



Sustainable Biomass Partnership

NEPCon Evaluation of Sibles Progect LLC Compliance with the SBP Framework: Public Summary Report

www.sustainablebiomasspartnership.org



Completed in accordance with the CB Public Summary Report Template Version 1.0

*For further information on the SBP Framework and to view the full set of documentation see
www.sustainablebiomasspartnership.org*

Document history

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1 Overview

CB Name and contact: NEPCon OÜ, Filosoofi 31, 50108 Tartu, Estonia

Primary contact for SBP: Ondrej Tarabus ot@nepcon.org, +420 606 730 382

Report completion date: 27/Jun/2017

Report authors: Nikolai Tochilov, Natalia Zaladinova

Certificate Holder: Sibles Project LLC

Office address: 31A Maerchaka str., Krasnoyarsk 660075, Russia

Production site address: 1B Sovetskaya str., village Verhnepashino, Eniseyskiy district, Krasnoyarsk Krai 663148, Russia

Producer contact for SBP: Director Eduard V. Karpenkov, tel. +7 (391) 274 86 48, Email: karpenkov@vpashino.maltat.ru

Certified Supply Base: Sourcing from Russia, Krasnoyarsk Krai

SBP Certificate Code: SBP-01-86

Date of certificate issue: 18/Sep/2017

Date of certificate expiry: 17/Sep/2022

Indicate where the current audit fits within the certification cycle				
Main (Initial) Audit	First Surveillance Audit	Second Surveillance Audit	Third Surveillance Audit	Fourth Surveillance Audit
☒	☐	☐	☐	☐

2 Scope of the evaluation and SBP certificate

The certificate scope covers the main office in Krasnoyarsk and pellet production site in Verkhnepushino settlement, Eniseskiy district, Krasnoyarsk Krai, Russia.

The BP holds valid FSC Chain of Custody, covering sawmilling and pellet production <http://info.fsc.org/details.php?id=a024000000IPqwwAAD&type=certificate&return=certificate.php>.

Organisation primary production is sawn material. Wood residues from this production are used in secondary production (wood pellets). The feedstock is either FSC 100% certified or non-certified. Origin of the feedstock is Krasnoyarsk Krai of Russia. Point of sale is the Saint Petersburg harbour Noviy Port.

Scope description: Production of wood pellets in Verkhnepushino settlement, Eniseskiy district, Krasnoyarsk Krai, Russia, for use in energy production. Post production end point is Saint Petersburg harbour Noviy Port (train FCA, Incoterms). The scope of the certificate does not include Supply Base Evaluation.

Scope of the evaluation is indicated in the table below:

Scope Item	Check all that apply to the Certificate Scope				Change in Scope (N/A for Assessments)
Approved Standards:	SBP Standard #2 V1.0; SBP Standard #4 V1.0; SBP Standard #5 V1.0 https://sbp-cert.org/documents				☐
Primary Activity:	Pellet producer				☐
Input Material Categories:	☐ SBP-Compliant Primary Feedstock		☒ SBP-Compliant Secondary Feedstock		☐
	☐ Controlled Feedstock		☐ SBP non-Compliant Feedstock		
	☐ SBP-Compliant Tertiary biomass	☐ Post-consumer Tertiary Feedstock			
	☐ SBP-approved Recycled Claim	☐ Post-consumer Tertiary Feedstock			
	☒ FSC	☐ PEFC	☐ SFI	☐ GGL	☐

Chain of custody system implemented:	☒ Transfer	☐ Percentage	☐ Credit	☐
Points of sales	☐ Harbour – Permanent storage (Storage site)	☒ Harbour – Temporally storage (Logistic site)	☐ Other point of sale (e.g. gate of the BP, boarder, railway station etc.)	☐
Provide name of all points of sales	- - -	- Saint Petersburg harbour Noviy Port (train FCA, Incoterms)	- - -	
Use of SBP claim:	☒ Yes		☐ No	☐
SBE Verification Program:	☐ Low risk sources only		☐ Sources with unspecified/ specified risk	☐
	New districts approved for SBP-Compliant inputs:			
Sub-scopes				☐
Specify SBP Product Groups added or removed:				
Comments:				

3 Specific objective

The specific objective of this evaluation was to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification.

