



NEPCon OÜ Evaluation of Meža Birojs SIA Compliance with the SBP Framework: Public Summary Report

First Surveillance 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

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1 Overview

Certification Body (CB) Name:	NEPCon OÜ
Primary CB contact for SBP:	Ondrej Tarabus
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Audit team leader:	Girts Karss
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Company contact for SBP:	Anita Freija
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Company website:	N/A
SBP Certificate Code:	SBP-08-12
Date of certificate issue:	06 Jul 2020
Date of certificate expiry:	05 Jul 2025
Audit closing meeting date:	22 Jun 2021
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)
Primary Activity:	Biomass Producer	☐
Approved Standards:	SBP Standard 1: Feedstock Compliance Standard; SBP Standard 2: Verification of SBP-compliant Feedstock; SBP Standard 4: Chain of Custody; SBP Standard 5: Collection and Communication of Data Instruction	☐
Includes Supply Base Evaluation (SBE):	Yes	☐
Includes communication of Dynamic Batch Sustainability Data (DBSD)	No	☐
Includes Group Scheme	No	☐
Products	Chips	☐

Feedstock types:	Primary, Secondary	☐
Feedstock origin (countries):	Latvia, Estonia	☐
SBP-endorsed Regional Risk Assessments used: Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/	Latvia	☐
Chain of custody system implemented:	FSC: FSC: NC-COC-060544 PEFC CoC: Certificate No. 03-26/20-2	☐
	Credit, Transfer	☐

2.1 Description of the company

SIA Meža Birojs is timber and biomass trading company, with harbor and office located in North part of Latvia. One of the business operation is production of wood chips and wood chip trading. The BP operates office in Limbaži town and the biomass storage facilities situated in the territory of Salacgrīva port. The organization operates a storage site – logyard for both roundwood and chips in Salacgrīva port. The main business activity of the organization is timber harvesting, in addition to this Organisation is dealing with timber trading, biomass production and trading activities. The organization produces wood chips itself from logging residues and low quality roundwood. Only low quality roundwood, diseased wood or thinning wood of different species is used for producing the biomass from the roundwood. The BP is producing biomass – chips from logging residues and by chipping biomass from non-forest land – arboricultural arisings. The BP is buying logging residues and bush/brush from owners of forest land, harvesting companies and owners of non-forest land for chipping. In addition to this low quality primary feedstock is sourced as a logging residues and chipped from low quality wood (pulpwood and firewood) in Salacgrīva harbour. The BP is sourcing wood chips from logging residues and bushes from external suppliers The BP also source small amount of secondary feedstock – chips (co-products) from primary processors (sawmills). All primary feedstock originates from the territory of Latvia. Secondary feedstock originates from Latvia and Estonia. The BP is implementing FSC transfer and credit system as well as PEFC Chain of Custody system. FSC Transfer system is implemented for sales of certified timber in the internal market, i.e. controlling the certified material from the forest to the buyer in Latvia. FSC transfer system may also be used in Salacgrīva port in specific cases, e.g. for sales of FSC (FSC 100%) certified biomass in export markets. FSC Credit system is implemented in Salacgrīva port for controlling the SBP compliant feedstock. PEFC Physical Segregation Method (xx% PEFC) is used for volume control of PEFC certified biomass sales in local market as well as in export markets via Salacgrīva harbor. FSC, PEFC certified feedstock and the SBP – low-risk feedstock source that was approved within the SBE system is used for SBP compliant feedstock production. Non-certified feedstock is segregated. All feedstock is delivered to Salacgrīva port terminal by truck, where chips

are stored. In few cases low grade roundwood chipping is taking place at the port, where low grade roundwood logs are chipped. The trans-shipment and loading of chips onto vessels is taking place next to the wood chips storage site. Biomass (wood chips for energy production) are sold on FOB incoterm conditions in Salacgrīva port.

2.2 Detailed description of the Chain of Custody system

The BP is using both the FSC chain of custody systems to manage certified claims. The BP holds PEFC Forest Management certificate (Certificate No. 02-11/20-1) along with PEFC chain of custody certificate (Certificate No. 03-26/20-2). The BP is also holding FSC chain of custody certificate NC-COC-060544. FSC Transfer system is implemented for sales of certified timber in internal market, i.e. controlling the certified material from the forest to the buyer in Latvia. FSC transfer system may also be used in Salacgrīva port in specific cases, e.g. for sales of FSC (FSC 100%) certified biomass in export markets. FSC Credit system is implemented in Salacgrīva harbour for controlling the SBP compliant feedstock. FSC, PEFC certified feedstock and the SBP – low-risk feedstock source that was approved within the SBE system is used for SBP compliant feedstock production. The PEFC/FSC certified feedstock and SBP – low-risk feedstock that has been approved within the SBE system will be used for the SBP-compliant feedstock production and sales. After the SBP feedstock is received, feedstock of the applicable categories is stored in one pile. For roundwood and chips three feedstock categories - FSC100%, PEFC 100% and low-risk feedstock source that has been approved within the SBE system are used which are stored in 3 separate places/piles in the port logyard. “Other” feedstock/biomass is not sourced. Low quality FSC / PEFC certified roundwood is used for the biomass - chips production. It is segregated from other material by placing in separate pile in the terminal internal area. In rare cases roundwood will be chipped in the harbor logyard. Roundwood and chips are sold on FOB incoterm conditions at Salacgrīva harbour.

3 Specific objective

- Review of the BP's management procedures;
- Review of the production processes;
- 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 review of the applicable reports;
- Review of the BP's management procedures, including requirements designated in SBP standard SBP Standard #1 V1.0; SBP Standard #2 V1.0;
- Field visits of FMU to evaluate the risk mitigation measures;
- Evaluation of mitigation measures implemented for both primary and secondary feedstocks, including inspections of suppliers of primary (at FMU level);
- Review of the updated Supply Base Report;
- Assessing compliance against SBP Standard #5 V1.0 and accompanying Instruction Document 5E.
- Review of the reports and records, including DTS system information.

