

NEPCon Evaluation of UAB "Gairelita" Compliance with the SBP Framework: Public Summary Report

Fourth Surveillance Audit

www.sbp-cert.org





Completed in accordance with the CB Public Summary Report Template Version 1.4

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

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

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

Current report completion date: 29/Oct/2019

Report authors: : Gerimantas Gaigalas

Name of the Company: UAB "Gairelita"

Company contact for SBP: Mr. Kestutis Burdulis, economic adviser

Certified Supply Base: sourcing from Latvia, Lithuania, Estonia, Norway, Sweden, Belarus, Russia

SBP Certificate Code: SBP-01-10

Date of certificate issue: 04/Mar/2016

Date of certificate expiry: 03/Mar/2021

This report relates to the Fourth Surveillance Audit



2 Scope of the evaluation and SBP certificate

Scope of this evaluation is based on SBP standards 2; 4; and 5.

The certificate scope covers the production site in Radviliskis, Lithuania. The Organisation holds valid FSC Chain of Custody and FSC Controlled wood certificate, covering pellet production.

The input material used by the organisation for biomass production (both as raw material for pellet production and feedstock used into dryer) contains secondary feedstock supplied by suppliers from Lithuania and Latvia. Based on FSC system (credit system) FSC certified and controlled feedstock is used for FSC pellet production. Wood pellets are sold through Klaipeda (under FOB, DAP) port in Lithuania and Riga (under FOB, DAP) port in Latvia as well as from production side (under EXW). The scope includes Instruction Document 5D Dynamic Batch Sustainability Data.

All inputs materials delivered to the pellet production plant are FSC certified, FSC controlled wood or included in the Organisation's FSC Controlled wood verification system. Feedstock used in the biomass production originates from Latvia, Lithuania, Estonia, Belarus, Norway, Russia and Sweden.

Scope description:

Production of wood pellets, for use in energy production, at Radviliskis, Lithuania and transportation to port of Riga, Klaipeda. Dynamic Batch Sustainability Data are included in the scope of the certificate. The scope of the certificate does not include Supply Base Evaluation.



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;
- SAR and profiling data collection analysis;
- Instruction Document 5D Dynamic Batch Sustainability Data



4 SBP Standards utilised

4.1 SBP Standards utilised

Please select all SBP Standards used during this evaluation. All Standards can be accessed and downloaded from https://sbp-cert.org/documents/standards-documents/standards

- ☐ SBP Framework Standard 1: Feedstock Compliance Standard (Version 1.0, 26 March 2015)

4.2 SBP-endorsed Regional Risk Assessment

Not applicable. Supply Base Evaluation is not covered by the Scope of the Evaluation



5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

BP is a biomass producer with a production site situated in Radviliskis, Lithuania. BP is sourcing secondary feedstock for its production. Pellets are produced from sawmill residuals (chips, sawdust and shavings). The pellets could be sold as SBP compliant by bulk.

The suppliers from Latvian and Lithuanian deliver feedstock; however, the place of harvesting of the secondary feedstock is originating from not only Latvia and Lithuania, but also Belarus, Estonia, Norway, Sweden and Russia. All Feedstock is delivered to the pellet plant by road transport. BP is using its own transport, so the information about the producer is available and is trustworthy.

Incoming feedstock is either FSC certified, FSC Controlled or controlled according to the existing BP FSC Controlled wood verification program is applicable for feedstock originating from Latvia and Lithuania. The feedstock originating from Belarus, Norway, Estonia, Sweden and Russia is coming with FSC claim. Origin information is kept, and origin information access agreements are signed with feedstock suppliers. As a part of the Origin Verification program BP is conducting regular supplier audits and requesting its suppliers to sign origin declaration agreements.

The BP is implementing FSC credit system. The amount of the biomass produced according to FSC credit system might be sold as SBP-compliant or SBP- controlled biomass claim.

After the production, pellets are stored in BP's facilities and then loading into the buyer's transport. Sales are done based on the FOB, DAP or EXW sales conditions.

5.2 Description of Company's Supply Base

BP is sourcing secondary feedstock only for its production. All feedstock is delivered by companies registered in Latvia and Lithuania, however the feedstock may originate also from Belarus, Norway, Sweden, Estonia and Russia.

