

NEPCon Evaluation of Scandbio Latvia SIA Compliance with the SBP Framework: Public Summary Report

Fourth Surveillance Audit

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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

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Current report completion date: 23/Jul/2019

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Name of the Company: SIA "Scandbio Latvia", "Griķi", Laucienes pagasts, Talsu novads, LV-3285,

Company contact for SBP:

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ilze.lutjanska@scandbio.com

Certified Supply Base: Latvia, Lithuania, Estonia, Sweden and Finland

SBP Certificate Code: SBP-01-01

Date of certificate issue: 25/Sep/2015

Date of certificate expiry: 24/Sep/2020

This report relates to the Fourth Surveillance Audit



2 Scope of the evaluation and SBP certificate

The certificate scope covers the production site and office in "Griķi", Laucienes pagasts, Talsu novads, LV-3285, Latvia

The Organisation holds FSC Chain of Custody and FSC Controlled wood certificate TT-COC-004922 and TT-CW-004922. Certificate covers both FSC certification as well as FSC Controlled wood certification and controlled wood verification system for feedstock originating from Latvia. In additional to this the Organisation holds valid single Chain of Custody PEFC certificate. Certificate number TT-PEFC-COC71.

SIA "Scandbio Latvia" purchases raw materials (only secondary and tertiary feedstock) from companies registered in Latvia. The feedstock itself originates from Latvia, Lithuania, Estonia, Sweden and Finland.

Since the beginning of year 2016, all secondary and tertiary feedstock is delivered as FSC/ PEFC certified or controlled.

The BP sells pellets on EXW and FOB Mersrags. Pellets sold under the FOB Mersrags conditions are stored in the Mersrags harbour.

SBP certificate scope: production of wood pellets, for use in energy production, at ScandBio Latvia SIA and transportation to Mērsrags harbour. The scope of the certificate does not include Supply Base Evaluation. Procurement and sales of the pellets produced by other SBP certified BPs.



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 and storage site visits;
- 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;
- Evaluation of the SBP sales documents;
- Witness origin confirmation audits conducted into the supplier premises.



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

SIA "Scandbio Latvia" is a biomass producer with a production site, office, small storage located in "Griķi", Laucienes pagasts, Talsu novads, LV-3285, Latvia and storage site situated in Mersrags harbour.

BP is sourcing secondary and tertiary feedstock for its pellet production.

Pellets are produced from secondary feedstock: (wood industry residues: sawdust, wood chips) and tertiary feedstock (dry sawdust with shavings) or mixture of these two feedstock types classified as a secondary feedstock.

FSC certified or FSC Controlled wood heating chips and bark is purchased for the use into the biomass drier. Pellets are used for the steam production as well.

All Feedstock types are delivered to the pellet plant by road transport, biomass is transported to harbour by road transport as well.

In SIA "Scandbio Latvia" most of the raw materials are secondary and tertiary material from feedstock originating from Latvia and Lithuania, smaller part from Finland and there is a possibility to source also from Estonia and Sweden. All secondary and tertiary feedstock is delivered with FSC / PEFC certification or FSC Controlled Wood claim.

From the beginning of the year 2016 all inputs materials delivered to the pellet production plant from are FSC certified, PEFC certified, FSC Controlled wood. The organisation is not applying Organisation's FSC Controlled wood verification system for Latvia even though included in the FSC Controlled wood system of the organisation.

The information about Origin is kept and there is an agreement signed with all feedstock suppliers with requirement to provide the access to the information about origin. As a part of the origin verification program BP is conducting supplier audits.

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

After the production, pellets are transported into the harbour storage place by trucks.

In addition the BP is buying biomass (pellets) produced by other BP's and is selling it unchanged to its buyers. The BP implements transfer system. Organisation is operating as a broker without physical possession. There are no additional emissions associated with handling of biomass at the time of possession of the BP. Procurement and sales incoterm is the same.

5.2 Description of Company's Supply Base

BP is sourcing secondary and tertiary feedstock only for its production.

Latvia:



3.056 million ha of forest, agricultural lands 1,87 million ha. Forests cover 51% of the total 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, 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. A total of 1,683, 641 ha forests are also PEFC certified. The figures are correct as of April 2015.

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 southeaster 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. Forest land 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).

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 fairly 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 are is FSC certified.