4 Evaluation process

4.1 Timing of evaluation activities

<i>Audit Level of Effort (LoE)</i>		
Activity	Auditors	Auditor hours
1. Preparation	OP, GK	8,0
2. On-site (excl. travel time)	OP, GK	40,0
3. Report writing	OP, GK	16,0
4. Other	N/A	N/A

<i>Audit Schedule</i>			
Activity	Location	Auditor name	Date/time
<i>opening meeting</i>	Limbazi Office	OP and GK	25 May 2021/10:00
<i>CoC system and CCP</i>	Limbazi Office	OP	25 May 2021/10:30
<i>Collection of information regarding SBP SBE and FSC CW mitigation activities</i>	Limbazi Office	GK	25 May 2021/10:30
<i>Evaluation of</i>	Inspection of 4	GK and OP	26 May 2021/9:00

<i>supplies of primary feedstock</i>	FMUs		
<i>Salacgrīva harbour visit</i>	Salacgrīva harbour visit	OP and GK	26 May 2021/14:00
<i>Fial reviewing documents</i>	Office visit in Limbaži	OP and GK	26 May 2021/15:00
<i>SBP SBE management system review. STD 1</i>	Remote meeting (MS Team)	OP and GK	21 Jun 2021/10:00
<i>Continue</i>	Remote meeting (MS Team)	OP and GK	21 Jun 2021/12:00
<i>Review and closing of ASI Incident IN-2776, overall audit closing</i>	Remote meeting (MS Team)	OP and GK	01 Oct 2021/10:00

Auditor qualification		
Auditor name	Role	Qualification
Ģirts Karss	Standards #1, #2	Works for NEPCo since 2011 Ģirts Karss holds MSc in Environmental Science from the Lund University and the University of Latvia. He has passed the Rainforest Alliance lead assessor training course in FSC Forest Management and FSC Chain of Custody operations and obtained the FSC lead auditor qualification. Ģirts Karss has conducted of FSC Chain of Custody audits in wood industry companies in Latvia and FSC forest management assessments and annual audits in Baltic countries and Russia. Ģirts had completed SBP training course and has participated in a number of SBP assessments, scope change and annual audits including Supply Base Evaluation in scope in Latvia and other countries.

Oļesja Puišo (OP)	Audit team leader, standards #4, #5	Olesja has passed CoC/ FM lead auditor training, PEFC CoC, ISO 140001, SAN and Legal Source training courses. Previous experience in woodworking industry as well as many years of experience within CoC auditing. She has passed the SBP lead auditor training and has participated on several SBP assessments.

4.2 Description of evaluation activities

Annual surveillance audit was carried out as an onsite audit/partial remote audit. Majority of office work was done onsite as well as field work was conducted as an on-site audit, but remote audit covered part of the office audit (part of the office audit, and closing meeting). The aim of the audit is to verify the compliance of the organization to SBP standard requirements, including the SBP SBE system used by the organization in sourcing of primary feedstock and conducting mitigation measures.

25th of May 2021

Joint FSC COC/ CW and SBP audit began with an desk opening meeting attended by the responsible persons of the organization –Board member responsible person for SBP certification, Director and Environmental specialist (Consultant) of the organization. At the opening meeting lead auditor introduced the auditing team, provided information about the audit plan, methodology, auditor qualification, rules, confidentiality issues, and audit methodology and clarified verification scope. Auditor explained the aim and objectives of the audit, informed about the evaluation process, underlined the need to collect objective evidence through a combination of document review, site visits, interviews and discussions, explained the essence and importance of sampling aspect of the auditing..

After the opening meeting, the responsible staff informed about general changes in FSC COC/ SBP system and biomass production process.

Auditors carried out FSC COC/ CW system evaluation (incoming material registration, supplier information, recordkeeping, system related quality requirements, credit account, conversion factors and sales, procurement and sales documents are verified based on sampling) in parallel questions related to SBP/ SBE system were clarified.

At the end of the day sites (suppliers) related to risk mitigation of primary feedstock (Indicators 2.1.1, 2.1.2 and 2.8.1) have been selected for verification audit. See the details of sampling described below in Section 7.2.

26th of May, 2021

Selected FMUs was visited, 1 FMU for evaluation of Health and Safety issues and 4 FMUs for evaluation of HCV risk mitigation measures in completed logging sites (see the list of visited FMUs above in Section 2.1 in the time table).

The auditors carried out the field inspections at the FMU level. Auditors were evaluating how High Conservation Value risk mitigation measures were evaluated in 4 FMU where the primary feedstock was sourced by the BP and at the same time doing their own independent evaluation of the suppliers to verify the correctness of the mitigation measure. In 1 FMUs the auditors evaluated how the representatives of BP assess the compliance of Health and safety issues regarding indicator 2.8.1.

After FMU field visits harbor terminal was visited. During the visit receptionist was interviewed, recordkeeping system reviewed and records verified for accuracy, process of wood reception, storage and loading into vessel was discussed in details. Storage site was visited and type of feedstock in storage were identified.

28th of May 2021

Closing of FSC COC evaluation, providing preliminary result of SBP onsite evaluation was provided to Board member, Director and Environmental specialist (consultant).

21th of June 2021

Auditors, reviewed documented procedures and records provided by the company prior to the visit. Audit team made a review of SBR and made interviews regarding the Supply Base Report.

After this auditors went through all applicable requirements of the SBP standard No., 5 and instruction document 5E covering input clarification, existing chain of custody and controlled wood systems, management system, CoC, recordkeeping/mass balance requirements, emission and energy data and categorization of input and verification of SBP compliant and SBP Controlled feedstock/ biomass. Overall responsible person for SBP system having key responsibilities within the system was interviewed during the process.

22th of June 2021

Further on the auditors discussed open NCRs and questions related to the SBP (SBE) system – effectiveness, monitoring, supplier review, evaluation of suppliers and risk mitigation measures

At the end of day, the preliminary audit findings were summarized, and audit conclusion based on use of 3 angle evaluation method were provided to the responsible persons at the company – the board member and Environmental specialist (consultant).

