

NEPCon Evaluation of Vyborg Forestry Development Corporation Compliance with the SBP Framework: Public Summary Report

First Surveillance Audit

www.sbp-cert.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.sbp-cert.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.net, +420 606 730 382

Report completion date: 01/Dec/2017

Report authors: Nikolai Tochilov

Certificate Holder: Vyborg Forestry Development Corporation
Russia 188918, Leningrad region, Vyborg district, Sovetskiy set., Zavodskaya st.2

Producer contact for SBP: Tatiana Kolosovskaya, certification manager; mob.: +7 921 978-56-81; email: kolosovskaya@vlk.ru

Certified Supply Base: Sourcing from Russia, Leningrad, Vologda, Pskov, Novgorod, Tver, Ryazan regions and Karelia Republic

SBP Certificate Code: SBP-01-55

Date of certificate issue: 21/Dec/2016

Date of certificate expiry: 20/Dec/2021

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 production site and office in Sovetskiy settlement, Vyborg district of Leningrad region, Russia.

The BP holds valid FSC Chain of Custody, covering pellet production

<http://info.fsc.org/details.php?id=a024000000GoUw5AAF&type=certificate&return=certificate.php>.

The input material used by BP for biomass production contains only primary feedstock supplied by local FSC certified suppliers with FSC 100% claim. Secondary feedstock is not used.

BP also implements FSC controlled material verification system, and purchases Roundwood which after delivery is classified as FSC Controlled Wood – this wood material is not included into SBP certificate. BP ensures physically separate handling with the wood material FSC 100% and wood material FSC Controlled Wood.

Scope description: Production of wood pellets in Sovetskiy settlement, Leningrad region, Russia, for use in energy production. Post production end point is Vyborg (vessel FOB) or Sovetskiy (truck FCA). 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/				☐
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	- - -	FOB Vyborg harbour, vessel	FCA Sovetskiy, truck	
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

Instruction documents 5A, 5B, 5C, version 1.1, October 2016.

<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 holds valid FSC COC certificate and produces both paper products (linerboard) and wood pellets.

Wood pellets are produced of low-quality roundwood (pine, birch, aspen, spruce and alder) which is purchased in European Russia (seven regions) and delivered to the site by track and train. Some share of the delivered roundwood is FSC 100%, whereas the rest supplies are non-certified and included into company's own program of verification of controlled material suppliers.

BP implements transfer system of FSC claims and ensures physically separate handling of FSC 100% and FSC Controlled Wood feedstock. FSC Controlled Wood feedstock is not included into certificate scope.

Delivered roundwood is measured at check-point, and measurement data is entered into BP's database.

Wood pellets are loaded to containers and delivered to neighbouring sea harbour by trucks. Delivery conditions: FOB Vyborg and FCA Sovetskiy (Incoterms 2010).

5.2 Description of Biomass Producer's Supply Base

Please note:

Since the assessment in 2016, the Supply Base Report was updated with the information about Supply Base of controlled material primary feedstock (for FSC Controlled Wood pellet production). However, prior to this annual audit BP has taken a decision to suspend scope expansion of SBP certificate until they successfully pass evaluation against FSC-STD-40-005 (3-1). Nevertheless, NEPCon audit team considers acceptable, that CW supplies are taken into account in Supply Base Report.

The supply base of wood feedstock is located in the North-West and Central Federal Districts of the Russian Federation on the territory of 7 subjects of the federation.

The total area of forest lands of the Russian Federation territory is 764 million ha, which is approximately 21% of the world's forest stock. Coniferous species account for 68.4%, hardwoods - 2.4%, softwood - 19.3%. Other wood species accounts less than 1% of forests.

In accordance with the legislation of the Russian Federation, all lands of the forest fund are in state ownership. Legal entities receive forest plots in use on the lease terms and short-term use. Lease relations are the dominant way of using forests. The lease term can be from 10 to 49 years.

The signing of lease contracts for forest areas or contracts for the purchase and sale of forest is carried out at auctions for the sale of these rights for contract. Sites leased must necessarily pass state cadastral registration. Each forest user who received a forest plot for lease in accordance with the Forest Code of the Russian Federation is obliged:

- implement measures to guard, protect and reproduce forests,
- annually provide a forest declaration,
- develop a forests management project,
- provide a report on the use of forests, their protection, preservation and reproduction.

