

# SBP

Sustainable Biomass Partnership

# NEPCon Evaluation of BIOMASA FORESTAL, S.L. Compliance with the SBP Framework: Public Summary Report

## First Surveillance Audit

[www.sustainablebiomasspartnership.org](http://www.sustainablebiomasspartnership.org)



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

*For further information on the SBP Framework and to view the full set of documentation see  
[www.sustainablebiomasspartnership.org](http://www.sustainablebiomasspartnership.org)*

### *Document history*

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# 1 Overview

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

Primary contact for SBP: Ondrej Tarabus, Programme Manager [ot@nepcon.net](mailto:ot@nepcon.net)

Report completion date: 16/Mar/2017

Report authors: Pilar Gorriá Serrano, Lead auditor

Certificate Holder: BIOMASA FORESTAL S.L. Polígono Industrial de Penapurreira. Parcela C3 - A  
As Pontes, 15320. Spain

Producer contact for SBP: María Vázquez, Plan Manager and product certification responsible,  
[maria.vazquez@grupogestan.net](mailto:maria.vazquez@grupogestan.net)

Certified Supply Base: Galicia, Asturias and León

SBP Certificate Code: SBP-01-17

Date of certificate issue: 10/May/2016

Date of certificate expiry: 09/May/2021

Indicate where the current audit fits within the certification cycle				
Main (Initial) Audit	First Surveillance Audit	Second Surveillance Audit	Third Surveillance Audit	Fourth Surveillance Audit
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 2 Scope of the evaluation and SBP certificate

The certificate scope covers the production site in As Pontes, Galicia – Spain.

The Organisation holds valid PEFC and FSC Chain of Custody certificate with PEFC and FSC controlled sources in the scope. Both certificates cover the pellet production.

Until 2015 the Organisation was sourcing logs from different suppliers, from 2016 the organisation has only one supplier that is supplying all the material used for pellets production. In the purchase agreement, the supplier agrees to source 70% of the material as “PEFC 100% Certified” in the first year and upgrade this amount up to 80% in the consecutive year. This year the BP has been certified also in FSC COC (AEN-COC-000143) and the supplier has not supplied exclusively PEFC certified material but FSC 100% and feedstock with double certification PEFC 100% and FSC 100%.

Secondary feedstock: sawdust and, sawmill residues is used for the pellet production but only in a very small percentage. The CP has decided to not include this material as feedstock due to the difficulties to ensure the origin at the FMU level. As result, secondary feedstock has only been sourced during the first months of 2016 and the total amount in the reporting period has decreased from 10% in 2015 to less than 2% in 2016.

Tertiary feedstock and other waste wood is used for drying only (back, branches and post-consumer pallets)

All inputs material delivered to the pellet production plant are covered by their PEFC&FSC CoC and classified as PEFC certified, FSC certified, FSC&PEFC Certified or PEFC Certified sources.

Scope description: Production of wood pellets, for use in energy production, at BIOMASA FORESTAL S.L. and transportation to Puerto de Ferrol and different ports in UK. The scope of the certificate does not include Supply Base Evaluation.

Scope of the evaluation is indicated in the table below:

Scope Item	Check all that apply to the Certificate Scope		Change in Scope (N/A for Assessments)
<b>Approved Standards:</b>	SBP Standard #2 V1.0 SBP Standard #4 V1.0 SBP Standard #5 V1.0 <a href="http://www.sustainablebiomasspartnership.org/documents">http://www.sustainablebiomasspartnership.org/documents</a>		<input type="checkbox"/>
<b>Primary Activity:</b>	Pellet producer		<input type="checkbox"/>
<b>Input Material Categories:</b>	<input checked="" type="checkbox"/> SBP-Compliant Primary Feedstock	<input checked="" type="checkbox"/> SBP-Compliant Secondary Feedstock	<input type="checkbox"/>
	<input checked="" type="checkbox"/> Controlled Feedstock	<input type="checkbox"/> SBP non-Compliant Feedstock	