Latvia:

3.2 million ha of forest, agricultural lands 1,87 million ha. Forests cover 51% of the total area. Area covered by forests is increasing. The expansion happens due to both natural afforestation of unused agricultural lands and by afforestation of low fertility agriculture land. Forests lands consist of forests 91,3%, marshes 5.3%, open areas 1,1%), flooded areas 0,5% and objects of infrastructure 1,8%. The main wood species are pine 34.3%, birch 30.8% and spruce 18.0%. Other wood species are aspen, aspen, black alder, ash and oak.



51.8% of whole forest area is owned by state, 1.4% are in municipal ownership, but other 46.8% are private forests and other forest ownership types (data: State Forest Service statistics, 2014). Management of the state-owned forests is performed by the public joint stock company AS Latvijas Valsts Meži, established in 1999. The enterprise ensures implementation of the best interests of the state by preserving value of the forest and increasing the share of forest in the national economy.

Historically, extensive use of forests as a source of profit began later than in many other European countries, therefore a greater biological diversity has been preserved in Latvia. For the sake of conservation of natural values, a total number of 674 protected areas have been established. Part of the areas have been included in the European network of protected areas Natura 2000. Most of the protected areas are state-owned.

In order to protect high nature conservation values such as rare and endangered species and habitats that are located outside designated protected nature areas, micro reserves are established. According to data of the State Forest Service (2015), the total area of micro reserves constitutes 40 595 ha. Identification and protection planning of biologically valuable forest stands is carried out continuously primarily in state forests.

On the other hand, there are general nature protection requirements binding to all forest managers established in forestry and nature protection legislation aimed at preservation of biological diversity during forest management activities. They stipulate a number of requirements, for instance, preserving old and large trees, dead wood, undergrowth trees and shrubs, land cover around micro-depressions thus providing habitat for many organisms, including rare and/or endangered species.

Latvia has been a signatory of the CITES Convention since 1997. CITES requirements are respected in forest management, although none of local Latvian tree and shrub species are included in the CITES annexes.

Areas where recreation is one of the main forest management objectives add up to 8 % of the total forest area or 293 000 ha (2012). Observation towers, educational trails, natural objects of culture history value, picnic venues: they are just a few of recreational infrastructure objects available to everyone free of charge. Special attention is devoted to creation of such areas in state-owned forests. Recreational forest areas include national parks (excluding strictly protected areas), nature parks, protected landscape areas, protected dendrological objects, protected geological and geomorphologic objects, nature parks of local significance, the Baltic Sea dune protection zone, protective zones around cities and towns, forests within administrative territory of cities and towns. Management and governance of specially protected natural areas in Latvia is co-ordinated by the Nature Protection Board under the Ministry for Environmental Protection and Regional Development.

5% of Latvian inhabitants are employed in forestry, wood-working industry, furniture production Industry.

The share of forestry, woodworking industry and furniture production amounted to 6 % GDP in 2012, while export yielded 1.7 billion euro (17 % of the total volume of export). State forests are FSC/ PEFC certified. In addition to state forest enterprise, 6 private forest managers are managing forests in accordance with FSC standard requirements. The FSC certified are in the country amounts to a total of 1,743,157 ha, including 248,021 ha of private forestland. 1,683, 641 ha forests are also PEFC certified.

Lithuania

Agricultural land covers more than 50 percent of Lithuania. Forested land consists of about 28 percent, with 2.17 million ha, while land classified as forest corresponds to about 30 percent of the total land area. The



south-eastern part of the country is most heavily forested, and here forests cover about 45 percent of the land. The total land area under the state Forest Enterprises is divided into forest and non-forest land. Forestland is divided into forested and non-forested land. The total value added in the forest sector (including manufacture of furniture) reached LTL 4.9 billion in 2013 and was 10% higher than in 2012. According to the ownership forests are divided into state (1.08 million ha), private forests (0,85 million ha) and other ownership types (0.2 million ha).

According to the ownership right forests are divided in to: state forests – 1081 000 ha (49.7%), private forests - 858 000 ha (39.4%) and forest reserved for restriction 238 000 ha (10.9%).

Forest land is divided into four protection classes: reserves (2 %); ecological (5.8 %): protected (14.9 %); and commercial (77.3 %). In reserves all types of cuttings are prohibited. In national parks, clear cuttings are prohibited while thinning and sanitary cuttings are allowed. Clear cutting is permitted, however, with certain restrictions, in protected forests; and thinning as well. In commercial forests, there are almost no restrictions as to harvesting methods.