October 1, 2021

A formal dispute resolution process initiated as per ASI incident-2776, was finalized. Preferred by Nature has concluded its formal dispute resolution process following the dispute submitted to Preferred by Nature on 02.07.2021. A summary of Preferred by Nature evaluation findings, resolution of Preferred by Nature, and follow up actions we provided to ASI. ASI approved the dispute resolution findings on 08.10.2021

4.3 Sampling methodology

Description of sampling During the office audit auditors conducted the sampling of the suppliers and FMUs for field inspections. Auditors made a plan for field inspections based on sampling, selecting for inspection feedstock suppliers included into Supply Base Evaluation: The following considerations have been taken into account to establish as sample and the sampling intensity: 1) Geographical area; 2) Type of the operations and activities; 3) Risk mitigation measures related to origin and mixing. Geographical area:

BP is sourcing the primary feedstock included into SBE from Latvia. The BP is sourcing feedstock from Vidzeme region in Latvia primarily. So, FMUs and properties of non-forest lands from sourcing region shall be included in the sample. Type of the operations and activities: The SBE covers sourcing of primary feedstock (logging residues, branches, low quality roundwood etc.) from forest and non-forest lands. Thus, both FMUs in forest lands and properties of non-forest lands shall be included in the sample. Risks identified in the SBP risk assessment for Latvia: Regarding the feedstock origin for Latvia, the following risks considered as specified in Regional Risk Assessment endorsed by SBP: 2.1.1 Forests and other areas with high conservation values in the Supply Base are identified and mapped; 2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed; 2.8.1 Appropriate safeguards are put in place to protect the health and safety of forest workers. To evaluate the risk mitigation measures implemented by BP for indicators 2.1.1 and 2.1.2, planned harvesting sites and sites after harvesting should be included in the sample. To evaluate the risk mitigation measures implemented by the BP for indicator 2.8.1, ongoing harvesting site should be included in the scope of sampling plan. Sampling intensity: Auditors sampled sites for field inspections in timber sourcing region (Vidzeme) using the risk based approach. Sampled sites were selected from forest land where presence of habitats of EU importance were identified and registered in the data base "Ozols". Part of FMUs were chosen after analysis of forest inventory data for WKH characteristics in potential WKH sites according tool "Latbio". The total number of FMUs selected to visit in field evaluations was determined based on information from the database "Ozols", where FMUs with presence of EU habitats/WKHs were identified in any of compartment. The approximate target number of 4 logging sites/compartments was determined using following relationship: $0.8 \times \sqrt{x}$, where x- the total number of FMUs, where the BP had conducted risk mitigation measures (18). The total number of FMU were considered, no subsets (forest lands/non-forest lands) were used, but both forest and non-forest lands were included in the sample. As to non-forest [PGS1] [GK2] land, only agriculture lands with HCVs (non-forest habitats) registered were visited. In total 4 FMUs in Vidzeme region were inspected. 1 ongoing logging works site was visited, in order to evaluate health and safety risk mitigation measures.

4.4 CB stakeholder engagement

Stakeholder consultation was carried out by both the Biomass Producer and the Certification Body prior to the assessment last year. In order to close the non-conformity NCR 02/20 the BP had carried out additional stakeholder consultations to confirm the risk mitigation measures which have been described in the Supply Base Report are relevant and appropriate to the scale of the organization. The BP had consulted the risk mitigation process and the content of the Supply Base Report with acknowledged nature protection experts.

4.5 Stakeholder feedback

No stakeholder input received

5 Results

5.1 Main strengths and weaknesses

Strengths: Small number of staff involved in management of the SBP system. The staff has long term experience in FSC CoC/ CW certification, including experience in risk mitigation in the FSC Controlled Wood system. The BP staff had participated in the training for High Conservation Value identification and health and safety training courses with respected Latvian experts. Proactive use of forest habitat expertise in routine work.

Weaknesses: See in the NCR section of the report.

5.2 Rigour of Supply Base Evaluation

SIA Meža birojs is implementing the Supply Base Evaluation process for primary feedstock originating from Latvia and received without SBP-approved Forest Management Scheme claim, SBP-approved Forest Management partial claim, SBP-approved Chain-of-Custody (CoC) System claim. Risk mitigation measures have been elaborated and are being implemented for feedstock originating from forest land (material sourced under FSC Controlled Wood system) as well as non-forest land (arboriculture arisings on overgrown agriculture land, wood growing along the road, rails and other).

The BP is applying the SBP endorsed regional risk assessment for feedstock supply base covering SBE – the Republic of Latvia. Based on the “specified risks” in the risk assessment the organization has suggested several mitigation measures which were consulted with relevant stakeholders prior to implementing. Risk mitigation measures are relevant in addressing risks. It was evaluated at the time of the assessment audit that BP has evaluated options for risk mitigation measures and selected the appropriate and effective risk mitigation measures out of those referenced in the risk assessment. In fact, the most risk mitigation measures outlined in the RRA are used by the BP.

The BP had undertaken implementation of the mitigation measures for individual SBP standard indicators. This mitigation measures were designed in cooperation with external expert - nature/forest habitat experts, and expert on health and safety issues. The stakeholder consultation process has been conducted through notification of stakeholders and distributing the SBR report to stakeholders. Some stakeholders were also contacted directly. The BP is keeping records of communication with stakeholders.

5.3 Collection and communication of data

The BP has implemented a system to collect and record data on Greenhouse Gas emissions. A more detailed review of systems and databases (internal registers and sources of information) to collect and record Greenhouse Gas data were reviewed during the first surveillance audit. The BP also has provided detailed overview of the systems and databases to collect and record Greenhouse Gas data during the audit. All the GHG related information is indicated in the SAR document. All evidence was provided to auditors. In overall, auditors consider it is sufficient to fulfil the requirements of SBP standards, although several weaknesses in the system was identified. See NCRs raised in relation to collection and communication of data (NCR 02/21, NCR 03/21, NCR 04/21).

