

# NEPCon Evaluation of Trans-Siberian Forest Company Ltd Compliance with the SBP Framework: Public Summary Report

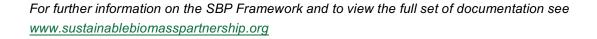
First Surveillance Audit

www.sustainablebiomasspartnership.org





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



Document history

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### Overview

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

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

03/Oct/2017 Report completion date:

Report authors: Nikolai Tochilov, Natalia Zaladinova, Roman Kurakin (annual audit)

Nikolai Tochilov (corrective action verification audit)

Certificate Holder: Trans-Siberian Forest Company Ltd. (former Siberian Wood Pellets Ltd. - Ust-

Kut production site)

Legal address: Russian Federation 664011, Irkutsk, Rabochaya street bld. 2A,

office 411

Production site location: Russian Federation, Irkutsk region, Ust-Kut town, Tolstyi

Cape area

Producer contact for SBP: Mikhail Minaev certification responsible. Tel.: +79041497881; Email:

minaev@rusles.ru

Certified Supply Base: Sourcing from Russia, Irkutsk region

SBP Certificate Code: SBP-01-27

Date of certificate issue: 13/Aug/2016

Date of certificate expiry: 12/Aug/2021

| Indicate where the current audit fits within the certification cycle |                                |                                 |                                |                                 |
|--|--------------------------------|---------------------------------|--------------------------------|---------------------------------|
| Main (Initial)<br>Audit  | First<br>Surveillance<br>Audit | Second<br>Surveillance<br>Audit | Third<br>Surveillance<br>Audit | Fourth<br>Surveillance<br>Audit |
|  | X                              |                                 |                                |                                 |



#### Scope of the evaluation and SBP certificate 2

The certificate scope covers the production site and office facilities in Ust-Kut, Irkutsk region.

The Organisation holds valid FSC Chain of Custody and FSC Controlled wood certificate, covering pellet production at two sites - Ust-Kut and Novaya Igirma - in Irkutsk region, Russia. The scope of this SBP certificate covers only pellet production site in Ust-Kut. Production site in Novaya Igirma is covered by separate SBP certificate (SBP-01-

The input material used by the Organisation for biomass production contains only secondary feedstock (wood chips and sawdust for pellet production and sawmill residues and bark for dryer).

All feedstock in the reporting period was supplied with FSC Mix Credit claim. BP does not have FSC Controlled wood verification system in its FSC certification scope, and all feedstock is supplied with FSC claim. Feedstock used in the biomass production originates from Russia, Irkutsk region.

Scope description: Production of wood pellets, for use in energy production in Ust-Kut, Irkutsk region, Russia and transportation to Saint Petersburg harbor (post production end point (train, FCA)). The scope of the certificate does not include Supply Base Evaluation.

Scope of the evaluation is indicated in the table below:

| Scope Item                 | Check all   | l that apply t | Change in<br>Scope<br>(N/A for<br>Assessments)                 |   |
|----------------------------|---|----------------|--|---|
| Approved                   | SBP Standard #2 V1.0                              | SBP Standard   | #4 V1.0 SBP Standard #5 V1.0                                   |   |
| Standards:                 | http://www.sustainabl                             | ebiomasspar    | tnership.org/documents   |   |
| Primary Activity:          | Pellet producer                                   |                |  |   |
| Input Material Categories: | SBP-Compliant Pri Feedstock  X Controlled Feedsto |                | SBP-Compliant Secondary Feedstock  SBP non-Compliant Feedstock |   |
|                            | Controlled Wood)                                  |                |  | _ |
|                            | SBP-Compliant Tertiary biomass                    | Post-con       | sumer Tertiary Feedstock                                       |   |
|                            | \$BP-approved Recycled Claim                      | Post-con       | sumer Tertiary Feedstock                                       |   |
|                            |   |                |  |   |