Lithuania is situated within the so-called mixed forest belt with a high percentage of broadleaves and mixed conifer-broadleaved stands. Most of the forests - especially spruce and birch - often grow in mixed stands. Pine forest is the most common forest type, covering about 38 percent of the forest area. Spruce and birch account for about 24 and 20 percent respectively. Alder forests make up about 12 percent of the forest area, which is high, and indicates the moisture quantity of the sites. Oak and ash can each be found on about 2 percent of the forest area. The area occupied by aspen stands is close to 3 percent

Lithuania has been a signatory of the CITES Convention since 2001. CITES requirements are respected in forest management, although there are no local tree and shrub species included in the CITES annexes.

All state-owned forests 1081 000 ha are FSC certified. In addition to state forest enterprise, 4 private forest managers are managing forests (35 869 ha) in accordance with FSC standard requirements.

Estonia

Estonia is a member of the European Union since 2004. The Estonian legislation is in compliance with the EU's legislative framework and directives. National legislative acts make references to the international framework. All legislation is drawn up within a democratic system, subject to free comment by all stakeholders. The Estonian legislation provides strict outlines in respect to the usage of forestry land and the Estonian Forestry Development Plan 2020 has clear objectives and strategies in place to ensure the forestland is protected up to the standards of sustainable forest management techniques.

The Ministry of the Environment coordinates the fulfilment of state duties in forestry. The implementation of environmental policies and its supervision are carried out by two separate entities operating under its governance. The Estonian Environmental Board monitors all of the work carried out in Estonia's forests whereas the Environmental Inspectorate exercises supervision in all areas of environmental protection.

The forest is defined in the Forest Act. There are three main forest categories described in this legislation: commercial forests, protection forests and protected forests. According to the ownership, forests are also divided into private forests, municipality forests and state-owned forests. The state owned forest represent



approximately 40% of the total forest area and are certified according to FSC and PEFC forest management and chain of custody standards in which the indicators related to forest management planning, maps and availability of forest inventory records are being constantly evaluated and addressed. The state forest is managed by State Forest Management Centre (RMK) which is a profit-making state agency founded on the basis of the Forest Act and its main duty lies in a sustainable and efficient management of state forest. Overall there is 1 491 863 ha5 of FSC certified and 1 241 612 ha6 of PEFC certified forest.

Currently more than 2 232 000 ha, equal to 49,3% of the Estonian land territory, is covered by forest. According to FAO data, during 2000 - 2005, average annual change in the forest cover was +0.4 % . Forestry Development Plan 2012-2020 and Yearbook Forest 2014, that gives annual reports and facts about the forest in Estonia, state that during last decade the cutting rate in Estonian forests is from 7 to 11 mill m³ per year . The amount is in line with sustainable development principle when the cutting rate doesn't exceed the annual increment and gives the potential to meet the long-term economic, social and environmental needs. According to the Forestry Development Plan 2012-2020 the sustainable cutting rate is 12-15 mil ha per year.

Belarus

In Belarus, forestland covers 9.5 million ha. Forests are quite evenly spread over the country's six regions with the average value of the forest cover (ratio between the stocked forestland and the total land) being 39.3%. Area of Agricultural area 8.7 million ha.

The area covered by forest is increasing. The expansion happens both naturally and by afforestation of infertile land unsuitable for agriculture. Within the last decade, the timber production in Belorussia has fluctuated approx., 11 million cubic metres (http://www.mlh.by, 2015.)

Forest area of Belarus consists of Belarus consist of: forests- 7,89 million ha, Other wooded land 0.91 million ha. The main wood species in Belarus are: pine 50,4%, spruce 9,2%; birch 23,1%; black alder 3,3%; grey alder 3,3%: aspen 2,1%; other species 3,3%.

The forests in the Republic of Belarus are state property. Forests under the jurisdiction of the Ministry of Forestry (Minleshoz) cover 86% of the forest fund. Besides, a significant share of the forest fund is managed by the Administration of the President of the Republic of Belarus (8%) and by the Ministry of Emergency Situations of the Republic of Belarus (2%).

In Belarus, an environmental protection system has been in place since 1960, from the time a Nature Protection Committee was established. Specially protected area accounts 7,7 % of the whole area of the country. However, together with the natural sites subject to special protection such as water conservation zones and areas of habit and growth of endangered wild animals and plant species, this figure increases to 22,1 % of the country's total area.