The SBP and Supply Base Evaluation system is implemented by the organization staff, that have undergone external training and are supervised by the overall responsible person at the organization.

Involved personnel have demonstrated sufficient knowledge in relevant fields (recognition and identification of HCVP, health and safety requirements) during the sites visits. Relevant certificates were available at the time of the assessment audit. Qualification requirements for personnel involved in SBE system are provided in documented procedures of the BP.

In overall, auditors evaluate the competency of main responsible staff to be sufficient for implementing the SBP system with primary material sourced within the SBE. It is based on interviews, review of qualification documents, training records and set of procedures and documents that were composed for the SBP system as well as field observations during the assessment audit. The following key staff members are involved to SBP certification: SBP related staff responsibilities are presented in Section 5. "Responsibilities." of the SBP Procedure. Few staff members are involved into SBP certification: Director and SBP responsible/ Board Member supported by the environmental specialist (maintaining of the management system, staff training, complaint handling, trademark use and all SBP reporting), wood receptionist (wood reception and recordkeeping), accountant and department manager (recordkeeping, sales documents).

6 Review of company's risk assessments

6.1 Overview of company's risk assessments and mitigation measures

The organization has elaborated and is implementing mitigation measures of risks for non-certified feedstock including FSC Controlled Wood and PEFC Controlled Sources originating from Latvia. The organization has designed and is implementing mitigation measures for 3 indicators evaluated as specified risk (2.1.1, 2.1.2 and 2.8.1) according SBP-endorsed RRA for Latvia . The BP is also requiring suppliers to take necessary actions – risk mitigation measures to avoid supplying material of “specified risk”. The same risk mitigation measures are applied to feedstock sourced from both forest and non-forest lands.

Indicator 2.1.1/2.1.2 (HCVF category 1):

According to the SBP endorsed risk assessment for Latvia, HCVF category 1 risks are related to Bird Directive's Annex 1 species (forest birds) whose populations are decreasing in the country. Risk mitigation measures envisages protection of existing bird habitats and protecting the nesting sites. The feedstock shall not be sourced from areas where the bird nesting sites had been destroyed as a result of forestry activities or feedstock sourced without proper forest management activities to preserve nesting sites. The BP staff involved in sourcing of primary feedstock within the SBE had undergone a training course for identification high conservation values in forest ecosystems, recognize HCVs (woodland key habitats, forest habitats of EU importance) and recognize important bird habitats and nesting sites and how these shall be protected.

The BP is using following risk mitigation measures to reduce the risk of threatening HCVF category 1 values: use of forest inventory data, if large-dimension trees with potential bird habitat are located in the area, a field audit is performed; information from the database „Ozols“; during the field audit, confirmation is obtained to make sure that the supplier identifies the bird's nesting sites and conserves them as far as possible. If that a large (above 50 cm) nest has not been preserved or is not planned to be preserved during development, such wood will not be accepted, as well as in case of risk the company refuses to further cooperate with the supplier. The BP is paying attention to preserving large bird nests. During supplier audits a special attention to preservation of large bird nests is paid. The Bp is also considering necessity for training of the primary raw material suppliers for recognizing the important bird areas, large diameter bird nests in particular and evaluating the logging site for presence of large diameter bird nests prior to harvesting. The presence of large diameter nests shall be noted in the WKH checklist.

For all harvesting sites that are evaluated for the presence of Woodland Key Habitats with help of HCV checklist, a presence of large diameter (>50cm) nest or protected bird species is evaluated and noted in the checklist. Interviews with BP staff as well as review of records show that the responsible staff is aware of the procedure. See more details in findings in Appendix B (section 9.1 Mitigation measures)

Audit team revealed gaps in risk mitigation system for HCV category 1. As from ASI incident IN-2776 the organisation had failed to identify a bird nesting place and/or did not use the best available information from other sources. In addition, the organisation has not conducted field risk mitigation measures for feedstock supplies received in Salacgrīva harbour to confirm supplier information on risk mitigation measures. See NCR 05/21

Indicator 2.1.1 (HCVF category 3):

The BP is utilizing a two step approach in assessing risks of indicator 2.1.1. The BP is using the Nature Conservation Agency's database “Ozols” as a primary source of information on High Conservation Value

Forests. The database contains information on existing HCVs, including habitats of EU importance and/or Woodland Key Habitats. Database covers information on HCVs in all private owned forests, but is specifically focused on private forests due to risk designation in the SBP risk assessment. The database also contains the results of EU forest habitat inventory currently being undertaken in the private forests in Latvia. The BP has registered user (expert) level access to the database and has access to results of the inventory. If the information on HCV is not confirmed in the database, the BP shall carry out field verification. The BP has defined the following approach for risk mitigation with regard to identification of high conservation values – within the SBE system all harvesting sites that are not confirmed by the “Ozols” shall be inspected by the supplier of primary feedstock or the BP prior to harvesting and screened for presence of high conservation values using the WKH checklist. The BP is also accepting the supplier evaluation of HCV risks, but the supplier must have undergone training in identification of HCVs – biologically valuable forest habitats and the BP would verify data on a sampling basis. The checklist has been elaborated by forest habitat experts in Latvia and are used by many FSC and SBP certified biomass producers and forest management companies. See more details in findings in Appendix B (section 9.1 Mitigation measures)

During the reporting period the BP had conducted on-site field audits for those areas where the FMU has not been inventoried and evaluated by national EU habitat inventory managed by Nature Conservation Agency.

From review of risk mitigation measures and field audit observations audit team considers the mitigation measures related to HCV category 3 are implemented sufficiently to address the risk identified.