Ensuring high-quality reproduction of forest resources and protective afforestation is a prerequisite for the use of forests. All reforestation works on forest sites leased out are planned and carried out by forest users on their own expenses in accordance with the forest management projects.

The forestry complex of the Russian Federation, which includes forestry and timber industry in timber harvesting and processing, occupies an important place in the country's economy. In the forestry complex of the Russian Federation, about 60 000 large, medium and small enterprises are employed in all regions of the country. The total number of employees in the forestry complex is about 1 million people. North-West of Russia is the leader in the level of development of sawmills, woodworking, pulp and paper industries.

The practice of forest management in Russia is based on the achievement of sustainable forest management in accordance with the requirements of forest legislation, and, if applicable, the principles of forest certification. The rotation period is 60-120 years. During the rotation period, thinnings and clear cuttings in the stage of maturity are carried out and reforestation is ensured. Planting of seedlings or natural regeneration can be used for reforestation. The practice of continuous forest management is also used. Continuous forest harvesting is based on a 15-20-year cycle of logging with selective harvesting and retention of a viable undergrowth.

Forest certification is an effective tool to counter illegal logging and illegal wood trade. In Russia, the Forest Stewardship Council (FSC) is widely used. The area of certified forests in Russia is more than 43 million hectares, or 30% of the total number of forests that are on lease. The dynamics of the forest certification development in the Russian Federation points to the ever-growing activity of timber companies, which indicates a responsible approach to ensure the legality of harvested wood and compliance with environmental and other requirements.

The supply base of Biomass Producer.

The supply base is the total area of the forest fund of the Leningrad, Vologda, Pskov, Novgorod, Tver, Ryazan regions and the Republic of Karelia. The total area of the supply base is 44305.7 thousand hectares.

The supply base is located in the northern, middle and southern taiga of northwestern Russia and the zone of mixed and deciduous forests of the central strip.

The region of the supply base is mainly located within the North-West region of Russia and is characterized by a rather developed transport infrastructure in comparison with many other regions of Russia. The development of the region is favorably affected by the proximity of ports, state borders and the second largest city in Russia - St. Petersburg. In the region, not only the timber industry is well developed, but also other: food and light industry, machine building, shipbuilding, energy complex.

The largest part of the supply base is made up of coniferous forests (spruce, pine) with an admixture of hardwoods (aspen, birch). Only in the Ryazan region there are broadleaf forests of the temperate zone. Within the supply base,

only the *Betula pendula* var. *Carelica* of CITES or IUCN tree species is found, but BP does not purchase this type of wood.

Despite the fact that BP is the world's largest pellet producer in the world, the scale of its consumption of wood is very low. Much more powerful consumers of wood in the region are pulp and paper mills. BP uses mainly low-grade roundwood, which is not suitable for other industries.

BP is located on the shore of the Finnish Gulf in the settlement Sovietskiy and has a great socio-economic importance in the region. This is a city-forming enterprise that provides jobs for the local population. BP delivers water, heating and electricity to the settlement, works closely with the administration of the village to solve social problems.

To date, BP purchases SBP-compliant primary feedstock from 14 suppliers, SBP-compliant tertiary feedstock - from one supplier and Controlled Feedstock - from 15 suppliers from 55 chains.

In the reporting period, BP purchased SBP-compliant primary feedstock from 13 suppliers (34% in production volume) and Controlled Feedstock from 31 suppliers (66% in production volume). Controlled Feedstock is not covered by this SBP certification.

Tree species used in pellet production:

Populus tremula - Aspen;
Pinus sylvestris – Scots pine;
Betula pendula – Silver birch;
Alnus incana – Grey alder;
Alnus glutinosa – European alder;
Picea abies – Norway spruce

More details about BP's supply base can be found in Supply Base Report:

<http://vfdc.ru/ru/materials/1>

5.3 Detailed description of Supply Base

Total Supply Base area (ha):	44 305 700 ha
Tenure by type (ha):	44 305 700 ha state owned
Forest by type (ha):	43 217 300 ha - boreal; 1 088 400 ha – temperate
Forest by management type (ha):	44 305 700 ha managed natural
Certified forest by scheme (ha):	11 492 370 ha FSC-certified forest

5.4 Chain of Custody system

BP holds valid FSC CoC certificate

<http://info.fsc.org/details.php?id=a024000000GoUw5AAF&type=certificate&return=certificate.php>, using FSC transfer system of claims. Incoming wood may have the claims FSC 100% and FSC Controlled Wood (wood

material included into BP's own program of verification of controlled material suppliers against Annex 3 of FSC-STD-40-005). BP ensures that FSC 100% and FSC Controlled Wood materials are stored and handled separately from each other – for this purposes BP uses batch system of pellet production. Before switching from production of FSC Controlled Wood pellets to FSC 100% pellets, all production line is cleaned from wood wastes. FSC Controlled Wood pellet production is not included into SBP certificate scope.