It is considered that about 75 % of the original Central European mixed forest cover is estimated to be lost. Pristine and relic stands of this forest type are believed to have been eliminated complete except in Belovezha Forest, which is located close to Belarus and Poland border. It is one of the largest and best presented forest tract in the lowlands Europe. It still contains a wide array of old-growth forest stands representing all the major



habitat types, a rich variety of wildlife and a still not sufficiently studied numerous lower plants, fungi and slime moulds.

Belorussia has been a signatory of the CITES Convention since 1995. CITES requirements are respected in forest management, although there are no species included in the CITES lists in Belorussia.

Forest regeneration is carried out annually over an area of 32,000 ha, including 81% of the forest planting and seeding and 19% by natural regeneration. There are 2 strictly protected Nation reserves and 4 National parks present in Belarus at the moment. Area of National reserves accounts 2,98 million ha and area of National parks is 3,98 million ha.

Forestry and the forest industry are essential parts of the republic's economy. In Belarus wood-based industry consists of forestry (13.5% of all production), Roundwood processing (69,5% of all production), pulp and paper (16,4% of all production) sectors.

All forest area is certified by PEFC certification scheme: 7,7 million. ha (83 forestry) and FSC certification scheme 5,0 million. ha (61 forestry)

Norway

About 38% of the surface area in Norway is covered by forest. The total forested area amounts to 12 million hectares, including more than 7 million hectares of productive forest. 15% of the productive forest has been estimated as non-economic operational areas due to difficult terrain and long-distance transport, which means that economical forestry may only be operated in about 50% of the forested area. The most important species are Norway spruce (47%), Scots pine (33%) and birch (18%).

From the forest area: Privately owned forests 80 %; State and municipalities 12%.

Industrial private 4 %; Local common land 4 %

All productive forests in Norway are certified, i.e. 7.397.000 hectares (both FSC and PEFC). The number of certified forest owners is approximately 43.000 (private, municipalities, state).

Approximately 6.4% of mainland Norway has protected area status. In addition, 15,000 square km of Spitsbergen is designated as conservation area - national parks, nature reserves or other kinds of protected area cover 10-12% of the area of the remote islands.

The total number of species in Norway is estimated to be 45,000, of which approximately 33,000 are known and described. It exists information enough to estimate whether a species is threatened or not for only 10,000 species. Of these, 150 are threatened by extinction, 279 are deemed vulnerable, 800 are categorized as rare (the last number also includes species, which are rare of natural causes and not only because of human intervention). 359 are deemed species of special concern, 36 species are indeterminate, while 169 species are classified as insufficiently known.

Species "Red lists" can be used to point out the habitats containing an especially rich variety of endangered species. Red list species have often proved to be the red warning lights of nature to tell us that a biotope is threatened or something else is wrong in nature. The red lists also give us a picture of the condition of our flora



and fauna and may contribute to the efforts of securing and improve the ecosystem for these species. http://www.borealforest.org/world/world norway.htm

In the country, there are areas of endangered high conservation value forests. More specifically, there are Global200 and IFL areas in the northern mountain regions.

Norway has been a signatory of the CITES Convention since 1976. CITES requirements are respected in forest management, although there are no local tree and brush species included in the CITES lists annexes.

Those regions identified by Conservation International as a Biodiversity Hotspot. Those forest, woodland, or mangrove ecoregions identified by World Wildlife Fund as a Global 200 Ecoregion and assessed by WWF as having a conservation status of endangered or critical. Those regions identified by the World Resources Institute as a Frontier Forest Intact Forests Landscapes, as identified by Greenpeace (www.intactforests.org)

In 2006 forestry and the forest industries accounted for about 0.8% of the Gross National Product in Norway. Of the total employment of 2.443.000 persons in Norway, approximately 40.000 people receive their income from forestry and from the forest industry. 6.700 persons (0.3%) are directly employed in forestry. About 50 percent of the Norwegian round wood harvested is used by sawmills. There are 225 sawmills in Norway operating on an industrial scale.