Estonia

The forest is defined in the Forest Act. There are three main forest categories that are described in this legislation: commercial forest, protection forest 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 (http://www.rmk.ee/organisation/operating-areas) and is certified according to FSC and PEFC forest management and chain of custody standard in which the indicators related to forest management planning, maps and availability of forest inventory records are being constantly



evaluated and addressed (http://www.rmk.ee/organisation/environmental-policy-of-rmk/certificates). 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 1 428 767 ha (FSC Facts and Figures, November 2, 2017) of FSC certified and 1 174 511 ha (PEFC Global Statistics SSFM & CoC Certification, Sep 2017) of PEFC certified forest.

Currently more than 2 230 000 ha, equal to 51% of the Estonian land territory, is covered by forest as indicated in Figure 1 and the share of forest land is growing. According to FAO data, during 2000-2005, average annual change in the forest cover was +0.4 % (http://www.fao.org/forestry/country/32185/en/est/). 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 (Yearbook Forest 2014 http://www.keskkonnaagentuur.ee/sites/default/files/aastaraamat_mets_2014.pdf) all key figures, graphs and tables are bilingual. The amount is in line with sustainable development principle when the cutting rate doesn't exceeds the annual increment and gives the potential to meet the long-term the economic, social and environmental needs. According to the Forestry Development Plan 2012-2020 the sustainable cutting rate is 12-15 mil ha per year. Area of protected forests accounts to 25.3% of the total forest area whereas 10% is considered to be under strict protection. The majority of protected forests is located on state property. The main regulation governing the preservation of biodiversity and the sustainable use of natural resources is the Nature Conservation Act (https://www.riigiteataja.ee/en/eli/517062015004/consolide).

Finland

The forest area of Finland is 22 218 000 ha (State of Europe's Forests 2015. Published by: Ministerial Conference on the Protection of Forests in Europe FOREST EUROPE Liaison Unit Madrid). Different types of conservation areas cover over 3 million hectares (14.5% of the forest area). Strictly protected areas, which are beyond any economic activity, cover 10% of the forests. Almost half of the volume of the timber stock consists of pine (Pinus sylvestris). The other most common species are spruce (Picea abies) downy birch (Betula pubescens) and silver birch (Betula pendula). These species make for 97% of total timber volume in Finland. (http://www.smy.fi/en/forest-fi/finnish-forests-resources/)

Private forest owners (mostly families) own the majority (60%) of Finnish forests. The owner of the forest sells the timber which means that the obtaining logging authorisation through brides does not exist in Finland. Owner needs to get acceptance for forest use declaration from regional forest centres. The state owns 26% of the Finnish forests, private industries, such as forest industry companies 9% and other bodies 5%.

The state forests are mainly situated in the north of Finland, and 45% of them are under strict protection. State lands are managed by Metsähallitus. Certification is voluntary for the forest owner however around 95% of Finnish forests have been certified under the PEFC certification system (Programme for Endorsement of Forest Certification). Certification criteria are stricter than decrees or legislation, which means that in practise, certification determines the standard of silviculture in Finland. Some Finnish forests have also been certified under the Forest Stewardship Council (FSC), however this forms only approximately 6% of the total forest



area. There is ca 1 478 032 ha (FSC Facts and Figures, November 2, 2017) FSC certified forest and 17 660 520 ha (PEFC Global Statistics SSFM & CoC Certification, Sep 2017) PEFC certified forest in Finland. The forest sector is one of key supporters of Finland's economy. In 2011 it employed directly about 70,000 people in Finland, which was 2.8% of all employees. One fifth of Finland's export income comes from forest industries. More than 60% of the value added generated by the forest industries came from pulp and paper industries and the rest from wood products industries in 2011. Regionally, the importance of the forest sector is largest in southeastern corner of Finland and in Etelä-Savo and Central Finland regions, where the sector produces some 10% of the regional GDP.

Sweden

Sweden has Europe's second biggest afforested area after Russia. Sweden's productive forests cover about 28.073 million hectares which is 68.4% of land area in Sweden (State of Europe's Forests 2015. Published by: Ministerial Conference on the Protection of Forests in Europe FOREST EUROPE Liaison Unit Madrid). Spruce and pine are by large the predominant species in Swedish forests. These two species count for more than 80% of the timber stock. In northern Sweden pine is the most common species, whereas spruce, mixed with some birch, dominates in southern Sweden.

Due to effective and far-sighted forest management the timber stock in Sweden has increased by more than 60% in the last one hundred years and it is now 3000 million m3. In recent years felled quantities have been between 85 and 90 million m3, whereas annual growth amounts approximately to 120 million m3.

