

# NEPCon Evaluation of GLHU Stolbtsovski Leshoz Compliance with the SBP Framework: Public Summary Report

Scope Change 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](http://www.sbp-cert.org)*

### *Document history*

*Version 1.0: published 26 March 2015*

*Version 1.1: published 30 January 2018*

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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:	17/Oct/2019
Report authors: :	Ondrej Tarabus
Name of the Company:	GLHU Stolbtsovski leshozGLHU Stolbtsovski leshoz
Company contact for SBP:	Shpilevski Genadij, chief engineerShpilevski Genadij, chief engineer
Certified Supply Base: GLHU Stolbtsovski leshoz	sourcing from territory of GLHU Stolbtsovski leshozsourcing from territory of GLHU Stolbtsovski leshoz
SBP Certificate Code:	SBP -01-52
Date of certificate issue:	18/Nov/2016
Date of certificate expiry:	17/Nov/2021

This report relates to the Scope Change Audit

## 2 Scope of the evaluation and SBP certificate

The certificate scope covers production of wood pellets, for use in energy production, at GLHU Stolbtsovski leshoz and transportation by rail to Belarusian/Latvian border, Bigosovo railway station. The scope of the certificate does not include Supply Base Evaluation. The scope includes communication of Dynamic Batch Sustainability Data.

### 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;
- Instruction Document 5D;

## 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)
- SBP Framework Standard 2: Verification of SBP-compliant Feedstock (Version 1.0, 26 March 2015)
- SBP Framework Standard 4: Chain of Custody (Version 1.0, 26 March 2015)
- SBP Framework Standard 5: Collection and Communication of Data (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

GLHU Stolbtsovski leshoz is situated in Stolbtsy District of the western Minsk Region. The enterprise comprises nine forest districts, production (sawmill, pellet production), logging facilities and a base nursery. The company is involved in forestry, wood harvesting, wood machining and trade both within the country and abroad. It is responsible for 90.033 thousand ha of forest territory.

The Organisation holds valid FSC FM/Chain of Custody certificate with FSC transfer system in the scope. The input material used by the Organisation for biomass production contains only secondary feedstock. Forest residues and wood industry residues (slabwood, sawdust) are used for drier. Secondary feedstock (sawdust) is sourced only from own sawmill. Supply Base of GLHU Stolbtsovski leshoz is the only forest area of GLHU Stolbtsovski leshoz.

*Note: The SBR contains in the description of the input material also primary feedstock, however, this is used exclusively in the dryer.*

### 5.2 Description of Company's Supply Base

The supply base of the organization is the total territory of GLHU Stolbtsovski leshoz.

Forests are the dominant vegetation type on the territory of the GLHU «Stolbtsovski leshoz». The structure of the FME includes Okinchitskoe, Opechkovskoe, Prudskoe, Nalibokskoe, Kulskoe, Kletischenskoe, Rubezhevichskoe, Starinskoe and Hotovskoe forestry areas and the logging unit. The FME is located in the western part of the Minsk region, within the Stolbtsy administrative district. The total area of the FME is 90.033 hectares, including 82,855 hectares covered by forest.

Distribution of forests by groups - Group 1 makes 73.9% and Group 2 makes 26.1% (1 – protective forest where some restriction to cut exist and group 2 – economic forest). Distribution by age groups - the young forests make 23.6%, middle forests make 62.6%, maturing forests make 10.1% and over-ripe forests make 3.7%. The distribution by dominant species – coniferous forests make 74.9%, hardwood forests make 0.5% and deciduous forests make 24.6%. Average wood volume is 220 m<sup>3</sup> per hectare. Average age of trees is 54 years. The limit of cutting of mature trees is 67,100 cubic meters, including 34,100 cubic meters for coniferous. They are pine – 22,700 m<sup>3</sup>, spruce – 6,400 m<sup>3</sup>, aspen – 3,000 m<sup>3</sup>, birch – 11,900 m<sup>3</sup>, black alder – 18,100 m<sup>3</sup>. All plots after cutting are planted by trees in the spring or forest plots are left for natural regeneration. All man-made forests are annually under care.

The main objective of forest management in the GLHU «Stolbtsovski leshoz» is to provide the continuous, stable, sustainable, cost-effective, multi-purpose, environmentally responsible and socially oriented forest management that to meet the needs of society in raw materials and to preserve and enhance the ecological functions of forests and to conserve biodiversity in forest ecosystems

For details see the BP website <http://stolbzyles.by/sertifikaciya/>



## 5.3 Detailed description of Supply Base

Total Supply Base area (ha): 90033 ha

Tenure by type (ha): 90033 ha state ownership, 0 million ha private forests and 0 million ha other ownership types.

Forest by type (ha): 90033 ha temperate forests

Forest by management type (ha): 90033 ha managed semi-natural

Certified forest by scheme (ha): FSC - total certified area 90033 ha

PEFC – total certified area 90033 ha

Quantitative description of the Supply Base can be found in the Supply Base Report of the Biomass Producer (<http://stolbzyles.by/sertifikaciya/>)

## 5.4 Chain of Custody system

The Organisation holds valid FSC FM/COC certificate (NC-FM/COC-017322). Critical control points of the FSC CoC system were evaluated also during SBP audit.

