



Preferred by Nature OÜ Evaluation of Cleantek Trade Compliance with the SBP Framework: Public Summary Report

Fourth Surveillance Audit

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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

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:	Preferred by Nature OÜ
Primary CB contact for SBP:	Ondrej Tarabus
Primary CB contact email:	otarabus@preferredbynature.org
Audit team leader:	Pilar Gorria Serrano
Audit team members:	Pilar Gorría
Name of the Company:	Cleantek Trade
Company legal address:	34 r du Général Delestraint, 75016 Paris, France
Company contact for SBP:	Krister Rosenqvist - Packalén
Company contact email:	krister@cleantektrade.com
Company website:	www.cleantektrade.com
SBP Certificate Code:	SBP-07-05
Date of certificate issue:	11 Oct 2018
Date of certificate expiry:	10 Oct 2023
Audit closing meeting date:	28 Sep 2022
Audit cycle:	Fourth 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:	Trader	☐
Approved Standards:	SBP Standard 4: Chain of Custody; SBP Standard 5: Collection and Communication of Data Instruction	☐
Includes Supply Base Evaluation (SBE):	No	☐
Includes communication of Dynamic Batch Sustainability Data (DBSD)	Yes	☐
Includes Group Scheme	No	☐
Products	Chips, Pellets	☐

Feedstock types:	N/A	☐
Feedstock origin (countries):	N/A	☐
SBP-endorsed Regional Risk Assessments used:	Not applicable	☐
Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/		☐
Chain of custody system implemented:	PEFC, FSC: BV-COC-130031 BV/CDC/6330522	☐
	Transfer	☐

2.1 Description of the company

Organisation is a trader without physical possession having legal address in Paris, France. Certificate scope covers purchase of SBP-certified wood chips from different biomass producers. Most of the material is supplied from France (material delivered by the BP to the harbour) and part of the material might be traded from countries such as Spain, Belgium or Netherlands. The organization collect the material in different harbours (Antwerp, Rouen, Gent, Dunkirk and Stetin) and either sell the material directly there or transports it to different points of sale in different countries under different Incoterms delivery conditions. Organization explained that biomass producers are supplying biomass at FAS Incoterms conditions; the biomass then is received in the harbour and either directly sold to customer on CSR in the same harbour or sold FOB at the harbour of the client. Therefore, the biomass is in organisation's ownership during the very limited time. The material is stored in the ports only to accumulate the sufficient amount of chips for the vessel. The material from different suppliers is not mixed and is kept separately. The chips are sold either at the same harbor as delivered by the BP or directly delivered to the customer harbor.

2.2 Detailed description of the Chain of Custody system

Organization implements PEFC physical separation system of claims for biomass trade. PEFC certificate scope covers wood chips purchase and sale with physical possession in different points of sale in different countries under different Incoterms delivery conditions. Possible PEFC input and output claims are 100% PEFC certified or PEFC Controlled sources. The physical separation is implemented at the harbours but the organization does not store certified and non-certified materials at the same time. The stored material has it's buyer already and the certification status are agreed. In case non-certified material would be traded as well, it would go through different harbour or in different time. In situation that certified and non-certified material would be stored in the same harbour (which is not foreseen and could occur in exceptional situation only) such material would be stored in different piles, clearly marked and linked with the supplier providing this material.

3 Specific objective

The specific objective of this evaluation was to confirm that the Biomass Trader'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 Biomass Trader's management procedures;
- Review of FSC and PEFC system control points, analysis of the existing FSC and PEFC CoC system;
- Interviews with responsible staff;
- Review of the records and calculations

4 Evaluation process

4.1 Timing of evaluation activities

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

<i>Audit Schedule</i>			
Activity	Location	Auditor name	Date/time
<i>Opening meeting</i>	Remote	PGS	28 Sep 2021/9:30
<i>Review of documentation</i>	Remote	PGS	28 Sep 2021/10:00
<i>Review of incoming material</i>	Remote	PGS	28 Sep 2021/10:30
<i>Review of sales</i>	Remote	PGS	28 Sep 2021/11:30

<i>Review of energy data</i>	Remote	PGS	28 Sep 2021/12:30
<i>Closing meeting</i>	Remote	PGS	28 Sep 2021/13:00

Auditor qualification		
Auditor name	Role	Qualification
Pilar Gorria	Lead auditor	Forest engineer (Pplitecnic Univ. Of Madrid). Has successfully completed SBP training course and the NEPCon Lead auditor training for FSC/PEFC CoC and FM certification. Has experience from forest certification (FSC / PEFC FM), traceability (FSC / PEFC CoC) and biomass certification (SBP - Sustainable Biomass Program) for more than 10 years.

4.2 Description of evaluation activities

SBP-related documentation was sent to audit team for review prior to desk based audit.

Audit started with an opening meeting attended by Organisation management.

Audit team leader introduced herself, provided information about audit plan, methodology and aim of the evaluation. CB's accreditation, new Standard related issues and confidentiality issues were covered as well.

After that auditor went through all applicable requirements of evaluation standards and instruction documents. During the process, both responsible persons for SBP system were interviewed as well as relevant documents reviewed. The CoC critical control points were evaluated during the audit, including the reception of the purchased material, sales, DTS system management, physical segregation and justification why this is not needed and energy data collection.

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

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4.3 Sampling methodology

The auditor has used full sample when checking the incoming and outgoing volumes as there were very limited invoices.

4.4 CB stakeholder engagement

N/A

4.5 Stakeholder feedback

N/A

5 Results

5.1 Main strengths and weaknesses

Main strengths: Simple and transparent supply chains; PEFC and SBP management systems have been developed and implemented by staff.

Main weaknesses: The organization is considering different trading routes depending on availability of the material and thus the scope of the certificate is quite wide and can not be specific to individual harbours. As a result of that, the management system of the organization needed to be evaluated in broader perspective.

5.2 Rigour of Supply Base Evaluation

N/A

5.3 Collection and communication of data

The organization is only responsible for transport in some very specific cases where the buyer ask to cover the sea transport and deliver the material from the port where chips are accumulated to the port of destination. In such case the organization has a system in place to collect all the required data and present these in form of SREG to the client.

5.4 Competency of involved personnel

The SBP responsible staff has shown good understanding of the requirements in relation to SBP certification and PEFC CoC system

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-001713 (01/22) NC Grading: Minor	
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.5
Requirement:	3.3.2 The characteristics of biomass shall be able to be traced back to the characteristics and quantities of incoming feedstock, taking into account the applicable conversion factors
Description of Non-conformance and Related Evidence:	
One of the transactions made by the CH contains 3151 tn of SBP Compliant Biomass and 2.003 tn of PEFC 100% biomass (not SBP certified). All biomass was physically mixed and therefore it was not possible to trace back to the characteristics of the incoming material. Note: Only 3151 tn of SBP compliant biomass were transferred through the DTS as SBP certified	
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:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	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):	Ondrej Tarabus
Date of decision:	14 Oct 2022
Other comments:	N/A