6 Evaluation process

6.1 Timing of evaluation activities

Onsite audit was conducted on September 04-05, 2017 (14 h). Audit activities included documents review at office, inspection of production facilities and staff interviews.

Activity	Location	Date/time
Opening meeting*	Office	04/09/2017 09.00-09.15
Documents and procedures review. Inputs review, energy use calculations review	Office	04/09/2017 10:15-13.00
Lunch		04/09/2017 13:00-14:00
Documents and procedures review. Inputs review, energy use calculations review	Office	04/09/2017 14:00-17.00
Chain of custody review (site tour); staff interview	Pellet production site	05/09/2017 09.00-11.30
Documents and procedures review, staff interview	Office	05/09/2017 11:30-13.00
Lunch		05/09/2017 13:00-14:00
Documents and procedures review, staff interview	Office	05/09/2017 14:00-16.40
Closing meeting*	Office	05/09/2017 16.40-17.00

End of the evaluation		05/09/2017
		17.00

6.2 Description of evaluation activities

Composition of audit team:

Auditor(s), roles	Qualifications
Nikolai Tochilov, lead auditor	NEPCon SBP lead auditor. He passed SBP auditor training in Tallinn in January 2015; previous experience with more than 20 SBP pre-assessments, 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 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 audit. Audit started with an opening meeting attended by the SBP responsible person and the management of the organization.

Auditor introduced himself and provided information about audit plan, methodology, auditors 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. During the site tour, reception process was observed, applicable records were reviewed, staff was interviewed and FSC system critical control points were analysed.

At the end of the audit finding were summarised and audit conclusion 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

No stakeholder consultations conducted for this annual audit.

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 non-conformity reports 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.

7.4 Competency of involved personnel

The SBP responsible person was supported by external consultant who was closely involved in helping to set up and maintain 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. The following positions of the staff are mainly involved into the SBP system management: SBP certification responsible), chief of pellet production, H&S specialist, leading manager of sales department, experts of wood procurement department.

7.5 Stakeholder feedback

No stakeholder comments 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 #4, requirement 6.1.4 SBP certificate holders shall comply with all trade and customs requirements including payment of any fees and duties.
Description of Non-conformance and Related Evidence:	
According to the latest documented confirmation from State Tax Service (#114859, dated of 27/11/2017) BP has debts on payment of taxes. BP staff explained that in 2017 there are no debts, and all taxes are paid in time. Debts shown in the document from the State Tax Service occurred several years ago, BP disagreed with these debts and initiated proceedings Arbitration Tribunal of S.Petersburg and Leningrad region. BP could not provide auditor any more information. Согласно самой свежей справке «О состоянии расчетов по налогам..» №114859 от 27.11.2017 ИФНС России по Выборгскому Району Ленинградской области, Организация имеет задолженность по налогам. Сотрудники Организации пояснили, что в 2017 году задолженности отсутствуют, и все налоги выплачиваются вовремя. Задолженности, показанные в справке, возникли несколько лет назад. Организация не согласилась с ними и инициировала разбирательства в Арбитражном суде Санкт-Петербурга и Ленинградской области. Никакой дополнительной информации аудитору предоставлено не было.	
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 / До следующего ежегодного аудита
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 #2, requirement 2C, 4.1 The report shall be <i>concise, covering the most important features</i> , and shall be completed using the latest versions of the SBR Template for Biomass Producers downloaded from the SBP website.
Description of Non-conformance and Related Evidence:	
Supply Base Report includes description of tree species used in pellet production: <i>Populus tremula</i>, <i>Pinus sylvestris</i>, <i>Betula pendula</i>, <i>Alnus incana</i>, <i>Alnus glutinosa</i>, <i>Picea abies</i>. At the same time list of species used in pellet production included into BP's FSC CoC certificate scope https://info.fsc.org/details.php?id=a024000000GoUw5AAF&type=certificate is different: <i>Populus spp.</i>, <i>Pinus sylvestris</i>, <i>Betula pendula</i>, <i>Picea abies</i>. SBP responsible person explained that they applied to	

certification body with request to update list of tree species in public database of FSC certificate holders.