Indicator 2.1.2 (HCVF category 3):

Every source of primary feedstock shall be checked for presence of HCVF by verifying the “Ozols” database. In case the FMU/compartiment is not included in the “Ozols” database, the BP screens the compartment using tool “Latbio”. If tool “Latbio” indicates potential WKH, the site is visited and evaluated with the help of the checklist as potential woodland key habitat or forest habitat of EU importance, it can not be sourced as SBP Compliant feedstock. According to the procedure, the BP in such situation shall inquiry for a certified forest habitat expert advice to evaluate the harvesting site for presence of WKH or forest habitat of EU importance and determine the status the logging site. In case the decision is negative, the site can be harvested and supplied to BP as SBP Compliant feedstock. Feedstock from area of identified HCVs – WKHs/EU habitats (i.e. if the information on HCVF is included in the database “Ozols” or confirmed by expert opinion) is not accepted by the BP.

Field inspections showed that responsible staff demonstrated knowledge on how to identify HCV areas by using HCV checklists. See more details in findings in Appendix B (section 9.1 Mitigation measures)

From review of risk mitigation measures and field audit observations audit team considers the mitigation measures related to HCV category 3 are implemented sufficiently to address the risk identified.

Indicator 2.1.2 (HCVF category 6):

The specified risk for this sub-indicator relates to large diameter noble tree species potentially originating from objects of cultural heritage value, for example, old manors, parks, tree alleys etc. The BP has implemented procurement policy specifying that noble tree species will not be sourced and in case it will be the diameter can't exceed 70cm. The chipping machinery has also maximum diameter restriction of this size. Field inspections showed that responsible staff demonstrated awareness of the requirement. Interviews with the responsible personnel as well as site tour through the storage area show that large sized noble tree species are not being put in the production processes and processed. See more details in findings in Appendix B (section 9.1 Mitigation measures)

From review of risk mitigation measures and field audit observations audit team considers the mitigation measures related to HCV category 6 are implemented sufficiently to address the risk identified.

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Indicator 2.8.1:

Each supplier/contractor shall be checked for H&S compliance by the BP prior to accepting him as a supplier/contractor under the SBE system. The BP uses the dedicated H&S checklist elaborated by the BP in consultation with H&S experts. The checklist is filled in during the supplier audit, via interviews with the workers in the forest. Each supplier/contractor shall be checked before accepting it as a „low risk“ feedstock supplier.

Surveillance/monitoring of suppliers of SBP Compliance feedstock is carried out through sampling, but at least one surveillance audit per calendar year. The supplier audits are conducted by the BP itself using the H&S checklist. The process of supplier verification with regard to H&S compliance has been observed by the CB during the assessment audit. See more details in findings in Appendix B (section 9.1 Mitigation measures)

The supplier audits are conducted by the BP itself. Field inspection records show the BP has sufficient knowledge on H&S requirements as well as good timber harvesting practices. No substantial weaknesses related to the risk mitigation procedure and actual performance in the field have been identified as can be concluded from field inspection records. It is thus concluded from the field inspections, BP is conducting the H&S compliance related risk mitigation measures properly.

Auditors reviewed the organization's risk mitigation system and records related to SBP 2.8.1 (occupational health and safety) risk mitigation. From the information gathered during the audit, it has been revealed that the organisation had not conducted control measures to mitigate Occupational Health and Safety risks for suppliers delivering timber to the Salacgrīva harbour, and logyard suppliers (procurement of roundwood from logyards at forest). Auditors are considering this a major non-conformity because the BP has been accepting timber delivered to Salacgrīva harbour logyard as “low risk” feedstock. See NCR 05/21.

6.2 Specified risk indicators and mitigation measures

Country/Area	Indicator	Specified risk description	Mitigation measure
Latvia	2.1.1 The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation value in the	for specified risk description see Regional Risk Assessment for Latvia	for specified risk description see Regional Risk Assessment for Latvia

	Supply Base are identified and mapped.		
Latvia	2.1.2 The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.	for specified risk description see Regional Risk Assessment for Latvia	for specified risk description see Regional Risk Assessment for Latvia
Latvia	2.8.1 The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).	for specified risk description see Regional Risk Assessment for Latvia	for specified risk description see Regional Risk Assessment for Latvia

7 Non-conformities and observations

NC number NC-001033 (05/21 (61274))		NC Grading: Major	
Standard:		SBP Standard 2: Verification of SBP-compliant Feedstock	
Requirement:		16.1 Where an indicator is rated as specified risk, mitigation measures shall be taken to reduce the risk level to low risk.	
Description of Non-conformance and Related Evidence:			
Two weaknesses related to risk mitigation measures were identified from review of risk mitigation system and records as well as dispute resolution process: • As an outcome of dispute - ASI incident IN-2776 resolution process a minor NCR was issued for SBP standard 2 clause 16.1, related to inefficient risk mitigation measures for identification and protection of RTE bird species and included in the annual audit report of the certificate holder. The organisation had carried out logging works in FMU “Eglīši” (Cadastral No. 42680090006, block 1, compartment 9), a logging site from July 2020, logging conducted shortly prior to SBP certification scope change audit to include SBE in the scope in August, 2020. The dispute resolution team conclusion is that the certificate holder did not implement adequate control measures to mitigate the Specified risk identified by the SBP Regional Risk Assessment for Latvia and Centralized National Risk Assessment of Latvia for category 3.1. NCR raised because control measure for FSC CNRA category 3.1 is identical to SBP risk mitigation measure for HCV category 1: “The control measure includes the identification of RTE bird species by surveying the felling area before the start of logging operations”. The organisation had failed to identify a bird nesting place and/or did not use the best available information from other sources. In addition, the organisation has not conducted field risk mitigation measures for feedstock supplies received in Salacgrīva harbour to confirm supplier information that no bird nesting places were destroyed in logging works; • Auditors reviewed the organization's risk mitigation system and records related to SBP 2.8.1 (occupational health and safety) risk mitigation. Review showed that the organisation had implemented field inspections for its contractors engaged by the organisation in logging works. From the information gathered during the audit, it has been revealed that the organisation had not conducted control measures to mitigate Occupational Health and Safety risks for suppliers delivering timber to the Salacgrīva harbour, and logyard suppliers (procurement of roundwood from logyards at forest). Auditors are considering this a major non-conformity because the BP has been accepting timber delivered to Salacgrīva harbour logyard as “low risk” feedstock. Also, external suppliers of roundwood can be characterized as higher risk in terms of compliance to Occupational Health and Safety requirements rather than contractors/sub-contractors of the organization, who are being monitored on a daily basis by the organisation. Due to the cumulative effects and prevalent major nature of weakness in relation to mitigation of indicator 2.8.1 risks, the grading of the non-conformity is thus considered “major”.			
Timeline for Conformance:		3 months from the report finalisation	
Evidence Provided by Company to close NC:		Pending	
Findings for Evaluation of Evidence:		Pending	
NC Status:		Open	