The scope of the evaluation covered:

- Review of the BP's management procedures;
- Review of the production processes, production site visit;
- Review of FSC system control points, analysis of the existing FSC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients;
- GHG data collection analysis.

4 SBP Standards utilised

4.1 SBP Standards utilised

Verification of SBP-compliant Feedstock, SBP Standard 2, Version 1.0, March 2015

Chain of Custody, SBP Standard 4, Version 1.0, March 2015

Collection and Communication of Data, SBP Standard 5, Version 1.0, March 2015, accompanied by Instructions 5A, 5B, 5C, Version 1.1 October 2016

Standards and instructions are available at SBP homepage: <https://sbp-cert.org/documents>

4.2 SBP-endorsed Regional Risk Assessment

Not applicable

5 Description of Biomass Producer, Supply Base and Forest Management

5.1 Description of Biomass Producer

BP is a large primary and secondary manufacturer situated in Krasnoyarsk Krai, Russia. Company runs both pellet and sawn material production, which supplies secondary feedstock with FSC 100% claim (or without any certification claim) to the pellet plant. Total annual production capacity of pellet plant is 70000 tonnes.

The round wood used at sawmilling (logs for primary production) is originating from Krasnoyarsk Krai, Russia. Sawmill residues (sawdust and wood chips) are used as a secondary feedstock for pellet production as well as in the dryer.

The BP has implemented FSC transfer system of claims and all amount of produced certified biomass shall be sold with FSC 100% claim (SBP-compliant biomass). Non-certified pellets will be sold without any certification claim.

The pellets will be sold at the territory of Saint Petersburg harbour Noviy Port (Train FCA delivery conditions by Incoterms). Pellets will be transported by trucks from pellet production site to BP's dead-end railway in Lesosibirsk, and by railway from Lesosibirsk to Saint Petersburg harbour.

BP is a recently commissioned plant (April 2016).

5.2 Description of Biomass Producer's Supply Base

Krasnoyarsk Krai is one of the richest in Russia with its natural resources. It has vast areas of highly productive arable lands (3.3 million ha), pastures for cattle (1.3 million ha), land for reindeer herding (35 million ha) and hunting (115 million ha).

The forested area is 85191 thousand hectares, the share of forest land is 35.6% from the total area. Forest raw potential of the Krai is very high; the total timber resources make 11304 million cubic metres, or 15.5% of the country. Coniferous forests are predominant; their share is 84% of the forested area. The most common tree species are larch and pine. Only 15,3% of the established annual allowable cut are currently used in the Krai.

Mature and overmature growing stocks dominate in the total stock of forests. Their share in Krasnoyarsk Krai is 70.6%. Coniferous growing stocks prevail. The most economically valuable species is pine. In Krasnoyarsk Krai it is the primary object of harvesting. Larch wood rates the second as per its economic value.

In accordance with the legislation of the Russian Federation, all forest lands are state-owned. Legal persons use forest lands on a leasehold and short term use basis. Lease relations are a dominant legal form of forest use. The lease period can last from 10 to 49 years.

Supply Base of the Biomass Producer.