Отчет о ресурсной базе включает в себя перечень древесных пород, используемых в пеллетном производстве: *Populus tremula*, *Pinus sylvestris*, *Betula pendula*, *Alnus incana*, *Alnus glutinosa*, *Picea abies*. В то же самое время, перечень древесных пород, используемых в пеллетом производстве и включенных в область действия сертификата цепи поставки FSC Организации <https://info.fsc.org/details.php?id=a024000000GoUw5AAF&type=certificate> имеет отличия: *Populus spp.*, *Pinus sylvestris*, *Betula pendula*, *Picea abies*. Сотрудник, ответственный за сертификацию SBP пояснил, что Организация направила в орган сертификации запрос об обновлении перечня древесных пород в публичной базе данных держателей сертификатов FSC.

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 / До следующего ежегодного аудита
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

Observations:

OBS: 01/17	Standard & Requirement:	SBP Standard # 2 requirement 19.3
	Report Section	Appendix A, p. 12.3
Description of findings leading to observation:	The updated Supply Base Report has been published at BP's homepage. External peer review has not been conducted. Обновленный отчет о ресурсной базе был размещен на веб-сайте Организации. Внешнее рецензирование отчета не проводилось.	
Observation:	Prior to finalisation, the draft SBR should be peer reviewed by an independent and competent party. До финализации отчета о ресурсной базе его рекомендуется передавать на рецензирование независимой и компетентной третьей стороне.	

OBS: 02/17	Standard & Requirement:	SBP Standard # 2 requirement 15.2
	Report Section	Appendix A, p. 3.2
Description of findings leading to observation:	Although no non-compliances identified in systems and procedures during this audit, NEPCon auditor considers that SBP responsible person is quite overloaded and will be much more overloaded as soon as FSC Controlled Wood pellets will be included into SBP certificate scope. At the moment of this annual audit BP decided to postpone inclusion of FSC Controlled Wood pellets into SBP certificate scope. Хотя в ходе аудита не было выявлено несоответствий в системах и процедурах Организации, аудитор считает, что сотрудник, ответственный за SBP сертификацию, перегружен, и будет еще более перегружен после того, как в область действия сертификата SBP будет включено производство пеллет с заявлением FSC Controlled Wood. На момент настоящего ежегодного аудита Организация отложила включение производства пеллет с заявлением FSC Controlled Wood в область действия сертификата.	
Observation:	Number of staff responsible for maintaining of the procedures and systems within SBP certification should be appropriate to the type, range and volume of work performed. Организации рекомендуется обеспечить количество сотрудников, достаточное для поддержания процедур и систем в рамках SBP сертификации, с учетом типа, масштаба и объемов выполняемой работы.	

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 certificate can be maintained.	
Certification decision by: Oļesja Puišo	
Date of decision: 01.12.2017	
Next surveillance audit should take place:	☒ within 12 months ☐ more frequently (please specify)

12 Surveillance updates

12.1 Evaluation details

Please see sections 6.1 and 6.2 above in this report.

12.2 Significant changes

The supply base has been significantly expanded compared to the previous reporting period due to the potential inclusion of Controlled Feedstock in the scope of the SBP certificate. At present, the supply base includes 7 regions of Russia. However, during this audit BP cancelled inclusion of Controlled Feedstock to the scope of this certificate.