	<input type="checkbox"/> SBP-Compliant Tertiary biomass		<input type="checkbox"/> Post-consumer Tertiary Feedstock		
	<input type="checkbox"/> SBP-approved Recycled Claim		<input type="checkbox"/> Post-consumer Tertiary Feedstock		
<b>Chain of custody system implemented:</b>	<input checked="" type="checkbox"/> FSC	<input checked="" type="checkbox"/> PEFC	<input type="checkbox"/> SFI	<input type="checkbox"/> GGL	<input checked="" type="checkbox"/>
	<input type="checkbox"/> Transfer		<input type="checkbox"/> Percentage	<input checked="" type="checkbox"/> Credit	<input type="checkbox"/>
<b>Points of sales</b>	<input checked="" type="checkbox"/> Harbour – Permanent storage (Storage site)		<input type="checkbox"/> Harbour – Temporarily storage (Logistic site)	<input type="checkbox"/> Other point of sale (e.g. gate of the BP, boarder, railway station etc.)	<input type="checkbox"/>
	- Ferrol Harbour. - -		- - -	- - -	
<b>Use of SBP claim:</b>	<input checked="" type="checkbox"/> Yes		<input type="checkbox"/> No		<input type="checkbox"/>
<b>SBE Verification Program:</b>	<input type="checkbox"/> Low risk sources only		<input type="checkbox"/> Sources with unspecified/ specified risk		<input type="checkbox"/>
	New districts approved for SBP-Compliant inputs:				
<b>Sub-scopes</b>					<input type="checkbox"/>
Specify SBP Product Groups added or removed:					
Comments: In 2016 the BP has been FSC COC certified.					

### 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 PEFC&FSC system control points, analysis of the existing PEFC&FSC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients;
- Energy data collection analysis;



## 4 SBP Standards utilised

### 4.1 SBP Standards utilised

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

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

Collection and Communication of Data, SBP Standard 5, Version 1.0, March 2015

Instruction document 5A Collection and Communication of Data version 1.1. October 16

Instruction Document 5B: Energy and GHG Data version 1.1. October 16

Instruction Document 5C: Static Biomass Profiling Data version 1.1. October 16

<http://www.sustainablebiomasspartnership.org/documents>

### 4.2 SBP-endorsed Regional Risk Assessment

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

## 5 Description of Biomass Producer, Supply Base and Forest Management

### 5.1 Description of Biomass Producer

The organization is included in a group of companies GRUPO GESTAN that groups entities with different activities such as waste management, water management, environment and energy consultancy.

Since March 2016 all material is primary feedstock. Previous months from January to March, the BP has purchase 1.600 tn of secondary feedstock with is 2% of the total. The BP has used pallets, bark and other residues in the dryer.

The reporting period is the calendar year 2016. During the reporting period the organization used only one supplier for primary material. In the beginning of 2016 there was also accepted some secondary feedstock material from other suppliers but this was just to allow to these suppliers find another destiny to these secondary outputs.

The BP has an agreement with a sole raw material supplier that is both PEFC and FSC certified. This agreement establishes that at least 70% of the raw material supplied in 2016 must be certified. This ratio will increase to reach 80% of certified raw material in the following year.

Biomasa Forestal has one production line for pellets production, the production can produce both domestic and industrial pellets. The organization is certified in carbon footprint and EPlus.

In the dryer, Biomasa Forestal use 63% of bark from internal and external sources and recycled material (37%) from pallets, forest residues and other residues.

Pellets are sold in Galicia, "Puerto de Ferrol" under FPB conditions.

### 5.2 Description of Biomass Producer's Supply Base

Supply Base of Biomasa Forestal is the region of Galicia, Asturias and León in the north west of Spain.

The raw material used by Biomasa Forestal for the production of pellets comes only from Spain. Around 80% of the raw material comes from the Autonomous Community of Galicia, around 20% comes from Asturias and around 0.5% comes from Leon.

Forest area in Spain occupies 54.8% of its territory, 27.7 M ha. Spain has the third largest extension of wooded area in the EU, with 18.4 M is equivalent to 36.3% of its national territory and forest an area of 0.4 hectares per capita. Furthermore, the surface is treeless in Spain 9.3 M ha, covering 18.5% of the national area.

According to the Fourth National Forest Inventory, published by the Ministerio de Agricultura, Alimentación y Medio Ambiente (Department of Agriculture and Environment), the Galician forest area has barely suffered any changes in the last thirteen years. The region has over 2 million hectares of forest area, 70 % of which is tree-covered. In addition, there are 600,000 hectares susceptible of becoming productive. If we look into land ownership, the following graph shows that 66% of Galician forests are Private and belong to individuals, 33% are Private and

belong to neighbourhoods and the remaining 1% is Public. According to last year's data, forest certification is significantly growing (16%) in privately managed forests in Galicia: PEFC (87,532 ha) and FSC (27,505 ha).