Švedija

Švedijos miškų agentūra yra nacionalinė institucija, atsakinga už su mišku susijusius klausimus. Ji siekia užtikrinti, kad šalies miškai būtų tvarkomi taip, kad derlius būtų gausus ir tvarus, tuo pačiu išlaikant biologinę įvairovę. Agentūra taip pat siekia geriau suvokti miško reikšmę, įskaitant jo vertę rekreacijai lauke. Agentūra turi biurus visoje šalyje. Svarbiausios jos užduotys yra patarti su mišku susijusiais klausimais, prižiūrėti, kaip laikomasi Miškų įstatymo, teikti paslaugas miško pramonei, remti gamtosaugos pastangas ir atlikti inventorizaciją. Švedija yra antra pagal dydį Europoje apželdinta teritorija po Rusijos. Produktyvūs Švedijos miškai užima apie 23 milijonus hektarų. Tačiau jei šis plotas apskaičiuojamas pagal tarptautinius miško žemės apibrėžimus, jis yra 27 milijonai hektarų. Švedijos miškuose vyraujančios rūšys yra eglė ir pušys. Šios dvi rūšys sudaro daugiau kaip 80% medienos atsargų. Šiaurės Švedijoje pušys yra labiausiai paplitusios rūšys, tuo tarpu pietinėje Švedijoje vyrauja eglės, sumaišytos su kai kuriais beržais. Dėl efektyvaus ir toliaregiško miškų tvarkymo per pastaruosius šimtą metų Švedijos medienos atsargos padidėjo daugiau nei 60% ir dabar yra 300 milijonų m3. Pastaraisiais metais iškirstas kiekis buvo nuo 85 iki 90 milijonų m3, o metinis prieaugis siekia apie 120 milijonų m3.

Švedijoje saugomų miškų yra apie 1,9 milijono hektarų. Didžiuliu mastu, apie 90% šių miškų yra miškai, kuriuose leidžiama nedidelė intervencija. Griežtai saugomų miškų, kuriuose negalima įsikišti žmonėms, dalis sudaro 0,3% miško ploto. Nacionaliniai parkai, gamtos draustiniai ir gamtos apsaugos teritorijos užima 4,2 milijono hektarų plotą, t.y. 10% Švedijos sausumos ploto. Yra mažiausiai 220,00 ha saugomų miškų, kurie vis dar miškų augimo prasme yra produktyvūs. Be to, yra apie 12 000 ha saugomų buveinių tipų ir 25 000 ha medienos žemės, atidėtos ir saugomos aplinkos apsaugos susitarimais. Dideli miško plotai taip pat yra saugomi iš miško savininkų savanoriškos veiklos. Švedija 1974 m. rugpjūčio mėn. pasirašė Konvenciją dėl nykstančių laukinės faunos ir floros rūšių, o konvencija įsigaliojo 1975 m. liepą. Švedija taip pat įsteigė Tarptautinės gamtos apsaugos sąjungos nacionalinį komitetą.



Privačių miškų savininkų šeimos valdo apie 50% Švedijos miškų, privačios miškininkystės įmonės - apie 25%, o valstybė ir kiti valstybiniai savininkai turi likusius 25%. Švedijos miškų nuosavybė įvairiuose regionuose skiriasi. Pietinėse šalies dalyse miškai daugiausia priklauso privatiems asmenims, tuo tarpu Šiaurės Švedijoje jmonės valdo didesnį kiekį miškų.

Dėmesys tvariems apsirūpinimo produktais sprendimams 80% Švedijos miškų žemės yra sertifikuota pagal FSC arba pagal PEFC sertifikavimo schemas. FSC sertifikuoti miškai sudaro 10,2 milijono hektarų, o PEFC sertifikuoti - 7,5 milijono hektarų. Iš visų 7,5 milijono hektarų, sertifikuotų pagal PEFC schemą, 3 milijonai hektarų priklauso šeimai.

Russia:

Forests cover 46.6% of the area of the Russian Federation, which is 1183.3 million hectares. The total area of FSC forestland on the territory of the Russian Federation is 764 million hectares, accounting for about 21% of world reserves of standing timber.

Forests are mainly boreal. Areas occupied by the main wood species plantations remain rather stable within last decades. Hardwood species compose 68.4%, softwood – 21,7%. Other wood species compose less than 1% of the forests.

The total reserve of the wood in the forests located on forest fund land is 80 billion m3. In accordance with Russian legislation, 100% of the forest fund land are state property. Legal entities can use forest areas in lease and short-term use. Lease relations are the dominant legal form of forests using. Allowable woodcutting area in the Russian Federation is about 660 million m3, including softwood - 370 million m3. Using the allowable woodcutting area does not exceed 35% of the country territory.