NC number NC-001034 (06/21 (21675))		NC Grading: Minor
Standard:	SBP Standard 2: Verification of SBP-compliant Feedstock	
Requirement:	6.1 The BP shall record the place of harvesting of inputs classified as SBP-compliant primary feedstock.	
Description of Non-conformance and Related Evidence:		
Auditors verified the information on the origin of wood from felling permits and compared the sourced volume with the volume of purchased wood (per hectare), and found out that in few cases the organisation had purchased more wood from particular FMU than could actually be harvested, i.e. exceeding the average yield of 250m3 per hectare. And no further details justifying the difference were available. From the interview with responsible persons, it appears that the organisation's procedures do not provide for verification of the volume of timber purchased against the area indicated in the felling permit. From this, auditors are drawing conclusion about the weaknesses in the organisation's procedure for verifying the origin of the wood and that the organisation might not have complete information on the origin of the wood supplied. The auditors raised a minor non-conformity NCR 06/21 due to isolated nature of cases.		
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date	
Evidence Provided by Company to close NC:	Pending	
Findings for Evaluation of Evidence:	Pending	
NC Status:	Open	

NC number NC-001035 (01/20)		NC Grading: Minor
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.5	
Requirement:	6.2.2 The BP must inform its CB when a significant change in the operations occurs, resulting in a variation of electricity use or fossil fuel use greater than 25%. Examples may result from a change of production process, a plant refurbishment after an incident, a major change in feedstock used (e.g. use of logs instead of saw mill residues), change of fuel for drying (e.g. fossil fuel instead of biomass) etc. In that case, a new audit shall be required as soon as stable operations have been reached during three (3) consecutive months after the change has occurred.	

Description of Non-conformance and Related Evidence:	
Interview with responsible staff shows the staff is aware of the requirement to inform CB in case of changes in the operations. However, it is not clear how the requirement of the standard shall be implemented (responsibilities, the procedure of monitoring of the energy consumption and reporting process to CB and the SBP) in practice as the BP does not have procedure in place related to implementing the requirements of the standard.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Evidence Provided by Company to close NC: Updated SBP procedure "SBP sertifikācijas sistēmas apraksts" (v.May21)
Findings for Evaluation of Evidence:	During the audit it was identified SBP procedure of the Organization was updated with the p.8.11. According to the procedure the BP will inform CB in significant change in the operations occurs, resulting in a variation of electricity use or fossil fuel use greater than 25%. During the interviews responsible person demonstrated understanding of the requirement.
NC Status:	Closed

NC number NC-001036 (01/20 (47479)) NC Grading: Minor	
Standard:	SBP Standard 2: Verification of SBP-compliant Feedstock
Requirement:	15.3 The BP management system shall document all necessary procedures.
Description of Non-conformance and Related Evidence:	
The BP has established written procedures for SBP requirements. In particular the documented procedure "SBP sertifikācijas sistēmas apraksts." (Description of SBP certification system). The procedure contains description of aims and objectives of the procedure, scope, reference to standards, division of responsibilities, general process description of supply of feedstock, production accounting as well as specific requirements of relevant SBP standards (Supply Base Report, SAR report, mechanism of Green House Gas data collection and calculation, use of SBP logo etc. See documented procedure in Exhibit 1. The procedure "SBP atbilstoša materiāla apstiprināšana, verifikācija, riska mazināšanas process" covers the description of SBE system with respect to risk mitigation measures. The procedure review shows that the main principal components of SBP standard are covered. The procedure, however, contains a number of shortcomings of editorial nature. For example, the structure of the document is not uniform – the description of risk mitigation measures for indicators with specified risk is divided in different parts of the document (see chapters 3., 6.3., 6.4, 10, 11., 12); chapter 6.4. with title "Audits of risk mitigation measures and provisions" contain a scheme for risk mitigation measures for HCV3 category only; the content of p.4.3.14 under p.4.3 "Competence of personnel" does not correspond to content of the chapter; content of chapter 9 does not correspond to the title. Since principal components of SBP standard requirements are covered in the procedure and the personnel is aware of standard requirements a minor NCR 01/20 raised.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date

Evidence Provided by Company to close NC:	The BP has established written procedures for SBP requirements. In particular the documented procedure “SBP sertifikācijas sistēmas apraksts.” (Description of SBP certification system). The procedure contains description of aims and objectives of the procedure, scope, reference to standards, division of responsibilities, general process description of supply of feedstock, production accounting as well as specific requirements of relevant SBP standards (Supply Base Report, SAR report, mechanism of Green House Gas data collection and calculation, use of SBP logo etc. See documented procedure in Exhibit 1. The procedure “SBP atbilstoša materiāla apstiprināšana, verifikācija, riska mazināšanas process” covers the description of SBE system with respect to risk mitigation measures. The procedure review shows that the main principal components of SBP standard are covered. The procedure, however, contains a number of shortcomings of editorial nature. For example, the structure of the document is not uniform – the description of risk mitigation measures for indicators with specified risk is divided in different parts of the document (see chapters 3., 6.3.,6.4, 10, 11., 12); chapter 6.4. with title “Audits of risk mitigation measures and provisions” contain a scheme for risk mitigation measures for HCV3 category only; the content of p.4.3.14 under p.4.3 “Competence of personnel” does not correspond to content of the chapter; content of chapter 9 does not correspond to the title. Since principal components of SBP standard requirements are covered in the procedure and the personnel is aware of standard requirements a minor NCR 01/20 raised.
Findings for Evaluation of Evidence:	The procedure was reviewed during the audit, and the content of the procedure discussed with responsible staff and compared with regular practice of the Organization. It was concluded from review of documented procedure that a number of changes were introduced in the procedure, including addressing the above-mentioned issues and thus the non-conformity is closed.
NC Status:	Closed