Forest area in Asturias according to the Fourth National Forest Inventory (MAGRAMA 2011) is 770.000 has with around 60% of woodland. Around 38% correspond to public land and 61% is private and 0.2 community land. The main species distribution according to the same national inventory is: 18% *Castanea sativa*, 15 % *Fagus sylvatica*, 10% different *Quercus* species and 10% different *Pinus* species.

Castilla y Leon, with less representation in the Supply Base of Biomasa Forestal. The total tree-covered area in the region has increased by 40% in recent years. The forest area in this region amounts to 4,815,357 hectares, 1,000,000 of which are in the province of León. The tree-covered area represents 61% of it (almost 3,000,000 hectares). If we look into ownership, 35% of the forest is Public and 65% is Private. <http://www.bioforestal.es/wp-content/uploads/2017/02/supply-base-report-template-REV-4.pdf> Detailed description of Supply Base

- a) Total Supply Base area (ha): 2,400,000 hectares (80% Galicia, 19,5% Asturias, 0,5% León)
- b) Tenure by type (ha): 99% Privately owned and 1% Public owned
- c) Forest by type (ha): 100% Temperate
- d) Forest by management type (ha): 2,000,000 ha Plantation/ 400,000 ha Managed Natural
- e) Certified forest by scheme (ha): 45,000 hectares of FSC and 192,666 ha of PEFC-certified forest

Quantitative description of the Supply Base can be found in the Supply Base Report of the Biomass Producer. <http://www.bioforestal.es/wp-content/uploads/2017/02/supply-base-report-template-REV-4.pdf>

## 5.3 Chain of Custody system

Origination holds a valid PEFC&FSC Chain of Custody with PEFC&FSC Controlled sources in the scope of the certificate. Critical control points of the PEFC&FSC CoC system were evaluated also during the SBP audit.

Organisation has implemented credit system with 3 different credit accounts. All the input material is received either with PEFC Certified, FSC Certified or FSC&PEFC Certified claims or the material is covered by organisation's own controlled sources verification system. The organization does not use any imported material. Incoming wood reception register and supplier list are maintained. All material is checked during the arrival and correctly recorded in the internal system. No physical separation is needed. Based on the proportion of certified and controlled wood material the proportion of the SBP-compliant and SBP-controlled biomass is calculated.

## 6 Evaluation process

### 6.1 Timing of evaluation activities

The assessment was carried out on 22th and 23th February 2017. Two days were needed for the onsite audit and two additional days for the documentation review.

Activity	Location	Auditor(es)	Date/time
Opening meeting*	Office	PGS	22/02/2017  12:00
Documents and procedures revision. Feedstock revision.  (Supply Base Report, Quality management, training, internal audits, Comments and complains, etc.)	Office	PGS	12:30 – 14:00
Lunch		PGS	14:00 – 15:00
Interviews with purchase responsible staff. SD2 + feedstock groups in SAR	Purchase department	PGS	15:00 – 17:00
Sustainability data and calculations – SAR	Office	PGS	23/02/2017  9:00 – 11:30
CoC – STD 4 (on site visit to facilities); Interviews with staff - material entrance point	Production facilities  Office	PGS	11:30 – 13:30
Lunch			13:30 – 14:30
On site visit – storage	Feedstock warehouse	PGS	14:30 – 16:00
Profiling information – Sales	Office	PGS	16:00 – 17:00
Auditor internal meeting	Office	PGS	17:00 – 17:30
Closing meeting	Office	PGS	17:30 – 18:00

Estimated time to finish the audit	Office	PGS	18:00
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## 6.2 Description of evaluation activities

Composition of audit team:

Auditor(s), roles	Qualifications
Pilar Gorría Serrano, Spain	Pilar is a forestry engineer from the University of Madrid. Part of her studies took place at the Forestry Research National Center-BFV in Vienna, where she explored carbon soil emissions in commercially managed forests. He has participated as lead auditor in several FSC FM, FSC CoC, PEFC CoC, SBP and Carbon Footprint assessments and audits in Spain and Portugal.

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 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&PEFC system and FSC&PEFC system control points as well as GHG data availability, efforts to meet issued NCRs.

Description of the audit:

Audit started with an opening meeting attended by the SBP responsible person/Production manager of the organization.