According to Rosleskhoz (Russian Forestry), data the total recourses of increased volumes of cutting with the aim of cutting within the country is about 400 million m3 per year. High quality reproduction of forest resources and protective forestation is a prerequisite for use of forests. All reforestation activities in leased forest areas are planned and carried out by forest users at their own expense in accordance with the forest management projects. The main way of reforestation in the Russian Federation is the procurement of natural regeneration. Artificial reforestation is carried out by creating forest plantations: planting or seeding of forest plants in the region of the supply base where active wood-cutting is taking place. As well all forest users plan and implement a set of fire-prevention measures aimed at preventing and reducing the after-effects of forest fires in the summer period.

According to the forest, legislation of the Russian Federation the species listed in the Red Book shall be preserved as well as their habitats when harvesting. Banned is harvesting of precious, become extinct and specially protected wood species.

Forest complex of the Russian Federation, including the forestry and forest industry of harvesting and wood handling occupies an important place in the economy of the country. Products of forest complex are widely used in many industries, construction, agriculture, printing, trade and medicine.



The forest complex of the Russian Federation employs about 60 thousand of large, medium and small enterprises in all regions of the country.

The share of the forestry sector accounts 1.3% of GDP; 3.7% of the total industrial output, 2.4% of foreign profits in the scale of the Russian Federation. The total number of employees in the forest complex of Russia is about 1 million people.

From the total production of forest complex of the Russian Federation about 60% products are for the domestic market and 40% - for export.

Forest certification is an effective tool for combating against illegal harvesting and illegal wood trade. The forest certification FSC (Forest Stewardship Council) is widely used in Russia. The total area of FSC certified forests is 619 821.4 ha. Also, the certification system PEFC (Program for the Endorsement of Forest Certification Schemes) is used but less extensively. Certified forest area in Russia is about 40 million hectares, or 30% of the total number of forests under lease. Certified forests are located in 25 regions of Russia. The number of FM certificates on forest management is 121, the number of chain of custody certificate CoC is 320. Also, the number of certificates for controlled wood is growing steadily, according to recent data it was about 140. The dynamics of forest certification in Russia points to the ever-increasing activity of wood companies, which indicates to the responsibility to ensure the legality of wood harvested and compliance with environmental and other requirements.

Detailed information about the supply base region (general description of the forest resources and forest management practices within the Supply Base) is publicly available at the BP's homepage: http://www.gairelita.lt

5.3 Detailed description of Supply Base

Total Supply Base area (ha): 808,1 million ha (including Latvia, Lithuania, Belarus, Estonia, Sweden, Norway and whole area of Russia)

Tenure by type (ha): 791.66 million ha state ownership, 18,16 million ha private forests; other 0.28 million ha

Forest by type (ha): boreal 808,1

Forest by management type (ha): 808,1 million ha managed natural

Certified forest by scheme (ha): FSC, total certified area 59,51 million ha (FSC) and 18,13 million ha PEFC

Quantitative description of the Supply Base can be found in the Biomass Producer's Public Summary Report http://www.gairelita.lt/

Number of suppliers: 44

Controlled Feedstock 0%

SBP-compliant Primary Feedstock 0%

SBP-compliant Secondary Feedstock 100%

SBP-compliant Tertiary Feedstock 0%



SBP non-compliant Feedstock 0%

Species Picea abies (L.) H. Karst.; Pinus sylvestris (L.); Alnus glutinosa (L.) Gaertn.; Alnus incana (L.) Moench, Populus tremula (L.); Betula pendula (Roth); Betula pubescens (Ehrh.)

5.4 Chain of Custody system

The Organisation is holding valid FSC Chain of Custody and FSC Controlled wood certificate. Valid FSC system description and other documents exist.

The Organisation is implementing FSC credit system. FSC Credit system is used for materials received as FSC certified, FSC Controlled wood and feedstock verified according to the Organisation's own Controlled wood verification system. The Controlled wood system or the organisation is covering only Latvia and Lithuania. Feedstock from Norway, Sweden, Estonia, Belarus and Russia is delivered by FSC certified suppliers and are coming with FSC certification claim. Supplier list is maintained. The BP was FSC assessed in September 2015.

After the reception, incoming feedstock and unloaded into piles according to type of feedstock and load is registered into the recordkeeping system. For the credit account purposed, the volume of feedstock is recalculated into the sawdust and then into the tons based on the conversion factors and volume into tons recalculation coefficient. It is designated into the procedures, that FSC credit account is updated once in a month: with the data about the raw material, reception and pellets sold with the SBP claim.