NC number NC-001037 (02/20 (47480))		NC Grading: Minor
Standard:	SBP Standard 2: Verification of SBP-compliant Feedstock	
Requirement:	11.1 The risk based approach follows three steps: a) gathering information b) risk assessment and c) management of risk	
Description of Non-conformance and Related Evidence:		
The Biomass Producer had conducted the stakeholder consultation as per requirements of SBP standard 2 and instruction note 2B. According to interview with responsible person and as can be concluded from		

stakeholder consultation records, the BP had sent out the draft of SBR and a call for comments to various stakeholders on April 30, 2020. The BP had not received response from stakeholders. The list of stakeholders reached via e-mail and communication results available in Exhibit 6. According to interviews and records the BP has contacted and communicated only with one certified forest habitat expert. It can be concluded that the organization had not proactively engaged affected stakeholders in its SBE planning process. From this the auditors are drawing a conclusion that the stakeholder consultation process cannot be considered proactive and transparent and appropriate to the scale with regard to engagement with affected stakeholders. Given the importance of engagement with stakeholders in transparent and proactive way in elaborating the SBE system, auditors decided to raise a minor non-conformance NCR 02/20.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Evidence Provided by Company to close NC: Management review, a copy of email communication
Findings for Evaluation of Evidence:	Findings for Evaluation of Evidence: In order to close the non-conformity NCR 02/20, the BP had carried out additional stakeholder consultations before the annual surveillance audit. The BP had consulted the risk mitigation process and the content of the Supply Base Report with several experts: habitat experts, ornithologists, and environmental experts. Documentary evidence were provided at the time of audit.
NC Status:	Closed

NC number NC-001038 (03/20 (47571)) NC Grading: Major	
Standard:	SBP Standard 2: Verification of SBP-compliant Feedstock
Requirement:	IN2C; 4.1 The report shall be concise, covering the most important features, and shall be completed using the latest version of the SBR template for Biomass Producers downloaded from the SBP website.
Description of Non-conformance and Related Evidence:	
Main assessment, the scope expansion audit 2020: the Supply Base Report is prepared using the latest available template of the document. During review of SBR the auditors found some deficiencies in report. For example, the Chapter 2.3.Final harvest sampling programme doesn't contain justified explanation about feedstock volumes used from final felling; although the SVP is not binding to BP the Chapter 4.4 Results of Supplier Verification Programme refers to it; similar in second sentence of Chapter 5 is reference to SVP results; information about stakeholder consultations are not updated according to situation during Scope change audit etc. Due above mentioned shortcomings in SBR a minor NCR 03/20 raised. Annual surveillance audit 2021: During the annual surveillance audit 2021 the following shortcomings in the SBR were identified: a) standard 1 is not mentioned in SBR; 2) Estonian SBP assessment has been added to the report, although the BP is sourcing primary feedstock originating from the Latvia included in its SBP SBE certification scope; 3) Information about a comparison of the scale of harvesting compared to other forest based industries in the region is missing; 4) total supply base are information in section 2.4.a is not accurate; 5) incorrect/ incomplete information is provided in section 2.4. (requiring to describe the harvesting type which best describes how your material is sourced, and indicate	

Was the forest in the Supply Base managed for a purpose other than for energy markets?; 6) reporting period is 11 months; information about 2.4. h. The proportion of biomass composed of or derived from saw logs (%): 34,00 and / or 2.4. Roundwood from final fellings from forests with > 40 yr. rotation times - Average % volume of fellings delivered to BP (%): 34,00; 7) 2.4.m- volume of secondary feedstock volume is missing; 8) accuracy of information in table: Proportion of feedstock sourced per type of claim during the reporting period; 9) section 3, 4.1: secondary feedstock and Estonia in the scope of SBE. Given the repeated occurrence of the non-conformity, the NCR has been upgraded to Major NCR 03/20	
Timeline for Conformance:	3 months from the report finalisation
Evidence Provided by Company to close NC:	Evidence Provided by Company to close NC: Supply Base Report (SBR) of the Organization
Findings for Evaluation of Evidence:	By the time of completing the audit report the BP had updated the Supply Base Report and had corrected the issues mentioned in the description of the non-conformity. Auditors reviewed the updated Supply Base Report and decided to close the non-conformity based on the updated content.
NC Status:	Closed

NC number NC-001039 (01/21 (61269))	
NC Grading: Minor	
Standard:	SBP Standard 2: Verification of SBP-compliant Feedstock
Requirement:	6.2 The BP shall record the place of harvesting and the identity of the primary wood processor responsible for the supply of inputs classified as SBP-compliant secondary feedstock.
Description of Non-conformance and Related Evidence:	
The requirement for origin confirmation, through the supplier evaluation for secondary feedstock is designated in the SBP procedure "SBP sistēmas apraksts" of the BP. According to the procedure supplier declaration needs to be signed and supplier audit confirmation audit needs to be conducted for secondary feedstock suppliers. However during the surveillance evaluation it was identified BP was sourcing small amount of secondary feedstock from the single supplier, however no feedstock origin confirmation evidence was available.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Supplier internal audit record with the signature of supplier representative
Findings for Evaluation of Evidence:	Prior to the audit closing meeting, BP conducted supplier audit and provided internal audit protocol. The document covers information about the SB covering Latvia and Estonia. The audit was conducted at 28.05.2021 and information is up to date. The document is signed by the representative of the supplier and might be considered as supplier declaration.