| Chain of custody system                      | <b>✗</b> FSC     | □₽E   | FC  | □\$FI           |            | □GGL  |  |
|--|------------------|-------|---|-----------------|------------|---|--|
| implemented:                                 | implemented:     |       | Percenta  | Percentage      |            | Credit  |  |
| Points of sales                              | handling of      |       | Harbour (e.g. FOB incoterms) legal owner is not responsible for handling of material at the harbour |                 | sale<br>BP | Other point of<br>e (e.g. gate of the<br>boarder, railway<br>tion etc.) |  |
| Provide name of all points of sales          | -<br> -<br> -    |       | -<br>  -<br>  -   |                 |            | Petersburg<br>rbour)  |  |
| Use of SBP claim:                            | X Yes            |       |   | □No             |            |   |  |
| SBE Verification Program:                    | Low risk sou     | ces o | nly   | Sources w       |            | nspecified/   |  |
|  | New districts ap | prove | d for SBP-Co  | ompliant inputs | i:         |   |  |
| Sub-scopes                                   |                  |       |   |                 |            |   |  |
| Specify SBP Product Groups added or removed: |                  |       |   |                 |            |   |  |
| Comments:                                    |                  |       |   |                 |            |   |  |



#### Specific objective 3

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.



## SBP Standards utilised

#### SBP Standards utilised 4.1

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 1.0. March 2015. http://www.sustainablebiomasspartnership.org/documents

### SBP-endorsed Regional Risk Assessment

Not applicable



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

#### **Description of Biomass Producer** 5.1

BP is a pellet producer located in Ust-Kut, Irkutsk region. BP may produce about 70 000 tons of wood pellets annually. Incoming material is secondary feedstock in form of sawdust and wood chips (feedstock for biomass) and wood residues and bark (feedstock for dryer heating). During the reporting period, all material was coming from neighboring sawmill, the only one supplier which is FSC certified. Final product is transported in big bags by railway to St. Petersburg harbor.

The BP has implemented FSC credit system and produced biomass is sold with FSC Mix Credit claim (SBPcompliant biomass) or FSC Controlled Wood claim (SBP-controlled biomass). During the reporting period all feedstock for pellet production was supplied with FSC Mix Credit claim. There are no non-controlled inputs of the feedstock.

### Description of Biomass Producer's Supply Base

The feedstock supply base is located within the territory of 2 forestry divisions, 3 administrative divisions of Irkutsk region in Siberian federal district of the Russian Federation.

The total area of the wooded lands in the RF territory is 764 million hectares, which constitutes approximately 21% of the world stumpage stocks. The areas occupied with the main forest forming species have remained quite stable over the last decades. The softwood species are 68,4%, hardwood species - 2,4%, soft-wooded broadleaved species - 19,3%. Other wood species are less than 1 % of the forests.

In accordance with the RF legislation, all of the forest area lands are the property of the state. Legal entities are provided with the forested land parcels on a leasehold and short-term exploitation basis. The lease relationship is the dominant legal form of the forests exploitation. The lease period can last from 10 to 49 years.

The forested land parcels leasing contracts or the forest stand purchase-and-sale contracts are concluded at public sales of the right to conclude such contracts. The parcels being leased are subject to the mandatory state cadastral registration. In accordance with Forestry Code of the RF, every forest user who has leased a forested land parcel shall be obliged to:

- Support the forest conservation, protection and reproduction practices,
- Present the forestry declaration annually,
- Develop and implement the forest management project,
- Present a report on the forests exploitation, its conservation, protection and reproduction.

Countrywide, the exploitation of the allowable cut area does not exceed 35%. According to the Russian Federal Forestry Agency data, the total reserve for the cut volumes increase to support the wood harvesting countrywide is about 400 million m<sup>3</sup> per year. However, a percentage of the forests difficult to access is high in the country and the infrastructure is underdeveloped almost everywhere.



Ensuring the proper reproduction of the forest resources and the protective forestation are the mandatory conditions of the forests exploitation. All reforestation works in the forested land parcels leased out are planned and performed by the forest users at their own expense in accordance with the forest resources development projects.

When harvesting the wood, Red Book species as well as their habitat are subject to preservation according to the forestry legislation of the RF. Cutting the valuable, endangered and specially protected wood species is prohibited.

The RF timber complex, including the forestry and the timber harvesting and processing branches, plays a critical part in the economy of the country. There are about 60 thousand large, medium and small companies involved in the timber complex of the RF. About 1 million people are employed in the timber complex.

The forest surveying is the fundamental factor of the forestry keeping in the Russian Federation.

The forest surveying is a specialized type of the forestry activity which provides the performance of the forest condition assessment as well as the planning of steps aimed at the reasonable exploitation, reproduction, conservation and protection of the forests and its higher productivity and stability.