The Organisation has implemented FSC transfer system. The input material used by the Organisation for biomass production contains secondary feedstock - sawdust for pellet production, primary feedstock such as forest residues, diseased wood and wood industry residues for dryer. All feedstock is FSC certified and originates only from forest area of the BP



Final meeting 17.00-17:30	Office of GLHU Stolbtsovski leshoz		

## 6.2 Description of evaluation activities

The audit 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 the collection of the energy and emission data.

Description of the audit evaluation:

All SBP related documentation connected to the SBP as well as FSC system of the organisation, including SBP Procedures, GHG related data, Supply Base Reports, were evaluated during the audit.

Auditor was welcomed in the company. Audit started with an opening meeting attended by the chief engineer.

Auditor introduced himself, provided information about audit plan, methodology, auditor qualification, confidentiality issues, and assessment methodology and clarified verification 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 feedstock/ biomass. During the process, overall responsible person for SBP system and as well as other persons having key responsibilities within the system were interviewed.

After that roundtrip around BP's pellet production was undertaken. During the site tour reception process were observed, applicable records were reviewed, pellet factory staff was interviewed and FSC system critical control points were analysed.

At the end of the audit findings were summarised and audit conclusion based on use of 3 angle evaluation method were provided to the representative of the company. After the audit the final review of the SAR document and additional evidence provided by the organization was done. The outcomes of this additional review were discussed with the company over phone.

The scope change audit visit was focused on adding instruction 5D in the scope of certificate.

Description of the audit evaluation:

The responsible for SBP certification has send updated procedure. Auditor went through all applicable requirements instruction document 5D. During the process overall responsible person for SBP system was interviewed via phone.

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## 6.3 Process for consultation with stakeholders

No Consultation was conducted for this surveillance audit

## 7 Results

### 7.1 Main strengths and weaknesses

Strength: Use of production residuals only from own sawmill. All elements of SBP system are implemented. Use of the FSC transfer system and control of all incoming materials at the level of sawdust reception and production process.

Weaknesses: Rotation of staff without proper training of new ones. See the non-conformities below

### 7.2 Rigour of Supply Base Evaluation

Not applicable

### 7.3 Collection and Communication of Data

The BP has system in place of recording of data. The problem only with electricity used for pellet production. The BP has electricity meter, but not use it properly – data not recorded.

### 7.4 Competency of involved personnel

The SBP responsible person in the company is chief engineer. But technical responsible person (which gather data and compile them is certification and standardization engineer. During certification cycle 3-4 persons are changed on this position. The proper training this year was not conducted for new employed person. The engineer has prepared by herself and demonstrated basic understanding of SBP requirements.

### 7.5 Stakeholder feedback

No stakeholder comments were received.

### 7.6 Preconditions

No preconditions to this certification were identified at the time of this surveillance audit

## 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 after 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). 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.

<b>NC number</b> 01/18	<b>NC Grading:</b> Major
<b>Standard &amp; Requirement:</b>	Standard #2: Verification of SBP-compliant feedstock Standard #2: Verification of SBP-compliant feedstock  15.1 The BP shall implement a management and monitoring system to maintain compliance with the requirements of this and all other relevant SBP Standards, together with a process of review and feedback into planning
<b>Description of Non-conformance and Related Evidence:</b>	
<p>The BP responsible staff have updated documented procedures, designated responsibilities among the existing staff. This year new certification and standardization engineer was employed and which is responsible for all technical aspects of SBP certification. This new person was not trained against SBP requirements. The main responsible for SBP certification – chief engineer – is not fully engaged in management of SBP system as required by procedure. The weakness in preparation of SAR, justification of electricity consumption was detected during audit which are results of the weakness in the management system. Ответственные за SBP имеют обновленную процедуру, в которой расписаны ответственные за ее выполнение. В этом году был принят новый человек на должность инженера по стандартизации и сертификации, и который несет ответственность за все технические аспекты выполнения требований SBP. С новым сотрудником не проведено обучение. Основное ответственное лицо за сертификацию – главный инженер – не в полной мере выполняет те функции, которые возложены на него процедурой SBP. Трудности с подготовкой SAR, трудности с обоснованием потребления электричества свидетельствуют о слабости в системе управления SBP сертификацией.</p>	
<b>Timeline for Conformance:</b>	3 months from the report finalisation, 15.11.2019
<b>Evidence Provided by Company to close NC:</b>	Not provided
<b>Findings for Evaluation of Evidence:</b>	The BP has not provided evidence that effective steps were undertaken to close this nonconformance. This year again new certification and standardization engineer was employed, and which is responsible for all technical aspects of SBP certification. This new person was not properly trained against SBP requirements. The