The amount of protected forests in Sweden amounts to circa 1.9 million hectares. A great extent, about 90% of these forests are the kind of forests in which minor interventions are allowed. The share of strictly protected forests, where no human interventions are allowed is 0.3 % from the forest area. National parks, nature reserves and nature conservation areas cover an area of 4.2 million hectares, i.e. 10% of Sweden's land area. There are at least 220.000 hectares of protected forests which still in terms of forest growth are productive. In addition, there are about 12.000 hectares of protected habitat types and 25.000 hectares of wood land set aside and protected by environment conservation agreements. Large forest areas are also protected through forest owners' voluntary activities. Sweden signed the Convention on International Trade in Endangered Species of Wild Fauna and Flora in August 1974 and the convention entered into force in July 1975. Sweden has also established an IUCN National Committee.

Private forest owner families hold about 50% of Swedish forests, privately owned forestry companies about 25% and the State and other public owners have the remaining 25%. The ownership of forests in Sweden varies between regions. In Southern parts of the country forests are mainly owned by private persons whereas in Northern Sweden companies own more significant amounts of forests. FSC certified forests amount to 12 255 794 ha (FSC Facts and Figures, November 2, 2017) and PEFC certified to 11 549 700 ha. (PEFC Global Statistics SSFM & CoC Certification, Sep 2017)



The forest products industry plays a major role in the Swedish economy, and accounts for between 9-12% of Swedish industry's total employment, exports, sales and added value

5.3 Detailed description of Supply Base

Total Supply Base area (ha): 52,4 million ha

Tenure by type (ha): 35% state ownership, 65% private forests

Forest by type (ha): 31. million ha boreal, 21,5million ha temperate forests

Forest by management type (ha): 52,5 million ha managed natural/semi natural

Certified forest by scheme (ha): FSC, total certified area 34,9 million ha FSC, 12,6 million ha PEFC

5.4 Chain of Custody system

The Organisation holds FSC Chain of Custody and FSC Controlled wood certificate TT-COC-004922 and TT-CW-004922 and SBP chain of custody is based on FSC CoC system. Certificate covers both FSC certification as well as FSC Controlled wood certification and controlled wood verification system for feedstock originating from Latvia. In additional to this BP holds single Chain of Custody PEFC certificate number TT-PEFC-COC71.

The organisation is producing wood pellets from residues of primary wood processing. FSC Credit system is used for accounting of material received as FSC certified, FSC Controlled Wood and feedstock verified according to the Organisation's own Controlled wood verification system. Although FSC Controlled Wood verification program for Latvia is included in the FSC Controlled Wood certificate scope, organization had been sourcing only FSC/PEFC certified material or FSC Controlled Wood material since the beginning of year 2016.

Organisation is also acting as a broker/trader with SBP compliant biomass. Transfer system is used for this purpose. The Biomass producer is acting as a broker without physical possession of certified material. There are no emissions associated with the material in ownership of the Scandbio Latvia, since the product is bought and sold on the same incoterm conditions.

Supplier list of primary suppliers is maintained.

After the reception, incoming feedstock is weighted and unloaded into piles according to type of feedstock and is registered into the recordkeeping system.

Moisture and weight are measured for each feedstock type. FSC credit account and PEFC mass balance accounts are updated once in a month: data about received raw materials by FSC/100% PEFC certified material certification status and volume of sold pellets as FSC and PEFC are recorded.

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

Onsite fourth surveillance evaluation was conducted on July 2-3, 2019

Supplier visits were taking place on the same dates.

In total 2 days were spent for the annual surveillance audit: 1.5 days onsite and 0.5 day for the document review.

Audit plan for the main part of the fourth surveillance evaluation is placed below.

| Activities/ timing | Place | Auditors | Date |
|--|------------------|--------------------------|------------|
| 10.00- 10.30 | Office | Ģ. Karss | 02.07.2019 |
| Opening meeting | | (ĢK), Ēriks Lidemanis | |
| | | (ĒL), Edgars | |
| 10.00- 13:00 | Office | Baranovs(EB) | |
| SBP Management system review, discussion of the | | | |
| changes taking part in a system | | | |
| Review of the documents and evidences related to | | | |
| implementation of the SBP standards 2,4. Office | | | |
| staff interview | | | |
| Review of the FSC and PEFC system control points | | | |
| 14.00- 16:00 | Production site | ĢK, LS, ĒL | |
| 14.00 10.00 | 1 roduction site | ÇIV, LO, LL | |
| Production site visit | | | |
| Verified processes and involved departments | | | |
| Procurements and reception (office manager/ logistic specialist, tractor drivers) | | | |
| Moisture measurements (operators/ laboratory); | | | |
| Production and production records/ (accountancy/ production staff | | | |
| Energy related recordkeeper (Energy/ mechanics/ Mechatronics); | | | |

| Sales and client communication (sales department) | | | |
|--|------------------------|------------|------------|
| 16:00- 17:00 | Suppliers of secondary | LS, ĢK, ĒL | 02.03.2019 |
| On-site supplier audits | feedstock | | |
| | | | |
| | | | |
| | | | |
| 9.00- 12.00 | Suppliers of secondary | LS, ĢK, ĒL | 03.07.2019 |
| On-site supplier audits | feedstock | | |
| 13.00- 14.30 | Office | | |
| 13.00- 14.30 | Office | | |
| Additional interviews, additional supplier related data verification | | | |
| Presentation of the results from day 1 and 2 | | | |