The forest surveying data are the basis for developing the primary documentation on the forestry keeping. The information received from the forest surveying allows for getting the correct and actual data on the forest stock quality, its taxation characteristics, species composition. In total, these data let planning of the forestry activity in the forestry branch.

The forestry certification is an effective tool to oppose illegal wood harvests and illegal wood trade. Forest Stewardship Council (FSC) certification system is widely used in the RF. The area of the certified forests in the RF is about 40 million hectares or 30% from the total amount of the forests being leased. This is the second largest country in the world for the FSC certified forests area after Canada. The number of the forestry management certificates is 121 and the number of chain of custody certificates is 320 (in October of 2015). Also, the number of certificates for the controlled wood is growing continuously. The dynamics of the forestry certification development in the RF demonstrates a reliable approach to providing the legality of the wood harvested and observing the common environmental and social requirements of the stable forestry management.

#### **BP's Supply Base**

The supply base is the overall forest stock area of the forestry divisions listed below. The total area of the supply base, is 7506,8 thousand ha.

#### Irkutsk region

Ust-Kutskoe forest division - 3 248 455 ha

Kirenskoe forest division - 4 258 352 ha

The supply base is located in the Middle Siberian upland taiga forest district – forests of Angara Region.

Irkutsk region territory embraces the south of the Middle Siberian upland and the upstream basins of Angara, Lena and Nizhnaya Tunguska rivers. In the southwest, its borders are wedged by the Eastern Sayan mountain masses, Primorskiy and Baikalskiy mountain ranges in the east, Stanovoye and Patomskoye plateaus. The major part of the territory has a plain relief with a slight slope to the north and the northwest. That is confirmed by the rivers flowing in this direction. Heights of 500-600 m above sea level prevail on the plain ground with the absolute elevations



decreasing to 300-400m to the northwest, although, there are separate elevations of up to 1000m and higher, namely, the Leno-Angarskoe plateau and Angarskiy mountain ridge; the land relief shapes include mountains, plains, hollows and valleys.

As a whole, the climate within the supply base territory is acutely continental. The maximum temperature in the summer can rise up to +30 °C; in winter, the thermometers can show the temperature below -50°C in some of the northern districts. There are old-growth forests and High Conservation Value Forests of different types outlined in the supply base territory.

There are no CITES or IUCN species in supply base which could be used by BP for pellet production.

BP itself does not have any forest management units in concession. In the meanwhile, the main feedstock supplier for the fuel pellets production in Ust-Kut town is SSB LLC «TSFC» «LDK Ust-Kut» sawmill certified against FSC CoC. In its turn, the round wood is delivered to the sawmill from the forest management units leased out to ZAO «LDK Igirma» for the period of 49 years, the total area being 690 063,8 ha, with the annual allowable cut volume of 1390,2 thds.m<sup>3</sup>, LLC «SEF group» for the period of 25 years, the area being 318 057,0 ha, with the annual allowable cut volume of 590,8 thds.m<sup>3</sup>, LLC «TSFC» for the period of 49 years, the area being 1 096 613 ha, with the annual allowable cut volume of 2017,5 thds.m<sup>3</sup>, given that the entire area of the forested parcels is certified by FSC forestry management system and also the round timber is delivered by the third-party suppliers included in the own FSC inspection system for the controlled wood from non-certified suppliers.

In average, the 3<sup>rd</sup> -4<sup>th</sup> class of quality (bonitet) prevails in the forests. The most rational approach is applied to organizing the clear-cutting process when harvesting the wood in the forested parcels of ZAO «LDK Igirma», LLC «SEF group», LLC «TSFC», i.e. small-scale cuts are applied in 90% of the cases (small – scale cut areas are areas exploited by companies and do not exceed 30 ha), followed by the reforestation activities conducted by all means available.

Based on the analysis results, ZAO «LDK Igirma», LLC «SEF group», LLC «TSFC» has drawn up a plan of shifting from the large-scale clear cuts with the area of more than 30 ha to the small-scale cuts for the period of 2014-2019, for the purpose of meeting the requirements of the Russian national FSC standard. Also, the companies are actively performing selective cuts, cleaning cuts in all of the forested parcels in accordance with the forest management plans.

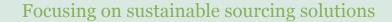
During the reporting period all feedstock for pellet production was supplied by SSB LLC «TSFC» «LDK Ust-Kut» sawmill with FSC Mix Credit claim.