The first reporting period of BP is 8 months (01 May - 31 December 2016). It started from the launch of the plant date. BP has four forest management units (FMUs) in long-term concession (for the period of 49 years); a partial

certification of the territory has been conducted by the company. Two FMUs are FSC-certified (Lease Contract No. 11/1-и, Lease Contract No. 11/7-и, certificate number FC-FM/COC-643132); the other two FMUs (lease contracts 11/8-и, 11/9-и) are not certified. As an FSC certificate holder BP takes the responsibility for the observance of FSC basic principles in the field of partial certification according to FSC-POL-20-002 at the FMUs which are not included into the scope of FSC certification. Those FMUs are planned to be certified against PEFC in the future. The SBP-certified wood pellets production covers the use of wood wastes from sawmilling, where the Roundwood originates from FSC-certified FMUs only. The forest management units are located on the territory of Krasnoyarsk Krai among the forest and other leased areas. Places of living of indigenous peoples are located at the same area. The forest management units are located on the territory of Krasnoyarsk Krai and have the following characteristics:

Lease Contract No. 11/1-и, with the total area of 61071 hectares, is located in Krasnoyarsk Krai, Motyginsky District, Motyginsky Forestry. Coniferous growing stocks (mainly larch) with an area of 57275 hectares, or 95,3% of the forested area are predominant on this territory. Softwood growing stocks are located on 2732 hectares (4.5% of the forested area). There are also shrubs, located on 74 ha. The average taxation characteristics: composition 3,1Pine2,8Larch2,6Birch0,7Spruce0,5Aspen,0,1Siberian Pine; age – 125 years; site quality class – 3,5; relative density of the forest stands – 0.62; the average stock of mature and overmature growing stocks on 1 hectare is 213 m3.

Lease Contract No. 11/7-и, with the total area of 187100 hectares, is located in Krasnoyarsk Krai, Evenki district, Baikit forestry. Coniferous growing stocks (mainly larch) with an area of 127629 hectares, or 70.3% of the forested area are predominant on this territory. Softwood growing stocks are located on 7207 ha (4,0 % of the forested area). There are also shrubs, located on 5653 hectares. The average taxation characteristics: composition 5,2Larch2,1Siberian Pine1,6Spruce0,3Fir0,8Birch; age –148 years; site quality class – 3,8; relative density of the forest stands – 0.58; the average stock of mature and overmature growing stocks on 1 hectare is 201 m3.

Thus, the supply base for SBP certified pellets production covers the total area of 248171 ha.

The actual volume of harvested timber was 193542 m3 in 2016. The main method of reforestation at clear cuts is promotion of natural regeneration by viable young growth preservation or soil surface scarification as well as by leaving strips or clumps and single seeding trees at clear cuts. Artificial reforestation, which ensures the regeneration of Siberian larch, the main forest-forming species, by sowing the seeds, is carried out to the least extent. Young forest regeneration is taken care of annually in the course of the first five years of their growth.

In December 2016 BP has passed through the third surveillance audit against the Russian National FSC Standard (FSC-STD-RUS-V 6-1-2012). At the moment, the forest management certificate is suspended due to the identification of a major non-conformity which has not been addressed within established deadline. BP makes every effort to address the major non-conformity in the near future. The BP FSC CoC certificate (FC-COC-643133) is active.

In the course of preparation for the certification BP has completed the evaluation of the impact of the forest management activities on air, water and soil resources, flora and fauna, endangered species of plants and animals, high conservation value forests and representative areas of ecosystems, and social services. BP also made the analysis of a lease regarding applicability of international conventions and bilateral agreements in the field of nature conservation (the CITES Convention, the Convention on biological diversity, the Ramsar Convention, the Convention for the protection of the world cultural and natural heritage, Bilateral agreements on nature protection), justified the long-term sustainability of the planned annual volume of standing timber distribution (yield logging site).

The company allotted high conservation value forests and excluded large intact forest landscapes from timber harvesting. Timber is also not harvested in specially protected areas, water protection areas, representative samples of ecosystems, social high conservation value forests, high conservation value forests of the Angara region. The territory of one of the forest management units leased by BP is inhabited by the indigenous peoples (Evenki):

- “Madra” community of native minorities of the North resides in Krasnoyarsk Krai, Evenki municipal district, Baikit forestry.

