☐
Includes communication of Dynamic Batch Sustainability Data (DBSD)	Yes	☐
Includes Group Scheme	No	☐
Products	Pellets	☐

Feedstock types:	Secondary	☐
Feedstock origin (countries):	Belarus	☐
SBP-endorsed Regional Risk Assessments used:	Not applicable	☐
Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/		☐
Chain of custody system implemented:	FSC: NC-COC-059413	☐
	Transfer	☐

2.1 Description of the company

Pelleta Bay LLC is a secondary processor (biomass producer) with production capacity of 3600 tone pellets/year, located in Vitebsk region, Belarus. BP was established in 2018 and has 13 staff members. The BP holds valid FSC CoC certificate covering biomass production and uses only FSC 100%-certified feedstock for SBP pellet production (wet sawdust) and heating (firewood, slabs, chips). All feedstock is purchased from external suppliers which are state forest management enterprises (in Belarus normally each state forest management enterprise has its own sawmill) as well as FSC certified private companies, etc. Feedstock is delivered to production site by BP's own trucks. 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). Some amount of feedstock is non FSC certified wood material. The BP ensures segregation technologies and produces both certified and not certified pellets. The BP implements FSC transfer system and produced biomass was sold with FSC 100% claim. Non certified feedstock is stored separately and is segregated during all the production and storage processes.

2.2 Detailed description of the Chain of Custody system

BP holds valid FSC CoC certificate <https://info.fsc.org/details.php?id=a02f300000k40ohAAA&type=certificate> covering the secondary (pellet production) wood processing. Secondary feedstock (sawdust) with FSC 100% is used for pellet production and FSC transfer system of claims is implemented (all certified pellets have FSC 100% claim). As biofuel BP uses slabs, chips, also firewood (with FSC 100% claim for SBP pellets and noncertified biofuel for the production of non-certified pellets). The organization uses biofuel from certified forestry organisations (firewood, chips) and from wood-working companies (slabs, chips) for heat generation. Some amount of biomass can be produced from non-certified secondary feedstock, and in this case BP ensures physical segregation of such non-certified feedstock from certified wood material at all stages. Some amount of pellets was sold to buyers without SBP certification. During the audit 2021 no NCRs were raised

on the CoC procedure and performance of chain of custody system.

3 Specific objective

The specific objective of this evaluation was to confirm the implementation of the Corrective Actions to close the open Major NCR

4 Evaluation process

4.1 Timing of evaluation activities

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

Audit Schedule			
Activity	Location	Auditor name	Date/time
<i>Review of supply base report. Closing meeting.</i>	Desk review	Siarhei Minkevich	22 Feb 2022/10:00

Auditor qualification		
Auditor name	Role	Qualification
Siarhei Minkevich	Lead auditor	NEPCon SBP lead auditor, 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
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4.2 Description of evaluation activities

The updated Supply Base Report is posted on the SBP Audit Portal. The content of the Supply Base Report was analyzed.

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4.3 Sampling methodology

The content of the updated Supply Base Report was analyzed. Other documents are not applicable as the NC was related to outdated and incorrect information in the supply base report 2021.

4.4 CB stakeholder engagement

n/a

4.5 Stakeholder feedback

n/a

5 Results

5.1 Main strengths and weaknesses

n/a

The audit was targeted at evaluation of corrective measures undertaken by the organization to meet major NCR

5.2 Rigour of Supply Base Evaluation

n/a

5.3 Collection and communication of data

n/a

The audit was targeted at evaluation of corrective measures undertaken by the organization to meet major NCR

5.4 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: SBP responsible person/director (SBP procedures and systems updates, SBR, complaints, conversion factor updates, DTS) and vice-director (SAR and energy use data collection). Prior to and during SBP assessment 2020, BP was supported by an experienced consultant from partner organisation from LT, who also has provided relevant training to BP staff. Prior SBP audit, BP was supported by external consultant from a partner organisation (LT business partner organisation).

6 Review of company's risk assessments

6.1 Overview of company's risk assessments and mitigation measures

n/a

6.2 Specified risk indicators and mitigation measures

Country/Area	Indicator	Specified risk description	Mitigation measure
N/A	N/A	N/A	N/A

7 Non-conformities and observations

NC number NC-001084 (01/21)		NC Grading: Major	
Standard:		SBP Standard 2: Verification of SBP-compliant Feedstock	
Requirement:		7.5 The SBR shall be updated at least annually (i.e. every 12 months).	
Description of Non-conformance and Related Evidence:			
Organization has prepared Supply Base Report (SBR) 2021 and made it publicly available on SBP Audit Portal. SBR version 2020 was used as a basis. However, the SBR was not properly updated as the SBR version 2021 consists incomplete data, e.g. the document SBR 2021 does not include a comparison of the scale of harvesting compared to other forest based industries in the region. The report does not provide data on the share of feedstock (in total harvests in the supply base) used for biofuel production. Not all required fields are properly updated in SBR published at SBP online Audit Portal (see field Explanation): Was the forest in the Supply Base managed for a purpose other than for energy markets? For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling? Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? Report was not fully filled in, see below. Section 3.1."Description of the supply Base". Country, area/region was not completed. Section "3.3. Feedstock inputs by feedstock type" is also missing. Not all requested fields are marked and the system doesn't allow approve and finish the SBR			
Timeline for Conformance:		Other	
Evidence Provided by Company to close NC:		CVA 2022: Supply Base Report posted on the SBP Audit Portal. Reinstate audit 2022: Supply Base Report posted on the SBP Audit Portal.	
Findings for Evaluation of Evidence:		CVA 2022: The head of the organization informed that there were technical problems with the login / password and access to the portal for the employees of the organization. Further, the organization restored access to the online portal. The organization has started making changes to the Supply Base Report (SBR) 2021, which is publicly available on the SBP Audit Portal. Analysis of the content of the SBR showed that the report had not been updated. The 2021 report is incomplete, for example the report does not include a comparison of the scale of harvesting compared to other forest-based industries in the region. The report does not provide data on the share of feedstock (in total harvests in the supply base) used for biofuel production. Not all required fields are properly updated in SBR published at SBP online Audit Portal (see field Explanation): Was the forest in the Supply Base managed for a purpose other than for energy markets? For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling? Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? Chapter 2 does not list all of the approved standards applicable to the organization. There is no web link to the publicly available version of	

	the Supply Base Report (see "Link to publicly available SBR"). Reinstate audit 2022: The responsible person of the organization had been making changes to the Supply Base Report (SBR) 2021, which is publicly available on the SBP Audit Portal. Within a few days, the auditor was analyzing the changes made by the organization and sending back several times the report for further work by the organization. Analysis of the content of the SBR materials showed that the report has been updated and currently contains the following data: - SBR 2021 includes a comparison of the scale of harvesting compared to other forestry-related industries in the region; - the report provides data on the share of wood raw materials (in the total volume of timber harvesting in the supply base) used for the production of biofuels; - required fields with comments have been completed in the SBR published on the SBP online Portal ("Explanation" fields). Clause 2 now provides the standards applicable to the organization. Web link to the publicly available version of the supply base report 2021 is added (see Link to publicly available SBR). Based on the analysis of the changes made to the supply base report, the auditor made the decision to close the major nonconformance.
NC Status:	Closed

8 Certification decision

Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Pilar Gorría
Date of decision:	23 Feb 2022
Other comments:	N/A