The main forest forming tree species are Pine (Pinus sylvestris), Siberian Larch (Larix sibirica), Siberian Cedar (Pinus sibirica), Siberian Spruce (Picea obovata), Siberian Fir (Abies sibirica). In average, the wood species ratio is 62% of the common Pine (Pinus silvestris), 32% of the Siberian Larch (Larix sibirica), not more than 6% of the Siberian Spruce (Picea obovata) and the Siberian Fir (Abies sibirica).

It is worth noting that BP has partnership relations with SSB LLC «TSFC» «LDK Ust-Kut», which, in its turn, supports the district and the local population socio-economically.

Detailed information about the supply base region (general description of the forest resources and forest management practices within the Supply Base) is publically available at the BP's homepage:

http://www.sibpellets.ru/uploads/report\_ust\_kyt.pdf?v3





http://www.sibpellets.ru/uploads/report\_ust\_kyt\_en.pdf?v3

#### Detailed description of Supply Base 5.3

7 506 807 ha Total Supply Base area (ha):

Tenure by type (ha): 100% state owned, 100% private management

Forest by type (ha): Boreal 7 506 807 ha

Forest by management type (ha): 100% Natural

Certified forest by scheme (ha): 2 104 733 ha (specifically, FSC)

### Chain of Custody system

The BP is holding valid FSC Chain of Custody and FSC Controlled wood certificate http://info.fsc.org/details.php?id=a023300000XryMXAAZ&type=certificate&return=certificate.php

BP is implementing FSC credit system. FSC Credit system is used for materials received with FSC Mix Credit and FSC Controlled Wood claims. Controlled material verification system according to Annex 3 of FSC-STD-40-005 is not applicable. Secondary feedstock is transported to BP by conveyor belt for pellet production and by front-end loader for dryer. Pellets are sold using existing FSC credit account. No primary feedstock or other (non-certified feedstock) used in pellet production.

In case of the FSC sales the volume of sold pellets is withdrawn from the credit account. In the reporting period BP did not sell biomass with SBP claim. All feedstock in the reporting period was supplied with FSC Mix Credit claim.



## **Evaluation process**

#### Timing of evaluation activities 6.1

Onsite annual audit was conducted on December 1, 2016 (8 h). Audit activities included documents review at office, inspection of production facilities and staff interviews.

| Activity  | Location        | Date/time   |
|---|-----------------|-------------|
| Opening meeting*  | Office          | 01/12/2016  |
|   |                 | 09.00-09.30 |
| Documents and procedures review.  Inputs review. Staff interviews | Office          | 01/12/2016  |
|   |                 | 09:30-12.15 |
| Production site tour  | Production site | 01/12/2016  |
|   |                 | 12.15-13.00 |
| GHG calculation review  | Office          | 01/12/2016  |
|   |                 | 13:00-18:00 |
| Closing meeting*  | Office          | 01/12/2016  |
|   |                 | 18:00–18:30 |
| End of the evaluation   |                 | 01/12/2016  |
|   |                 | 18:30       |

Onsite corrective action verification audit was conducted on April 7, 2017 (4 h). Audit activities included documents review at office, inspection of production facilities and staff interviews.

| Activity         | Location | Date/time   |
|------------------|----------|-------------|
| Opening meeting* | Office   | 07/04/2017  |
|                  |          | 09.00-09.15 |



| Documents and procedures review.  Inputs review. Staff interviews.  Production site tour | Office and production site | 07/04/2017<br>09:15-11.45 |
|--|----------------------------|---------------------------|
| Production site tour   |                            | 00.10 11.10               |
| Closing meeting*   | Office                     | 07/04/2017                |
|  |                            | 11:45–12:00               |
| End of the evaluation  |                            | 07/04/2017                |
|  |                            | 12:00                     |

#### Description of evaluation activities 6.2

#### Composition of audit team:

| Auditor(s), roles  | Qualifications   |
|--------------------|--|
| Nikolai Tochilov   | NEPCon SBP lead auditor. He passed SBP auditor training in Tallinn in  |
|                    | January 2015; previous experience with more than 15 SBP assessments    |
|                    | in Russia. Role at the audit: lead auditor                             |
| Natalia Zaladinova | NEPCon FSC CoC lead auditor. She passed SBP lead auditor training      |
|                    | course in December 2016 and participated in a number of SBP            |
|                    | assessments in Russia in training purposes.                            |
|                    | Role at the audit: auditor in training.                                |
| Roman Kurakin      | NEPCon FSC CoC lead auditor. He successfully passes SBP lead auditor   |
|                    | training course in December 2016 and participated in 2 SBP assessments |
|                    | in Russia.   |
|                    | Role at the audit: auditor in training                                 |

The annual 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 GHG data availability.

