



NEPCon OÜ Evaluation of NeAlTom, Private production unitary enterprise Compliance with the SBP Framework: Public Summary Report

Scope Change 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

Version 1.4: published 16 August 2018

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:	-
Name of the Company:	NeAlTom, Private production unitary enterprise
Company legal address:	10D, Moskovskaya str. Minsk region, 222001 Krupki, Belarus
Company contact for SBP:	Inna Tobina
Company contact email:	kruplesproekt@mail.ru
Company website:	N/A
SBP Certificate Code:	SBP-07-96
Date of certificate issue:	06 May 2020
Date of certificate expiry:	05 May 2025
Audit closing meeting date:	26 Jan 2021
Audit cycle:	Scope Change 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 1.4	☐
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: Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/	Not applicable	☐
Chain of custody system implemented:	FSC: SCS-COC-008120	☐
	Transfer	☐

2.1 Description of the company

NeAlTom, Private Production Unitary Enterprise is a primary (sawmilling) and secondary processor (biomass producer) with production capacity of 7200 tones pellets/year, located in Minsk region, Belarus. Organisation was established in February 2016 (pellet production commissioned in the second half of 2019) and has in total 65 staff members (sawmill and biomass production), including 20 staff members at biomass production. Biomass production is located in village Proshika, Krupki district, Minsk region, and sawmill production is located in village Khudovtsy, Krupki district, Minsk region. This scope change audit targets at evaluation of newly commissioned pellet production line that launched at the same production site, at the same address and in the same building where the old production line has still been operating. Old operating line was evaluated during assessment 2020. Both lines are using the same feedstock and biofuel. Both production lines are technologically the same operating lines and produced pellets from both production lines are sold in the same batch. The BP holds valid FSC CoC certificate covering biomass production as well as sawmill production (chips, sawmill products are also in the certificate scope), and uses only FSC 100%-certified feedstock for pellet production. Feedstock is delivered to production site by BP's own trucks as well as by trucks provided by outsourced transport companies. 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 and implements FSC transfer system of claims – all round wood for primary processing at organisation' sawmill is sourced with FSC 100% claim. After the reception, incoming volume of the primary feedstock (saw logs) is registered in Organisation's database and processed. Pellets are produced of the FSC 100% secondary feedstock (sawdust, chips, slabs), originating from own primary processing. Organisation also purchased a certain amount of secondary feedstock from external suppliers. Some amount of non-certified feedstock can be delivered from non-certified suppliers.

When handling and processing non-certified feedstock physical segregation is applied. Non-certified biomass (physical segregation at all stages) are sold to the buyers who do not require SBP pellets status. During this scope change audit technology of physical segregation of the feedstock and finished products was checked.

3 Specific objective

The specific objective of this scope change audit is evaluation of newly commissioned pellet production line that launched at the same production site, at the same address and in the same building where the old production line has still been operating. Old operating line was evaluated during assessment 2020. Both production lines are technologically similar operating lines and produced pellets from both production lines are sold in the same batch. The scope change audit was carried out to evaluate the newly commissioned pellet production line 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.

4 Evaluation process

4.1 Timing of evaluation activities

Audit Level of Effort (LoE)		
Activity	Auditors	Auditor hours
1. Preparation	Siarhei Minkevich	0,5
2. On-site (excl. travel time)	Siarhei Minkevich	10,0
3. Report writing	Siarhei Mikevich	2,0
4. Other	N/A	N/A

Audit Schedule			
Activity	Location	Auditor name	Date/time
Scope change audit	Office and production site	Siarhei Minkevich	24 Nov 2020/10:00
Scope change audit	Office and production site	Siarhei Minkevich	26 Jan 2021/10:00

Auditor qualification		
Auditor name	Role	Qualification

Siarhei Minkevich	Audit team leader	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

SBP related documentation connected to the SBP as well as FSC CoC system of the organisation, including SBP Procedure, SAR and GHG data calculations, Supply Base Report, FSC system description was provided by the company in the beginning of the audit, 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 audit methodology and clarified audit scope. A roundtrip around BP's pellet production was undertaken. During the site tour, applicable records and documents were reviewed, staff was interviewed, Chain of Custody implementation was reviewed focusing in the Critical Control Points, in particular it was verified reception of the material and it's classification, identification of feedstock origin, production process with the conversion factors associated, mass balance, final product storage and sales. 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 process, overall responsible person for SBP system and other staff were interviewed.

4.3 Sampling methodology

Auditor interviewed key staff involved in SBP certification, randomly verified the documents related to SBP and did onsite inspection of the new pellet production line.

4.4 CB stakeholder engagement

not applicable.

4.5 Stakeholder feedback

no feedback received from stakeholders prior to, during or after this scope change audit.

5 Results

5.1 Main strengths and weaknesses

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.

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 feedstock handling, shipping and for biomass transportation to customer. Electricity consumption value is based on meter data. Meter data is monitored by state electricity organisation; diesel consumption value is based on actual refuelling data obtained in accountancy.

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 production (maintaining of the management system, staff training, trademark use), export manager (collection of energy use data), chief of pellet plant (moisture measurements), chief accountant (verification of incoming invoices and transport documents, performance of outgoing invoices and transport documents). Prior and during SBP scope change audit, BP was supported by external consultant, who also have provided relevant training to BP staff.

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**

N/A

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):	Nikolai Tochilov
Date of decision:	02 Jun 2021
Other comments:	N/A