Auditor introduced her self, provided information about audit plan, methodology, confidentiality issues, and assessment methodology and clarified certification scope.

After that auditor went through all applicable requirements of the SBP standards nr.2, 4, 5 and instruction document 5a, b and c 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 biomass.

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

At the end of the audit finding were summarised and audit conclusion based on use of 3 angle evaluation method were provided to the Production manager & SBP responsible person.

## 6.3 Process for consultation with stakeholders

No Consultation was conducted for this surveillance audit.

## 7 Results

### 7.1 Main strengths and weaknesses

**Strengths:** The BP has implemented a robust system in collaboration with its supplier to obtain information about the origin and the harvesting practices used in the forest that is considered as a substantial difference from the previous assessments. Currently, the BP has evidences/tools at the forest level that allows them to take management decision about the harvesting practices that they want to sources from.

One of the main strengths of the BP is that in this first annual audit 71% of the feedstock comes with a Forest Certification Claim and is considered as SBP compliant.

**Weaknesses:** See NCRs and OBSs. From a sustainability perspective, the decision to remove secondary feedstock from production is considered a weakness, see details and justification in this report.

### 7.2 Rigour of Supply Base Evaluation

Not applicable

### 7.3 Compilation of data on Greenhouse Gas emissions

SAR completion has been done according to the standard and no NCR have been issued.

### 7.4 Competency of involved personnel

During the annual audit, it was identified that number of staff members are involved into the SBP system management and implementation. Interviewed staff demonstrated awareness of their responsibilities within SBP system. Overall responsible staff was familiar with the SBP requirements.

### 7.5 Stakeholder feedback

No stakeholder comments are received

### 7.6 Preconditions

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

## 8 Review of Biomass Producer's Risk Assessments

Not applicable



## 9 Review of Biomass Producer's mitigation measures

Not applicable

## 10 Non-conformities and observations

<b>NCR: 01/17</b>	<b>NC Classification: minor</b>
<b>Standard &amp; Requirement:</b>	SBP Standard 2C requirement 5.2.
<b>Description of Non-conformance and Related Evidence:</b>	
No updates other than actual and project values of feedstock have been included in the SBR; however, the BP has face some changes that shall be described in the SBR, such as: the new FSC Chain of Custody certification, the purchase of FSC certified and FSC&PEFC certified feedstock, the decision to not purchase secondary feedstock from May 2016 due to the difficulties to carry out sub-supplier audits or the decision to exclude extra-size material from pellets production <a href="http://www.bioforestal.es/wp-content/uploads/2017/02/supply-base-report-template-REV-4.pdf">http://www.bioforestal.es/wp-content/uploads/2017/02/supply-base-report-template-REV-4.pdf</a>	
<b>Corrective action request:</b>	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
<b>Timeline for Conformance:</b>	By the next annual surveillance audit, but not later than 12 months from report finalisation date
<b>Evidence Provided by Organisation:</b>	PENDING
<b>Findings for Evaluation of Evidence:</b>	PENDING
<b>NCR Status:</b>	<b>OPEN</b>

<b>NCR: 02/17</b>	<b>NC Classification: minor</b>
<b>Standard &amp; Requirement:</b>	SBP Standard 4 requirement 5.5.2.
<b>Description of Non-conformance and Related Evidence:</b>	
Claim used in sales documents is “SBP compliant” the BP has not used the complete claim “SBP compliant biomass”.	
<b>Corrective action request:</b>	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
<b>Timeline for Conformance:</b>	By the next annual surveillance audit, but not later than 12 months from report finalisation date
<b>Evidence Provided by Organisation:</b>	PENDING
<b>Findings for Evaluation of Evidence:</b>	PENDING
<b>NCR Status:</b>	<b>OPEN</b>

<b>OBS: 01/17</b>	<b>Standard &amp; Requirement:</b>	SBP Standard 5B requirement x 6.1.4.
	<b>Report Section</b>	Appendix C p 16.4.
<b>Description of findings leading to observation:</b>	<p>Vehicles used for pellets transport in some trips return to the BP empty but in other occasions bring material for the boiler. No evidence of such travel has been found.</p> <p>The SAR document reports the distance from the BP to the port considering a single way, to avoid confusion the distance is also shown on the map.</p>	
<b>Observation:</b>	The BP should consider record evidences to justify in case where trucks come back from the port with other load and then distance can be only applicable as one way.	