- “Kunnoir” community of native minorities of the North resides in Krasnoyarsk Krai, Evenki municipal district, Baikit forestry.

There are no tree species within FMUs that either fall under the CITES Convention or are included in the IUCN red list.

Socio-economic conditions in the areas of leases determine a set of forest sector branches - logging and wood processing industries as well as mining industry. The main objects of transport infrastructure in the district are permanent aerodrome, river piers, and the nearest railway station.

The company's activity influences the following socio-economic conditions: payments to local and regional budget, transport infrastructure support, social infrastructure support, provision of social facilities and local population with firewood, provision of jobs, welfare assistance and provision of transport.

All roundwood (sawlogs) is supplied to the plant for timber processing. The pellets are not produced from primary feedstock. They are produced from residues of wood processing. Processing of certified and non-certified wood is separated in time. Accordingly, the SBP product groups in the First reporting period were as follows:

SBP product group	Percentage in total deliveries within the reported period	Number of suppliers	Species composition
controlled feedstock	%	-	
SBP-compliant primary feedstock	%	-	-
SBP-compliant secondary feedstock	100 %	Own feedstock of Sibles Projekt	Scotch pine 53% Siberian larch 38% Siberian spruce, Fir 9%
SBP-compliant tertiary feedstock	%	-	-
SBP-non-compliant feedstock	%	-	-

Please see more description of the Supply Base in BP's supply base report available in Internet:

<http://maltatwood.com/upload/iblock/9bd/9bd94b116743f44673ba84dd959af9f1.pdf>

<http://maltatwood.com/upload/iblock/86a/86ab2120ccc53f43d3a1b630ce530bf5.PDF>

5.3 Detailed description of Supply Base

Total Supply Base area (ha):	248171 ha
Tenure by type (ha):	public 248171 ha
Forest by type (ha):	boreal 248171 ha
Forest by management type (ha):	managed natural 248171 ha
Certified forest by scheme (ha):	248171 ha FSC-certified forest

Quantitative description of the Supply Base can be found in the Biomass Producer's Supply Base Report.

5.4 Chain of Custody system

BP holds valid FSC CoC certificate

<http://info.fsc.org/details.php?id=a024000000IPqwwAAD&type=certificate&return=certificate.php>, using FSC transfer system of claims. Incoming secondary feedstock originates from Organisation's own sawmill located at the same production site, and has either FSC 100% claim or no any certification claim (non-certified material).

Non-certified material is handled separately from certified material at all stages.

6 Evaluation process

6.1 Timing of evaluation activities

Onsite assessment was conducted on March 30-31, 2017 (11,5 h). Assessment activities included documents review at office, inspection of production facilities and staff interviews.

Activity	Location	Date/time
Opening meeting*	Office at Krasnoyarsk, both auditors	30/03/2017 09.30-09.50
Documents and procedures review. Inputs review, energy use calculations review,	Office at Krasnoyarsk, both auditors	30/03/2017 09:50-17.45
Presentation of the results of the first day of assessment	Office at Krasnoyarsk, both auditors	30/03/2017 17:45-18.00
Chain of custody review (site tour); interview with the chief of pellet production and other relevant staff	Pellet production site at Vekrhnepushino settlement BP's dead-end railway in Lesosibirsk Both auditors	31/03/2017 09:00 – 12:00
Closing meeting*	Office at Krasnoyarsk, both auditors	31/03/2017 15:45 – 16:00
End of the evaluation		31/03/2017 16:00

6.2 Description of evaluation activities

Composition of audit team:

Auditor(s), roles	Qualifications
Nikolai Tochilov	NEPCon SBP lead auditor. He has successfully passed SBP auditor training in Tallinn in January 2015; previous experience with more than 15 SBP assessments and annual audits in Russia.
Natalia Zaladinova	SBP lead auditor in training. NEPCon FSC FM/COC and FSC CoC lead auditor. She has passed the SBP lead auditor training in December 2016 (Amsterdam, Netherlands). During the last year she participated in more than 15 SBP assessments and annual audits in Russia.