Description of the annual audit evaluation:

All SBP related documentation connected to the SBP as well as FSC CoC system of the organisation, including SBP Procedure, GHG data calculations/ data sheet, Supply Base Report and FSC system description was provided by the company at the beginning of audit. Audit started with an opening meeting attended by the SBP responsible person.

Auditor introduced audit team, provided information about audit plan, methodology, auditor qualification, confidentiality issues, and evaluation methodology and clarified certification scope. During the opening meeting the auditor explained CB's approval related issues.



After that auditor went through all applicable requirements of the SBP standards nr.2, 4, 5 and instruction document 5a 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. During the process overall responsible person for SBP system and other staff were interviewed.

After a roundtrip around BP's pellet production was undertaken.

At the end of the audit findings were summarised and audit conclusion based on use of 3 angle evaluation method were provided to the management and SBP responsible person.

The corrective action verification audit visit was focused on evaluation of open major non-conformity reports raised after the previous annual audit.

Auditor introduced audit team, provided information about audit plan, methodology, auditor qualification, confidentiality issues, and evaluation methodology and clarified certification scope. During the opening meeting, the auditor explained CB's approval related issues.

After that auditor evaluated all open major NCRs based on documents review and staff interview and undertook a roundtrip around BP's pellet production.

At the end of the audit findings were summarised and audit conclusion based on use of 3 angle evaluation method were provided to the management and SBP responsible person.

### Process for consultation with stakeholders

No stakeholder consultations conducted prior and during annual audit and corrective action verification audit.



## Results

#### Main strengths and weaknesses 7.1

Strength: Use of the FSC credit system. All secondary feedstock in the reporting period was FSC certified (FSC Mix Credit).

Weaknesses: See NCRs raised during this audit.

### Rigour of Supply Base Evaluation

Not applicable.

### Compilation of data on Greenhouse Gas emissions

See NCRs 02/16, 05/17, 06/17.

#### Competency of involved personnel 7.4

During the audit it was identified that staff members involved into the SBP system management and implementation are in most cases aware of certification requirements. Audit team, however, did not get evidence that company's BP's management and monitoring system functions in a proper way. See NCR 02/17.

#### Stakeholder feedback 7.5

No stakeholder comments are received.

### 7.6 Preconditions

None.



### Review of Biomass Producer's Risk 8 Assessments

Not applicable.



## Review of Biomass Producer's mitigation measures

Not applicable.



## 10 Non-conformities and observations

NCRs issued during the assessment 2016

| NCR: 01/16  | NC Classification: minor   |  |  |  |  |
|---|--|--|--|--|--|
| Standard & Requirement:   | SBP Standard # 2, requirement 7.3, requirement 2C 4.1  |  |  |  |  |
| <b>Description of Non-conformanc</b>  | e and Related Evidence:  |  |  |  |  |
| BP used the previous version of Supply Base Report template when preparing to SBP assessment. During assessment report preparation, new version of Supply Base Report (version 1.1) have been |  |  |  |  |  |
| Организация использовала пред   | developed by SBP. Организация использовала предыдущую форму отчета о ресурсной базе при подготовке к оценке SBP. Во время подготовки отчета об оценке SBP была разработана новая версия (1.1)  |  |  |  |  |
| Corrective action request:  | Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance. |  |  |  |  |
| Timeline for Conformance:   | By the next surveillance audit   |  |  |  |  |
| Evidence Provided by Organisation:  |  |  |  |  |  |
| Findings for Evaluation of Evidence:  | BP submitted updated version of SBR which has been prepared using the latest version of the SBR template.  |  |  |  |  |
| NCR Status:   | NCR Status: CLOSED   |  |  |  |  |
| Is the non-conformity likely to impact upon the integrity of the affected SBP- certified products and the credibility of the SBP trademarks?  Yes  No   |  |  |  |  |  |