6.2 Description of evaluation activities

In the fourth surveillance audit, attention was focused on practical implementation aspects of the SBP system, review of documents and system, evaluation of input material classification (reception and registration), analysis of the critical control points in existing FSC system and FSC system control points as well as correctness and availability of GHG data.

Description of the fourth surveillance audit evaluation:

All SBP related documentation related to the SBP as well as FSC CoC/ CW system of the organisation, including SBP Procedures, GHG data calculations/ data sheet, Supply Base Reports, Biomass profiling data, Batch specific data, and FSC system description was provided by the company was verified during the audit. Overall changes had been discussed.

Auditors were welcomed in SIA Scandbio Latvia office in Talsi parish. Audit started with an opening meeting attended by the management team of the biomass producer as well as other staff. Auditors introduced themselves, provided information about audit plan, methodology, auditor qualification, confidentiality issues, and assessment methodology and clarified the scope of the audit.

After that auditors went through all applicable requirements of the SBP standards nr.2, 4, 5 and instruction documents 5a,5b and 5c covering input clarification, existing chain of custody and controlled wood system,

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management system, CoC, recordkeeping/mass balance requirements, emission and energy data and categorisation of input and verification of SBP compliant and SBP Controlled feedstock/ biomass. During the process, overall responsible person for SBP system and over responsible staff as well as other staff having responsibilities within the system were interviewed.

During the first day of the audit, roundtrip around BP's pellet production was undertaken. During the site tour reception, recordkeeping, production process was observed, applicable records were reviewed, pellet factory staff was interviewed and FSC system critical control points were analysed. During the trip production technology and information about the main production facilities was presented to the auditors.

As a part of the assessment, 3 secondary feedstock suppliers selected by the auditors were visited; the supplier audit methodology: interviews, document verification, production site visit, report preparation done by the BP was observed and evaluated by the auditor. Number of supplier audits has been calculated based on the equation 0.6 times the square root from the number of suppliers. Total number of suppliers is 19. Those suppliers which were not visited in previous audits were selected for field inspections in this annual surveillance audit.

At the end of the audit, audit findings were summarised and audit conclusion based on use of 3 angle evaluation method were provided during the closing meeting to the overall responsible person, CEO and other responsible staff that have participated in the meeting.

6.3 Process for consultation with stakeholders

Consultation was not conducted for this surveillance audit



7 Results

7.1 Main strengths and weaknesses

Strengths: SBP system elements are implemented at the time of the assessment. Use of the FSC credit system. Effective recordkeeping system. Small number of the management staff and clearly designated responsibilities within the staff members. Experienced and qualified staff. Feedstock delivered with FSC or PEFC certification claim or either FSC Controlled Wood claim. Strong reliance on measurement-based data acquisition and reporting.

Weaknesses: no non-conformities were identified at the time of third annual surveillance audit

7.2 Rigour of Supply Base Evaluation

N/A

7.3 Collection and Communication of Data

The data had been updated and provided prior the surveillance audit and verified and validated at the time of audit. The data is complete, accurate and is based on the records from the internal recordkeeping system.

7.4 Competency of involved personnel

During the audit it was identified that number of staff members are involved into the SBP system management and implementation, including Quality Manager, Director, Logistic Manager/ Office manager, Production manager. Interviewed staff demonstrated awareness of their responsibilities within SBP system. Overall responsible staff was familiar

7.5 Stakeholder feedback

N/A

7.6 Preconditions

N/A



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.

N/A



9 Review of Company's mitigation measures

N/A



10 Non-conformities and observations

Identify all non-conformities and observations raised/closed during the evaluation (a tabular format below may be used here). <u>Please use as many copies of the table as needed</u>. 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.

10.1 Open non-conformities

There are no open non-conformities

10.2 Closed non-conformities

There are no closed non-conformities



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): | Olesja Puiso | |
| Date of decision: | 03/Aug/2019 | |
| Other comments: | Click or tap here to enter text. | |