<b>OBS: 02/17</b>	<b>Standard &amp; Requirement:</b>	SBP Standard 5A requirement 4.5.5.
	<b>Report Section</b>	Appendix C p 12.5.
<b>Description of findings leading to observation:</b>	<p>According to the information provided by the SBR the BP uses material whose purpose is to end up in a sector other than energy sector (furniture, board, paper sectors, etc.) but residues from harvesting operation or low quality wood as tree tops, sanitary cuttings, thinnings, etc are purchased by the BP. The main supplier also informed the auditor than final cuts provided to the BP are from species as Pinus pinaster, with harvest rotation less than 40 years, bibliography also support with information.</p> <p>The main evidence to verify the harvesting practices used in the forest was the harvesting permit.</p> <p>From the sample reviewed during the audit it was found that in one truck of <i>Castanea Sativa</i>, the harvesting permit is only issued to harvest the pine (burned wood) and it is expressly prohibited to harvest any other species.</p> <p>Note: During the audit an interviewed with the supplier (with FM certification code GFA-FM/COC-002537) was conducted and auditor was informed that in this case forest administration allowed in the field to cut all the trees non-included in the harvesting permit. No evidences further than supplier interviews were provided.</p>	
<b>Observation:</b>	The BP should review the harvesting permits not only for origin definition purposes but to ensure that all the material sourced correspond to their purchase policies: only the material legally harvested is purchased, only material with harvesting rotation period < 40 years, etc.	

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

Note: use NCR numbers:

## 11 Certification decision

<b>Based on Organisation's conformance with SBP requirements, the auditor makes the following recommendation:</b>	
<input checked="" type="checkbox"/>	Certification approved: Upon acceptance of NCR(s) issued above
<input type="checkbox"/>	Certification not approved:
<b>Based on auditor's recommendation and NEPCon quality review following certification decision is taken:</b>	
<b>NEPCon certification decision:</b> Certification is maintained upon acceptance of NCRs raised in this report.	
<b>Certification decision by: Ondřej Tarabus</b>	
Date of decision: <b>16/03/2017</b>	
<b>Next surveillance audit should take place:</b>	<input checked="" type="checkbox"/> within 12 months <input type="checkbox"/> more frequently (please specify)

## 12 Surveillance updates

### 12.1 Evaluation details

Please see in a section: p.6.2. Description of evaluation activities

### 12.2 Significant changes

Organization has been FSC CoC Certified since the assessment.

Secondary feedstock: sawdust and, sawmill residues is used for the pellet production but only in a very small percentage. The BP has decided to exclude this material as feedstock due to the difficulties to ensure the origin at the FMU level. As a result, secondary feedstock has only been sourced during the first months of 2016 and the total amount in the reporting period has decreased from 10% in 2015 to less than 2% in 2016.

### 12.3 Follow-up on outstanding non-conformities

<b>NCR: 01/16</b>	<b>NC Classification: minor</b>
<b>Standard &amp; Requirement:</b>	SBP Standard # 2 requirement 6.1.
<b>Report Section:</b>	Appendix A p 1.2.
<b>Description of Non-conformance and Related Evidence:</b>	
<p>Organisation used delivery notes to record the place of harvesting. These documents, include the information about the type of material and species (Pinus or various). Place of harvesting is mentioned as the municipality and only in case of PEFC Certified inputs reference to the FMU identification is provided. In 2016 at least 70% of the material will be PEFC Certified and in 2016, 80% with information about the FMU identification in the delivery notes.</p> <p>Biomasa Forestal shall record the place of harvesting for all the primary feedstock. Currently, for non-certified material only municipality level is record (which provides the assurance that the material comes within defined SB) but FMU level is requested only for PEFC certified material.</p>	
<b>Corrective action request:</b>	<p>Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>
<b>Timeline for Conformance:</b>	By the next annual surveillance audit
<b>Evidence Provided by Organisation:</b>	<p>Records of delivery notes with information at the FMU level.</p> <p>FMU level is recorded for each truck at the entrance point.</p>
<b>Findings for Evaluation of Evidence:</b>	<p>The BP record the province, municipality and cadastral parcel (FMU level) for each truck at the entrance point. This procedure has been implemented since May.</p> <p>As of May 2017, the organization has obtained information at the FMU level from the supplier's purchase documents (delivery</p>