| NCR: 02/16   | R: 02/16 NC Classification: MAJOR / ЗНАЧИТЕЛЬНОЕ                   |  |  |  |
|--|--|--|--|--|
| Standard & Requirement: SBP Instruction # 5A, requirement 5.1.1  |  |  |  |  |
| <b>Description of Non-conformance</b>  | e and Related Evidence:  |  |  |  |
| Pellets shall be transported from p  | roduction site to Lena Vostochanya railway station by diesel       |  |  |  |
| locomotive. Since pellet production  | n has not been started yet, exact diesel consumption is not known. |  |  |  |
| Therefore BP refers to the results   | of "Joint Research Commission European Commission"                 |  |  |  |
| http://iet.jrc.ec.europa.eu/bf-ca/site   | es/bf-ca/files/files/documents/eur26696_online_final_v3.pdf where  |  |  |  |
| the fuel efficiency coefficient was t  | aken from (6 km distance x 0,252 fuel coefficient = 1,512 MJ/tone  |  |  |  |
| biomass). However the above mer  | ntioned link to webpage does not work therefore auditor could not  |  |  |  |
| justify the figure.  |  |  |  |  |
| Пеллеты предолагается транспо  | ртировать с участка производства до станции Лена                   |  |  |  |
| Восточная по железной дороге с использованием дизельного локомотива. Однако, поскольку                               |  |  |  |  |
| пеллетное производство еще не  | запущено, актуальны данные о расходе дизельного топлива            |  |  |  |
| локомотивом отсутствуют. Поэто   | ому организация, ссылаясь на результаты исследования "Joint        |  |  |  |
| Research Commission European   | Commission" http://iet.jrc.ec.europa.eu/bf-ca/sites/bf-            |  |  |  |
| ca/files/files/documents/eur26696 online final v3.pdf берет оттуда коэффициент и делает                              |  |  |  |  |
| расчет расхода энергии (6 км х 0,252 = 1,512 МДж/тн. биомассы). Однако указанная выше                                |  |  |  |  |
| ссылка на веб-сайт не работает, и аудитор не смог оценить адекватность использованной                                |  |  |  |  |
| методики расчета.  |  |  |  |  |
| Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. |  |  |  |  |



|   | Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the |  |  |
|---|--|--|--|
|   | root cause to eliminate and prevent recurrence of the non-   |  |  |
|   | conformance.   |  |  |
| Timeline for Conformance:                                     | 3 months (By 17.04.2017) / 3 месяца (до 17.04.2017)  |  |  |
| Evidence Provided by<br>Organisation:                         | Annual audit: No evidence / Ежегодный аудит: Свидетельств<br>не предоставлено  |  |  |
|   | Corrective action verification audit: Instruction Document 5B Energy and GHG Data, section 6.1.8                           |  |  |
|   | Аудит устранения значительных несоответствий: Instruction<br>Document 5B Energy and GHG Data, section 6.1.8                |  |  |
| Findings for Evaluation of                                    | Annual audit: Finding stays the same. NCR status is upgraded   |  |  |
| Evidence:   | from minor to major / Ежегодный аудит: Вывод остается  |  |  |
|   | прежним. Статус несоответствия повышен с   |  |  |
|   | незначительного до значительного   |  |  |
|   | Corrective action verification audit: BP referred to Instruction   |  |  |
|   | Document 5B Energy and GHG Data, section 6.1.8 (reference  |  |  |
|   | transport efficiencies from BioGrace (0,25 MJ/t.km).   |  |  |
|   | ·  |  |  |
|   | Аудит устранения значительных несоответствий:  |  |  |
|   | Организация сослалась на Instruction Document 5B Energy  |  |  |
|   | and GHG Data, section 6.1.8, где энергозатраты для   |  |  |
|   | дизельного тепловоза указаны со ссылкой на BioGrace (0,25 МДж/т.км).   |  |  |
| NCR Status:   | CLOSED/3AKPЫTO   |  |  |
|   | act upon the integrity of the affected SBP-  |  |  |
| certified products and the credibility of the SBP trademarks? |  |  |  |