In case of the FSC and / or SBP sales, the volume of sold pellets is withdrawn from the credit account.



6 Evaluation process

6.1 Timing of evaluation activities

Activity	Location	Date/time
Energy use calculations review	NEPCon office	09/09/2019
		9.00 – 12.15
Documents and procedures review (SBR, Biomass Profiling Data, SBP	NEPCon office	12/09/2019
procedures)		13.00 – 16.45
Opening meeting	Office	20/09/2019
		9.00-9.15
Documents and procedures review Inputs and outputs review	Office	9.15-11.00
Energy use calculations review	Production facilities	11:00 – 14:30
Chain of custody review (site tour), interview with responsible persons	Office	14:30-15:15
Staff interviews	Production site and office	15:15-16:45
Closing meeting (pre - final)	Office	16:45 – 17:00
Supplier verification audit (Lithuania)	UAB Multimeda	19/09/2019
	UAB Volimeda	
Supplier verification audit (Latvia)	SIA Piebalgas	09-10/10/2019
	SIA Larix	
	SIA "Kokapārstrāde 98"	
Closing meeting	Desk	14/10.2019



6.2 Description of evaluation activities

Auditor(s), roles	Qualifications
Gerimantas Gaigalas	He has Master 's degree on Forestry (graduated in Lithuanian Academy of Agriculture), BSc degree in Law and Master 's degree in International Law (graduated in University of Mykolas Romeris) and diploma in programming
Lead auditor Evaluation against all applicable requirements	(Electronic College in Vilnius). He has experience leading the International Relations and Agreements Division in the Ministry of Environment as well as experience working in United Nations Development Programme (UNDP) Papua New Guinea regional office and Institute of Environment Sustainability of EU Commission in Italy. Gerimantas has successfully passed Forest Management and Chain of Custody lead auditor training. Gerimantas is working in UAB "NEPCon LT" as certification manager since 2013. Since 2014 he is implementing PEFC CoC audits, in 2013 completed PEFC CoC auditor training according to the new Chain of Custody standard. In 2016, he got the SBP lead auditor qualification and started to audit according to SBP scheme.
Povilas Misierauskas, Auditor in training	P. Misierauskas is NEPCon certification manager (auditor – apprentice). P. Misierauskas hold Bachelor degree in Ecology and Environment and Master in Forest Ecology. He graduated from the Lithuanian University of Agriculture. Mr Misierauskas taught laboratory work to Forest Ecology faculty dendrology discipline's students Forest Ecology faculty, implemented planting and green space inventory. He assessed green areas in 22 town and region municipalities. P. Misierauskas has a lot of experience in assessing preserved trees, identifying their state and value and implementing dendrological (decorative trees and bushes) expertise. He has been working as certification manager at NEPCon since 2013. Since 2018 he is implementing PEFC CoC audits, in 2018 completed PEFC CoC auditor training according to the Chain of Custody standard.
Girts Karss Auditor Suppliers evaluation in Latvia	Girts Karss. Works for NEPCon since 2011. Girts 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 certification systems and obtained the FSC lead auditor qualification. In addition, he got the SBP lead auditor qualification. Girts Karss has participated in a number of FSC forest management and SBP assessments and annual audits.
Ēriks Lidemanis Auditor Suppliers evaluation in Latvia	Joined NEPCon in 2017. Holds bachelor's degree from Latvia University of Agriculture Forest Faculty (forest management). Previous work experience in wood processing industry and roundwood measurement. Ēriks has passed the NEPCon lead assessor training course in FSC Chain of Custody and FSC FM operations and obtained the FSC CoC/FM auditor qualification. And has participated in FM audits in Latvia, Lithuania and Russia. Successfully obtained SBP auditor qualification in 2019 and participated in SBP audits in Latvia. Eriks has participated as auditor and



lead auditor in FSC Chain of Custody audits in a number of forest sector and timber primary, secondary, tertiary processing companies in Latvia

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

The audit 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 audit:

September 20, 2019.

Auditor was welcomed in UAB Gairelita office in Radviliškis. Auditors started with an opening meeting attended by Economic Consultant, Director and Director of commerce. Auditor provided information about audit plan, methodology, auditor qualification, confidentiality issues, auditing methodology and clarified the audit scope.