	<p>notes and harvesting permits). This information is available at the UGF level in 98.7% of the material. The remaining 1.3% are forest management certificates of groups in which the supplier has yards where the material is stored as an intermediate point and mixes wood from different UGFs from the same municipality. In these cases, the origin is assured at the municipality level which is clearly covered by the supply base.</p>
<p><b>NCR Status:</b></p>	<p><b>CLOSED</b></p>
<p>Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>


<b>NCR: 02/16</b>	<b>NC Classification: minor</b>
<b>Standard &amp; Requirement:</b>	SBP Standard # 2 requirement 6.2.
<b>Report Section:</b>	Appendix A p 1.3.
<b>Description of Non-conformance and Related Evidence:</b>	
<p>Biomasa Forestal keeps records of the origin in the IT System LIBRA. The secondary feedstock origin is not known at the level of the harvesting place. The origin known is the sawmill-supplier location, based on delivery notes.</p> <p>Prior to close this report the organisation has develop additional documents:</p> <ul style="list-style-type: none"> <li>• Procedure IT SBP 5.1.1. “Feedstock traceability” where is stated that to ensure place of harvesting of secondary feedstock, origination will ask the supplier to provide the information detailed in Annex 1. This information will be confirmed through internal audits.</li> <li>• Annex I. “Cuestionario proveedores material prima secundaria” is a survey to be filled by the secondary feedstock suppliers with information about: municipality of harvesting, type of material processed, species and other info.</li> <li>• Internal supplier audit program has been prepared with specific audit report template (see internal procedure Anexo2. “Informe auditoria suministradores de material prima secundaria”).</li> </ul> <p>Place of harvesting of secondary feedstock couldn’t be confirmed during the assessment because this procedure described above has not been implemented yet. The effectiveness of the action implemented by the organisation will be evaluated in the next annual audit.</p>	
<b>Corrective action request:</b>	<p>Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>
<b>Timeline for Conformance:</b>	By the next annual surveillance audit
<b>Evidence Provided by Organisation:</b>	Feedstock material records in LIBRA system. No secondary feedstock from May 2016.
<b>Findings for Evaluation of Evidence:</b>	<p>Internal procedures include the internal audits implementation at sub-supplier’s level (primary processor), to verify the forest origin for the secondary material.</p> <p>In spite of this, during conversation between the BP and the supplier, considering that secondary feedstock only accounts for 10% of the total feedstock, it was decided that the most cost and time effective will be to exclude this material instead of carry out the internal audits at the sawmills. Thus, it was decided to source only primary feedstock.</p> <p>In the reporting period, 1.668 tn of secondary feedstock were purchased, accounting for around 2%. Entries have been made until May 2016 and since May, none secondary has been procured.</p> <p>The internal procedure about the sub-supplier audit is maintained in case an interest or demand occurs in the future to collect info about origin or species of secondary material.</p>

	<p>During the audit, it was mentioned that more secondary feedstock should be available to compensate the efforts made with the sub-supplier's audits.</p> <p>As no secondary feedstock is included from May 2016, the NCR about the identification of origin of this material is considered to be closed.</p>
<p><b>NCR Status:</b></p>	<p><b>CLOSED</b></p>
<p>Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>



<b>NCR: 05/16</b>	<b>NC Classification: Minor</b>	
<b>Standard &amp; Requirement:</b>	SBP Standard # 4 requirement 6.1.	
<b>Report Section:</b>	Appendix B p 6.1	
<b>Description of Non-conformance and Related Evidence:</b>		
Standard requires to use the latest version of the standard nr.5. This requirement has been applied for this assessment (using the valid standard version) but the update in the future this the latest version is not clearly designated in the BP procedures. Requirement for the procedure review is stated in the procedures		
<b>Corrective action request:</b>	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.	
<b>Timeline for Conformance:</b>	By the next annual surveillance audit	
<b>Evidence Provided by Organisation:</b>	Procedures implemented according to the new version of STD 5 and STD5. Instructions. Pag 16 of the SBP manual includes this requirement.	
<b>Findings for Evaluation of Evidence:</b>	Audit was conducted using the updated version of the STD 5 and the BP has implemented it.	
<b>NCR Status:</b>	<b>CLOSED</b>	
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