The assessment visit was focused on management system evaluation: division of the responsibilities, document and system, input material classification (reception and registration), analysis of the existing FSC system and FSC system control points as well as GHG data availability.

Description of the assessment evaluation:

All SBP related documentation connected to the SBP as well as FSC CoC system of the organisation, including SBP Procedure, SAR, SBP Profiling data and Supply Base Report and FSC system description was provided by the company at the beginning of the assessment. Audit started with an opening meeting attended by the SBP responsible person and the management of the organization.

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

After that auditor went through all applicable requirements of the SBP standards nr.2, 4, 5 and instruction documents 5a, 5b, 5c 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 and controlled biomass. During the process overall responsible person for SBP system and other staff were interviewed.

After a roundtrip around BP's pellet production was undertaken at Verknhepashino settlement. During the site tour, reception process was observed, applicable records were reviewed, staff was interviewed and FSC system critical control points were analysed. Furthermore, the dead-end railway at Lesosibirsk was inspected, where big bags with pellets are temporarily stored before shipping to customer by railway.

At the end of the audit findings were summarised and audit conclusions based on use of 3 angle evaluation method were provided to the management and SBP responsible person.

Impartiality commitment: NEPCon commits to using impartial auditors and our clients are encouraged to inform NEPCon management if violations of this are noted. Please see our Impartiality Policy here: <http://www.nepcon.org/impartiality-policy>

6.3 Process for consultation with stakeholders

The stakeholder consultation was carried out on January 6, 2017 by sending direct email to different stakeholder categories. The announcement was also published at NEPCon homepage at the same date.

No comments from the stakeholders were received.

7 Results

7.1 Main strengths and weaknesses

Strength: Use of the FSC transfer system. Effective recordkeeping system. Clearly designated responsibilities within the staff members.

Weaknesses: See minor NCRs below in this report.

7.2 Rigour of Supply Base Evaluation

Not applicable.

7.3 Compilation of data on Greenhouse Gas emissions

The BP has involved external consultant who helped with implementation of the system for collection of the emission and energy data. Energy use data are based on actual production results, as well as engineering calculations.

7.4 Competency of involved personnel

The SBP responsible person was supported by external consultant who was closely involved in preparation of internal procedures and helping to set up the management system. The SBP responsible staff has shown good understanding of the requirements in relation to SBP certification and of the FSC CoC system.

7.5 Stakeholder feedback

No feedback from stakeholders have been received.

7.6 Preconditions

None

8 Review of Biomass Producer's Risk Assessments

Not applicable.

9 Review of Biomass Producer's mitigation measures

Not applicable.

10 Non-conformities and observations

NCR: 01/17	NC Classification: minor / незначительное
Standard & Requirement:	SBP Standard # 2 requirement 2C 4.1
Description of Non-conformance and Related Evidence:	
The Supply Base Report is concise and contains almost all information required by SBP. The website address http://sibles.maltat.ru/ specified in the report in section 1 and 11.2 is not available – Supply Base Report is published at other website. BP's name in English is specified in a different way in different documents: Sibles Project Ltd in SBP Trademark License Agreement; Sibles Projekt Ltd in Supply Base Report and Sibles Proekt in FSC database http://info.fsc.org/details.php?id=a024000000IPqvvAAD&type=certificate. Отчет о ресурсной базе полный и содержит почти всю информацию, требуемую SBP. Адрес веб-сайта http://sibles.maltat.ru/, указанный в разделах 1 и 11.2 Отчета, недоступен. Отчет о ресурсной базе опубликован на другом вебсайте. Наименование компании на английском языке указано в разных вариантах в различной документации - Sibles Project Ltd в Лицензионном соглашении с SBP; Sibles Projekt Ltd в Отчете о ресурсной базе и Sibles Proekt публичной базе данных сертификатов FSC http://info.fsc.org/details.php?id=a024000000IPqvvAAD&type=certificate.	
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	By the next annual surveillance audit, but not later than 12 months from report finalisation date / К следующему ежегодному аудиту, но не позднее 12 месяцев с момента финализации отчета
Evidence Provided by Organisation:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN / ОТКРЫТО