NC Status:	Closed
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NC number NC-001040 (02/21 (61271))	
NC Grading: Minor	
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.5
Requirement:	3.1.8 Each BP shall record all data as specified in one of the three "SBP Audit Report (SAR) for Energy and Carbon data" templates, where production and transportation of feedstock or biomass contributes to energy or carbon balance during the period of legal ownership by the BP: - BPs producing wood pellets shall complete the "SBP Audit Report (SAR) for Energy and Carbon data for pellets"; - BPs producing only woodchips and energy logs and no other biomass with an SBP Claim shall complete one of the following templates: o "SBP Audit Report (SAR) for Energy and Carbon data for pellets" if both stationary chipping and thermal treatment are carried out on a separate processing site. Any specific reference to pelletisation in the document may be ignored; o "SBP Audit Report (SAR) for Energy and Carbon data for woodchips with stationary chipping" if only stationary chipping is carried out on a separate processing site, with or without phytosanitary treatment (see definition in section 2); or o "SBP Audit Report (SAR) for Energy and Carbon data for woodchips with mobile chipping" if there is no separate processing site with chipping or thermal treatment, other than a standard phytosanitary treatment (see definition in section 2).
Description of Non-conformance and Related Evidence:	
BP prepared 2 separate reports as required by the standard requirements: 1) SBP Audit Report (SAR) for Energy and Carbon data for woodchips with stationary chipping if only stationary chipping is carried out on a separate and 2) SBP Audit Report (SAR) for Energy and Carbon data for woodchips with mobile chipping if there is no separate processing site with chipping or thermal treatment, other than a standard phytosanitary treatment. During the audit it was identified that all types of feedstock have been recorded into both reports and are not divided in between 2 reports as required by the standard.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Evidence Provided by Company to close NC: Updated SAR documents (see Exhibit 2)
Findings for Evaluation of Evidence:	Prior to the report finalization BP provided CB with an updated SAR for stationary chipping and mobile chipping. All feedstock types have been divided in between these reports. SAR documents have been validated and approved.
NC Status:	Closed

NC number NC-001041 (03/21 (61272))		NC Grading: Minor
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.5	
Requirement:	3.2.4 Where energy and carbon data vary for a single Scope End-point (for example, because road is used as an alternative to rail for moving biomass to a single port) then two or more SDIs shall be allocated for that Scope End-point to capture the correct energy and carbon data for the biomass.	
Description of Non-conformance and Related Evidence:		
BP prepared 2 separate reports as required by the standard requirements: 1) SBP Audit Report (SAR) for Energy and Carbon data for woodchips with stationary chipping' if only stationary chipping is carried out on a separate and 2) SBP Audit Report (SAR) for Energy and Carbon data for woodchips with mobile chipping' if there is no separate processing site with chipping or thermal treatment, other than a standard phytosanitary treatment. During the audit it was identified that BP applies SDIs from the previous reporting period, SDIs are the same in both reports (ending with 01 and 02).		
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date	
Evidence Provided by Company to close NC:	Evidence Provided by Company to close NC: Updated SAR documents (see Exhibit 2)	
Findings for Evaluation of Evidence:	Findings for Evaluation of Evidence: Prior to the report finalization BP provided CB with an updated SAR for stationary chipping and mobile chipping processes. SDI information has been updated and sequential SDIs updated. SARs have been validated and approved.	
NC Status:	Closed	

NC number NC-001042 (04/21 (61273))		NC Grading: Major
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.5	
Requirement:	6.2.3 Where a Reporting Period other than 12 months is used the BP shall justify the Reporting Period used in the SAR. Examples of justifications include: a recent commissioning or a significant change as described in 6.2.2. For recently (re-)commissioned plants, engineering values may be used as verifiable evidence and then actual values should be evaluated after start-up when stable operations have been reached for at least three (3) consecutive months.	
Description of Non-conformance and Related Evidence:		

The BP had provided the reporting period for the SAR of 10 months (01.06.2020-31.04.2021). BP also added a comment in the SAR, the period from the last evaluation is taken by the BP. Due to the reason BP is not new or recommissioned facility, the justification and SAR could not be approved. Major NCR 04/21 is issued.	
Timeline for Conformance:	3 months from the report finalisation
Evidence Provided by Company to close NC:	Evidence Provided by Company to close NC: Updated SAR documents (see Exhibit 2)
Findings for Evaluation of Evidence:	Findings for Evaluation of Evidence: Prior to the report finalization the BP provided CB with an updated SAR for stationary chipping and mobile chipping processes. Recordkeeping period in the SAR documents has been updated to 12 months. Both SARs have been validated and approved.
NC Status:	Closed

NC number NC-001043 (07/21 (61270)) NC Grading: Major	
Standard:	SBP Standard 2: Verification of SBP-compliant Feedstock
Requirement:	16.3 The BP shall implement a plan to monitor the effectiveness of the mitigation measures, at least annually (i.e. every 12 months).
Description of Non-conformance and Related Evidence:	
At the time of annual audit plan for monitoring of effectiveness was not available. There was not specific plan available where the criteria and actions with regard to monitoring of effectiveness have been defined either. A major NCR 07/21 raised.	
Timeline for Conformance:	3 months from the report finalisation
Evidence Provided by Company to close NC:	Evidence Provided by Company to close NC: Plan for monitoring of effectiveness of mitigation measures ("Monitoringa plāns gadam SBP sistēmā", Exhibit 7
Findings for Evaluation of Evidence:	Findings for Evaluation of Evidence: After the audit by the time of preparing the audit report the BP had updated documented procedures, and developed a plan for monitoring of effectiveness of SBP SBE system ("Monitoringa plāns gadam SBP sistēmā"). The plan contains monitoring criteria, frequency of data acquisition and collection related to monitoring criteria, data sources and delegation of responsible staff. See Exhibit 7 for details.
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:	31 Jan 2022
Other comments:	N/A