During the audit, the auditor evaluated existing production. After that auditor went through all applicable requirements of the SBP standards No. 2, 4, 5, existing chain of custody and management system, CoC, record keeping / mass balance requirements, emission, energy data, and categorisation of input and verification of SBP compliant feedstock/ biomass. During the process, overall responsible person for SBP system and over responsible staff having key responsibilities within the system were interviewed.

After a roundtrip around BP's pellet production was undertaken. During the site tour applicable records were reviewed, production staff was interviewed. At the end of the day the preliminary results were presented.

September 19, 2019.

Two local suppliers from Lithuania (UAB Multimeda and UAB Volimeda) were visited and inspected. During the supplier audits, auditor observed the audit methodology of the supplier audits conducted by the BP team. For sampling details see the finding 1.4 Annex A.

October 9-10, 2019

Three local suppliers from Latvia (SIA Piebalgas, SIA Larix, SIA "Kokapārstrāde 98") were visited and inspected. During the supplier audits, auditor observed the audit methodology of the supplier audits conducted by the BP team. For sampling details see the finding 1.4 Annex A.

6.3 Process for consultation with stakeholders

Not applicable



7 Results

7.1 Main strengths and weaknesses

Strength: SBP system elements are implemented at the time of the audit. Use of the FSC credit system. Efficient record keeping system. Small number of the management staff and clearly designated responsibilities within the staff members.

Weaknesses: Nevertheless, of the good performance this year, the company has to deal with reputation issue, which was damaged 3 years ago, when the big fire and the death of production manager took place in the company's premises.

7.2 Rigour of Supply Base Evaluation

Not applicable

7.3 Collection and Communication of Data

BP has a system to gather and record Greenhouse Gas emissions. During the audit, BP made detailed overview of the systems and databases to gather and record such data. Evidence was provided to auditors.

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: Economic Consultant, Director, Director of commerce, accountant.

Overall responsible person has all required competences, education and work experience from timber and industry sector, but these requirements are not described in procedures.

According to interviews, review of biomass producer sales manager's CV and set of procedures and documents that were composed for the SBP system, auditors evaluated the competency of main responsible staff to be sufficient.

7.5 Stakeholder feedback

Not applicable



7.6 Preconditions

No open preconditions.



8 Review of Company's Risk Assessments

Describe how the Certification Body assessed risk for the Indicators. Summarise the CB's final risk ratings in Table 1, together with the Company's final risk ratings. Default for each indicator is 'Low', click on the rating to change. Note: this summary should show the risk ratings before AND <u>after</u> the SVP has been performed and after any mitigation measures have been implemented.

Not applicable



9 Review of Company's mitigation measures

Not applicable



10 Non-conformities and observations

Identify all non-conformities and observations raised/closed during the evaluation (a tabular format below may be used here). Please use as many copies of the table as needed. For each, give details to include at least the following:

- applicable requirement(s)
- grading of the non-conformity (major or minor) or observation with supporting rationale
- timeframe for resolution of the non-conformity
- a statement as to whether the non-conformity is likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks.

NC number 01/19	NC Grading: Minor
Standard & Requirement:	Standard #2: Verification of SBP-compliant feedstock
	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. (6.2)

Description of Non-conformance and Related Evidence:

BP has 44 secondary suppliers, out of which 22 are secondary producers and 22 – primary producers. During the auditing period 10 secondary suppliers were changed (new). Supplier list is available. The information about the raw material origin is collected through the supplier origin declaration and is confirmed based on the supplier audits. The same suppliers provide feedstock for drier (FSC Mix Credit and FSC Controlled wood). According the SBP procedures origin declaration shall be signed with every supplier and supplier audits shall be conducted for all suppliers at least once in a year. It was confirmed during the audit that supplier origin declarations (Exh. 13) are signed with all the suppliers included in the supplier list of the company. During the audit supplier verification audits were done for 2 suppliers from Lithuania and 3 suppliers from Latvia. During the audit checking the supplier verification audit reports it was noticed that not all secondary suppliers were verified during the auditing period as it is foreseen in SBP procedures. Considering that the origin was not yet re-confirmed and demonstrated for all secondary feedstock suppliers and that BP plans till the end of this year to complete the supplier verification program, the auditor decided to rise minor non-conformance.

Timeline for Conformance:	By the next surveillance audit, but no later than 12 monhts from report finalisation date
Evidence Provided by Company to close NC:	PENDING
Findings for Evaluation of Evidence:	PENDING
NC Status:	Open



11 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 Serrano	
Date of decision:	29/Oct/2019	
Other comments:	N/A	