12.3 Follow-up on outstanding non-conformities

NCR: 01/16	NC Classification: minor
Standard & Requirement:	SBP Instruction #5a requirement 3.3.1
Description of Non-conformance and Related Evidence:	
BP has three suppliers of round wood with FSC 100% claim. BP applied to them with request to submit information on fuel consumption for timber harvesting and extraction, as well as for soil preparation and planting. One supplier gave information that diesel consumption for soil preparation, planting and timber harvesting is 3 litres/tonne feedstock; second supplier reported 2 litres/tonne feedstock and the rest supplier did not submit information. BP accepted average diesel consumption for forest operations as 3 litres/tonne feedstock. Auditor would agree with such approach, however suppliers did not submit any calculations or other more detailed evidence of their diesel consumption for forest operations. У организации три поставщика круглого леса с заявлением FSC 100%. Им был направлен запрос с просьбой предоставить информацию о затратах топлива при заготовке и трелевке древесины, а также при подготовке почвы и посадке лесных культур. Один из поставщиков сообщил, что расход дизельного топлива на этих операциях составляет 3 литра на тонну сырья; другой – 2 литра на тонну сырья; третий информацию не предоставил. Организация приняла средний расход дизельного топлива на этих операциях 3 литра на тонну сырья. Аудитор согласился бы с таким результатом, однако поставщики не представили никаких расчетов или более детальных подтверждений расхода дизельного топлива на этих операциях.	
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 surveillance audit
Evidence Provided by Organisation:	ID 5B section 5.3

Findings for Evaluation of Evidence:	Tier 1 default values from Biograce used by BP in SAR.	
NCR Status:	CLOSED	
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	Yes ☐	No ☒

NCR: 02/16	NC Classification: minor	
Standard & Requirement:	SBP Instruction #5a requirement 4.9.1	
Description of Non-conformance and Related Evidence:		
BP measures the natural gas consumption in normal cubic meters. To meet the SBP requirements, the figure then was converted by BP into kWh. It is unclear if the final result of natural gas consumption is given in terms of Lower Heating Value. Организация измеряет расход природного газа в нормальных кубических метрах. Для соблюдения требований SBP эта величина затем была сконвертирована в кВтч. Неясно, представлен ли финальный результат расхода природного газа с учетом нижней теплотворной способности.		
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 surveillance audit	
Evidence Provided by Organisation:	Gas Quality Passports from gas supplier	
Findings for Evaluation of Evidence:	Every month gas supplier along with invoice submits 'Gas Quality Passport' where natural gas LHV is specified in MJ/standard m3. BP used these values for calculations of natural gas consumption in SAR.	
NCR Status:	CLOSED	
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?		Yes ☐ No ☒

NCR: 03/16	NC Classification: minor
Standard & Requirement:	SBP Instruction #5a requirement 5.1.2
Description of Non-conformance and Related Evidence:	
Average diesel consumption for pellet transportation to Vyborg sea port was reported as 0,57 l/t biomass (or 42500 MJ/t biomass). BP has got this information during communication with contractors, however there is no any documented evidence which could confirm diesel consumption calculations, except communication protocol, performed by BP. Средний расход дизельного топлива для доставки пеллет в порт Выборг оценивается в 0,57 л/т пеллет (или 42500 МДж/т пеллет). Организация получила эту информацию от своих подрядчиков. Однако отсутствуют какие-либо документальные подтверждения того, как этот расход был рассчитан, кроме протокола сбора данных, подготовленного самой организацией.	
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 surveillance audit
Evidence Provided by Organisation:	ID 5B section 6.1.8
Findings for Evaluation of Evidence:	BP does not specify in SAR diesel consumption by trucks for biomass delivery to Vyborg harbour and expects that consumer/customer will use reference values from ID 5B (Biograce).
NCR Status:	CLOSED
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	Yes ☐ No ☒

12.4 New non-conformities

Please see section 10 above in this report.

12.5 Stakeholder feedback

No comments or concerns have been raised by stakeholders and received by NEPCon about the Biomass Producer since the previous evaluation.

12.6 Conditions for continuing certification

Biomass Producer is required to address all identified minor non-conformities within established deadlines.

12.7 Certification recommendation

It is recommended to maintain the SBP certification for the Biomass Producer.

13 Evaluation details

Primary Responsible Person: (Responsible for control system at site(s))	Tatiana Kolosovskaya, certification responsible
Auditor(s):	Nikolai Tochilov
People Interviewed, Titles:	Tatiana Kolosovskaya, certification responsible Larisa Aleksandrova, commercial director Sergey Chevychelov, H&S engineer Tatiana Solovyeva, controller of wood procurement department Timur Fatkullin, personnel of wood procurement department Alexey Kudryavtsev, pellet production technologist Elena Vagina, chief of planning and economy department Yulia Perepechenyh, chief manager of sales department Tatiana Savelyeva, external consultant (Biomass Consult)
Brief Overview of Audit Process for this Location:	See section 6.2
Comments:	No comments