<b>NCR: 06/16</b>	<b>NC Classification: minor</b>	
<b>Standard &amp; Requirement:</b>	SBP Standard # 4 requirement 4B, 3.1., 3.3., 3.4.	
<b>Report Section:</b>	Appendix B p 9.13., 9.15., 9.16	
<b>Description of Non-conformance and Related Evidence:</b>		
SBP logo artwork is slightly covered in section 6 of the SBP procedures. The following requirements are missing:		
<ul style="list-style-type: none"> <li>• The SBP logo artwork may be used only in landscape and horizontal alignment</li> <li>• When used on a non-white background a white space must be retained around the SBP logo artwork to clearly differentiate it from the background</li> <li>• There are some points don't allowed: a) change color, transparency or proportions, b) Making the SBP logo art work appear to be part of other information such as environmental claims not relevant to SBP certification. c) Making the SBP logo art work appear to be part of other information such as environmental claims not relevant to SBP certification. d) Rotating the SBP logo art work to anything other than a horizontal alignment</li> </ul>		

<b>Corrective action request:</b>	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
<b>Timeline for Conformance:</b>	By the next annual surveillance audit
<b>Evidence Provided by Organisation:</b>	Promotional trademark use on the website. SBP manual. Section 6. Communication sent with SBP staff about the logo use in November 2016.
<b>Findings for Evaluation of Evidence:</b>	Internal procedures in section 6 includes SBP standard logo requirements. Mono colour of SBP logo used in the website has been reviewed by SBP. In this website only one colour is available according to the design and style of the BP website.
	
<b>NCR Status:</b>	<b>CLOSED.</b>
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

<b>NCR: 07/16</b>	<b>NC Classification: minor</b>
<b>Standard &amp; Requirement:</b>	SBP Standard # 5 requirement 5a, 3.1.1.
<b>Report Section:</b>	Appendix C, 4.1.1.
<b>Description of Non-conformance and Related Evidence:</b>	
<p>The BP is applying EC and UK feedstock classification. The classification is mentioned in the GHG and profiling information under the section feedstock used.</p> <ul style="list-style-type: none"> <li>• According to EC classification: Material is classified as steam wood and wood industry residues.</li> <li>• According to UK classification: Long rotation forestry (conifer) with less than 40 years, sawdust, sawmill residues and slab wood.</li> <li>• Waste wood and bark are also used for the dryer.</li> </ul> <p>During the warehouse visit, the following feedstock material was found:</p> <p>a) Wood classified by the BP as extra-size with diameters bigger than 40 cm. It can be hardly used for other productive purposes but biodiversity uses of this material if it is left in the forest could be considered. This material has not been used for pellets production during 2015 because the BP needs to outsource special equipment to cut and chip this material and enter into the pellets production process. The material is too big and the BP has not equipment to work with. After the field work the BP has sent a procedure to remove this material from the BP yard and do not use for pellet production. The procedure will be</p>	

<p>handled by a topographer who will measure the total amount of material and it will be sold as row material to customers.</p> <p>b) Currently for this reporting period all the material has been classified as final felling because the BP has not enough evidences to justify that some material could be classified as forest residues from thinning or tree tops. The BP decided to classify all the primary feedstock as final felling applying a conservative approach.</p> <p>The BP aims to agree with the supplier that in the next delivery notes, the supplier will indicate if the wood comes from a final felling or thinning, using the information provided in the harvesting permit. Currently, at the moment of finish this report a more accurate classification of the row material shall be needed to comply with SBP requirements.</p> <p>Taken into account the material evaluated in the company yard and the conservative approach established by the company, auditor considers this lack of classification as minor NCR.</p>	
<b>Corrective action request:</b>	<p>Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>
<b>Timeline for Conformance:</b>	By the next annual surveillance audit
<b>Evidence Provided by Organisation:</b>	<p>Internal procedures</p> <p>Topographic report with big-size wood storage</p> <p>Harvesting permits with information about the harvesting operation: final felling, thinning, etc.</p> <p>LIBRA system with records about the harvesting operation by each truck.</p>
<b>Findings for Evaluation of Evidence:</b>	<p>Despite the fact, that with the new standard 5 the classification requirements have been changed, the BP has implemented the following actions to avoid the use of extra-size wood into the pellets production and differentiate the harvesting operations:</p> <p>a) Extra-size wood bigger than 40 cm that existed in the feedstock warehouse during the last assessment was chipped by the supplier and sold to the same supplier in chip form. This amount was 2.081 tn for the last reporting period and has been discounted from the calculation of feedstock consumption. Topographic measurements done last 23<sup>th</sup> March 2016, by the topographer Jose Antonio Seoane Ferreiro (professional number, 1409) showed that the amount was 2.236tn (the volume was 3.399 m<sup>3</sup> with a density of 0.66). Final sales of chip dried was 1.063 tn.</p> <p>b) The BP has agreed with the supplier to include information about harvesting operations in the delivery documentation and the harvesting permits. This information is saved in LIBRA system for sustainability and calculation purposes.</p>
<b>NCR Status:</b>	<b>CLOSED</b>
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>