	<p>weakness in preparation of SAR, justification of electricity consumption was detected during audit which are results of the weakness in the management system. Организация не предоставила доказательств, что эффективные шаги были предприняты для закрытия несоответствия. В этом году опять был принят новый человек на должность инженера по стандартизации и сертификации, и который несет ответственность за все технические аспекты выполнения требований SBP. С новым сотрудником должным образом не проведено обучение. Трудности с подготовкой SAR, трудности с обоснованием потребления электричества по прежнему свидетельствуют о слабости в системе управления SBP сертификацией.</p>
<b>NC Status:</b>	Open

<b>NC number</b> 01/19	<b>NC Grading:</b> Major
<b>Standard &amp; Requirement:</b>	<p>Standard #2: Verification of SBP-compliant feedstock Standard #2: Verification of SBP-compliant feedstock</p> <p>15.6 The BP shall implement a management review system, which has the authority to make appropriate improvements to the management system.</p>
<b>Description of Non-conformance and Related Evidence:</b>	
<p>In accordance with p.3.1.1 of the procedure responsible for SBP certification shall do revision of SBP system. Staff interview and documents review showed that proper management review system is not implemented. Chief engineer being main responsible for SBP certification has not provided any evidence that internal inspection/revision of how SBP system work was conducted. As a result, the BP has no good prepared and finalised documents (SAR, procedure etc) at the date of audit, but only draft versions which were finalised during and after audit. В соответствии с п. 3.1.1. процедуры ответственный за SBP сертификацию должен проводить проверки того, как работает система сертификации SBP. Главный инженер, который является ответственным за работу системы сертификации SBP, не предоставил никаких свидетельств того, что проверка работы системы сертификации SBP проводилась. Как результат организация не имела подготовленных финальных документов (таких как SAR, процедура и др) к моменту аудита, а только рабочие версии, которые были завершены как во время аудита, так и после аудита.</p>	
<b>Timeline for Conformance:</b>	3 months from the report finalisation
<b>Evidence Provided by Company to close NC:</b>	Pending
<b>Findings for Evaluation of Evidence:</b>	Pending
<b>NC Status:</b>	Open

<b>NC number</b> 02/19	<b>NC Grading:</b> Major
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<b>Standard &amp; Requirement:</b>	<p>Standard #5: Collection of Data for Energy and Carbon Balance Calculations</p> <p>2.1.3. Each Legal Owner shall operate a management system to ensure that data recorded is consistently compliant with the requirements specified in SBP Standards and Instruction documents</p>
<b>Description of Non-conformance and Related Evidence:</b>	
<p>The BP has management system to record data. The BP has started recording of electricity consumption in October 2018. Records were provided to auditor. But recorded volumes are extremely low. This extremely low volumes were used for preparation of SAR. During revision period no one from management raised concern why electricity consumption is so low. Due to NCR related electricity consumption were raised in 2018 and appear again in 2019 it is show that management system is not implemented properly. Организация имеет систему регистрации данных. Организация начала вести записи потребления электричества с октября 2018 г. Данные были представлены аудитору. Проверка показала, что по записям потребление электричества очень маленькое. Эти данные были использованы организацией для подготовки SAR. Во время ревизионного периода никто из руководства организации не выразил сомнения в том, почему потребление электричества для производства пеллет такое низкое. Т.к. несоответствие по учету потребления электричества подымалось в 2018 г. и появляется вновь в 2019 г., то это свидетельствует, что система контроля за правильностью регистрации данных не внедрена должным образом.</p>	
<b>Timeline for Conformance:</b>	3 months from the report finalisation
<b>Evidence Provided by Company to close NC:</b>	Pending
<b>Findings for Evaluation of Evidence:</b>	Pending
<b>NC Status:</b>	Open

**CLOSED NON-CONFORMANCES**

<b>NC number 02/18</b>	<b>NC Grading: Minor</b>
<b>Standard &amp; Requirement:</b>	<p>Standard #5: Collection of Data for Energy and Carbon Balance Calculations Standard #5: Collection of Data for Energy and Carbon Balance Calculations</p> <p>3.1.1. BPs shall record data in an 'SBP Audit Report for Energy and GHG data' (SAR), using the latest version of the template from the SBP website. The SAR shall be complemented with validation comments and photographs from a CB</p>
<b>Description of Non-conformance and Related Evidence:</b>	
<p>The BP has recorded data and submitted to auditor. The BP has used old template. Организация подготовила SAR, однако использовала старый шаблон.</p>	

<b>Timeline for Conformance:</b>	By the next surveillance audit, but no later than 12 months from report finalisation date By the next surveillance audit, but no later than 12 months from report finalisation date
<b>Evidence Provided by Company to close NC:</b>	SAR
<b>Findings for Evaluation of Evidence:</b>	The BP has recorded data and submitted to auditor. The BP has used latest template.
<b>NC Status:</b>	Closed

## 11 Certification decision

<b>Based on the auditor’s recommendation and the Certification Body’s quality review, the following certification decision is taken:</b>	
<b>Certification decision:</b>	Certification approved
<b>Certification decision by (name of the person):</b>	Pilar Gorría Serrano
<b>Date of decision:</b>	17/Oct/2019
<b>Other comments:</b>	SAR is not approved due to inconsistent electricity data. See Major NCRs related