NCR: 02/17	NC Classification: minor / незначительное
Standard & Requirement:	SBP Standard # 4 requirement 6.1.4
Description of Non-conformance and Related Evidence:	
BP submitted the document from the State Tax Service (#9716 dated of 24/04/2017), according to which, BP has debts on payment of some of the applicable taxes, fees and duties. Организация предоставила справку из налоговой службы (№9716 от 24.04.2017), согласно которой у нее имеются задолженности по некоторым применимым налогам и сборам .	
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the

	root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	By the next annual surveillance audit, but not later than 12 months from report finalisation date / К следующему ежегодному аудиту, но не позднее 12 месяцев с момента финализации отчета
Evidence Provided by Organisation:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN / ОТКРЫТО

NCR: 03/17	NC Classification: minor / незначительное
Standard & Requirement:	SBP Standard # 4 requirement 6.3.1
Description of Non-conformance and Related Evidence:	
According to national legal Health and Safety requirements, BP has to pass special attestation of the working places, where the quality of working conditions is evaluated. At the moment of this SBP evaluation, attestation of the working places has not been yet completed. Согласно действующему трудовому законодательству, Организация должна провести Специальную Оценку Условий Труда (СОУТ). На момент основной оценки SBP, СОУТ не проведена.	
Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	By the next annual surveillance audit, but not later than 12 months from report finalisation date / К следующему ежегодному аудиту, но не позднее 12 месяцев с момента финализации отчета
Evidence Provided by Organisation:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN / ОТКРЫТО

Please list of the non-conformities which are likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?

NONE

11 Certification decision

Based on Organisation's conformance with SBP requirements, the auditor makes the following recommendation:	
☒	Certification approved: Upon acceptance of NCR(s) issued above
☐	Certification not approved:
Based on auditor's recommendation and NEPCon quality review following certification decision is taken:	
NEPCon certification decision: The Biomass Producer has been certified by NEPCon as meeting the requirements of the specified SBP Standard, the certificate can be issued immediately after NEPCon will obtain the approval from SBP technical committee. The expiration of the certificate will be then 5 years.	
Certification decision by: Ondřej Tarabus	
Date of decision: 27/06/2017	
Next surveillance audit should take place:	☒ within 12 months ☐ more frequently (please specify)

12 Surveillance updates

12.1 Evaluation details

Not applicable.

12.2 Significant changes

Not applicable.

12.3 Follow-up on outstanding non-conformities

Not applicable.

12.4 New non-conformities

Not applicable.

12.5 Stakeholder feedback

Not applicable.

12.6 Conditions for continuing certification

Not applicable.

12.7 Certification recommendation

Not applicable.

13 Evaluation details

Primary Responsible Person: (Responsible for control system at site(s))	Nadezhda Dombrovskaya, forest certification engineer
Auditor(s):	Nikolai Tochilov, Natalia Zaladinova
People Interviewed, Titles:	Nadezhda Dombrovskaya, forest certification engineer Evgeniy Danchenko, deputy director Natalia Petrova, chief accountant Elena Surovets, accountant Dmitry Zarembo, deputy head of forest department Alexander Zharov, deputy head legal department Nina Vasileva, safety engineer Tatyana Farsonova, director for production Damir Galimov, chief power engineer Svetlana Ulyanova, chief controller Vladimir Zhuravlev, production director Marina Shalygina, dispatcher Oleg Nikiforov, deputy director of wood supply Zinaida Senkova, chief foreman
Brief Overview of Audit Process for this Location:	Please see section 6.2 of the report above
Comments:	-