<b>NCR: 08/16</b>	<b>NC Classification: minor</b>	
<b>Standard &amp; Requirement:</b>	SBP Standard # 5 requirement 5a, 3.7.1.	
<b>Report Section:</b>	Appendix C, 4.7.1	
<b>Description of Non-conformance and Related Evidence:</b>		
<p>For primary feedstock (more than 80% of the total feedstock received) diesel used for haulage is calculated based on capacity of the trucks, total tonnes of feedstock from the forest and the distance. In case of distances, the company has developed a case of study during 5 months in 2015 where it is calculated the following: Origin of feedstock is classified in 3 different categories based on distance and the relevant number of travels area allocated in each category. A weight average is used to calculate the final data for the distance and a conservative value of 80 km is used for GHG calculation (the result of the calculation was a bit lower).</p> <p>By the assessment field work, the BP didn't included the energy used in the haulage of secondary feedstock and bark to the pellet plant. Before closing this report, the BP has included these data. The distance used is also 80km/one way and the specific diesel used has been added. The auditor keep a minor NCR open connected with secondary feedstock and the bark. It will be necessary to verify these data with the relevant evidences in the next annual audit.</p>		
<b>Corrective action request:</b>	<p>Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.                  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>	
<b>Timeline for Conformance:</b>	By the next annual surveillance audit	
<b>Evidence Provided by Organisation:</b>	Distances applicability has changed with the STD 5 Interpretation.	
<b>Findings for Evaluation of Evidence:</b>	<p>The NCR is no more applicable with in the new rules and the distances requirement were evaluated according the new instructions within each group of feedstock.</p> <p>During the annual audit, it was found conformity regarding the distance indicators and the information provided in SAR, thus this NCR is considered closed.</p>	
<b>NCR Status:</b>	<b>CLOSED</b>	
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

<b>NCR: 09/16</b>	<b>NC Classification: minor</b>	
<b>Standard &amp; Requirement:</b>	SBP Standard # 4 requirement 5.4.2.	
<b>Report Section:</b>	Appendix B, 4.2.	
<b>Description of Non-conformance and Related Evidence:</b>		
<p>Organization keeps records of all the customers to which it supplies biomass but the specific requirement of record the certificate number is not yet implemented in the system</p>		

<b>Corrective action request:</b>	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
<b>Timeline for Conformance:</b>	By the next annual surveillance audit
<b>Evidence Provided by Organisation:</b>	Records and sales during the reporting period. DTS records.
<b>Findings for Evaluation of Evidence:</b>	The BP has done SBP sales to one customer that was not SBP certified yet. The customer was a trader that is currently under SBP Certification process. The quality manager shown the record of the DTS transactions from December 22 <sup>th</sup> , 2016 and January 5 <sup>th</sup> , 2017. Until now there was no SBP sales to SBP clients. The quality manager has shown good knowledge about the requirement implementation and the NCR can be closed.
<b>NCR Status:</b>	<b>CLOSED</b>
Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

## 12.4 New non-conformities

See section 10 in this report NCR 01/17 and NCR 02/17 have been identified as well as two OBS.

## 12.5 Stakeholder feedback

No comments or comments from the stakeholders had been received.

## 12.6 Conditions for continuing certification

No preconditions are identified. List of open NCR is available in section 10. Non-conformities and observations of the report.

## 12.7 Certification recommendation

It is recommended to maintain certification of the organisation.

## 13 Evaluation details

Primary Responsible Person: (Responsible for control system at site(s))	María Vazquez, Quality Manager
Auditor(s):	Pilar Gorriá Serrano - Lead Auditor.
People Interviewed, Titles:	María Vazquez, Quality Manager Ainhoa Sanjurjo, Administration Jose Castro, Jefe de Turno Supplier staff.
Brief Overview of Audit Process for this Location:	See in section 6.2, Description of evaluation activities in the main part of the report.
Comments:	N/A