| NCR: 03/16   | NC Classification: minor  |  |
|--|---|--|
| Standard & Requirement:  | SBP Instruction 5A, requirement 7.1   |  |
| Description of Non-conformance   | e and Related Evidence:   |  |
| BP determined one product group  | - Other Feedstock (Group 7, includes all feedstock not included   |  |
| in 1-6 above.). However according  | to SBP classification, the feedstock with FSC claims (100% or   |  |
| Mix Credit) falls to Group 6 – SBP-  | -compliant secondary feedstock (excluding anything in Product   |  |
| Groups 4 and 5). And the feedstoo  | k with FSC Controlled Wood claim falls to Group 4 – Secondary   |  |
| Feedstock supplier under a claim i   | under an SBP approved controlled feedstock claim (specifically  |  |
| FSC).  |   |  |
| Организация определила одну группу продукции - Other Feedstock (Группа 7). Однако,       |   |  |
| согласно классификации SBP, материал с заявлениями FSC (100% или Mix Credit) относится к |   |  |
| Группе 6 – SBP-compliant secondary feedstock. Материал с заявлением FSC Controlled Wood  |   |  |
| относится к Группе 4 – Secondary Feedstock supplier under a claim under an SBP approved  |   |  |
| controlled feedstock claim (specifically FSC).   |   |  |
| Corrective action request:   | Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance. |  |
| Timeline for Conformance:  | By the next surveillance audit  |  |





| Evidence Provided by   | Profiling Information Batch Specific Data Energy Use Data       |  |
|--|---|--|
| Organisation:  |   |  |
| Findings for Evaluation of   | BP determined two product group - Group 4. Secondary            |  |
| Evidence:  | Feedstock supplier under a claim under an SBP approved          |  |
|  | controlled feedstock claim (specifically FSC) and Group 6. SBP- |  |
|  | compliant secondary feedstock (excluding anything in Product    |  |
|  | Groups 4 and 5).  |  |
| NCR Status:  | CLOSED  |  |
| Is the non-conformity likely to impact upon the integrity of the affected SBP- |   |  |
| certified products and the credibility of the SBP trademarks?                  |   |  |

| NCR: 04/16  | NC Classification: minor   |  |  |  |
|---|--|--|--|--|
| Standard & Requirement:   | SBP Standard #5, requirement 5.1   |  |  |  |
| Description of Non-conformanc   | Description of Non-conformance and Related Evidence:   |  |  |  |
| BP has not yet launched the pellet  | BP has not yet launched the pellet plant and therefore implemented theoretical approach for  |  |  |  |
| collection of all required data, inclu  | liding Energy Use data, Biomass Profiling Information and Batch  |  |  |  |
| Specific Data. Theoretical approach   | ch is acceptable at the moment, but data need more justified   |  |  |  |
| evidence and shall be based on a  | ctual results whenever possible.   |  |  |  |
| Пеллетное производство еще не   | е запущено, поэтому организация использовала   |  |  |  |
| теоретические расчеты для сбо   | ра всей требуемой информации, включая Energy Use data,   |  |  |  |
| Biomass Profiling Information and   | Batch Specific Data. Теоретический подход на данный момент   |  |  |  |
| допустим, но данные должны им   | еть более весомое подтверждение и во всех возможных  |  |  |  |
| случаях должны быть основаны  | на реальных результатах работы.  |  |  |  |
| Corrective action request:  | Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance. |  |  |  |
| Timeline for Conformance:   | By the next surveillance audit   |  |  |  |
| Evidence Provided by Organisation:  | Logs, invoices   |  |  |  |
| Findings for Evaluation of Evidence:  | BP used the actual data on energy consumption at different stages of pellet production and transportation, where it was applicable.  |  |  |  |
| NCR Status:   | CLOSED   |  |  |  |
| Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks?  Yes No |  |  |  |  |

| NCR: 05/16   | NC Classification: MAJOR / ЗНАЧИТЕЛЬНОЕ |  |
|--|---|--|
| Standard & Requirement:  | SBP Standard #2, requirement 2C, 4.1    |  |
| Description of Non-conformance and Related Evidence:   |   |  |
| Assess 2016. The BP's name in Supply Base Report is LLC "Siberian fuel pellets", whereas in FSC public database as well as in SBP trademark license agreement it is named as Siberian Wood Pellets Ltd.  |   |  |
| В отчете о ресурсной базе (английская версия) организация названа как LLC "Siberian fuel pellets", в то время как в публичной базе данных сертификатов FSC, а также в лицензионном соглашении с SBP организация названа как Siberian Wood Pellets Ltd. |   |  |



| Corrective action resusati | Organization shall implement somestive actions to demonstrate   |  |  |
|----------------------------|---|--|--|
| Corrective action request: | Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance. |  |  |
| Timeline for Conformance:  | 3 months (By 17.04.2017) / 3 месяца (до 17.04.2017)   |  |  |
| Evidence Provided by       | Annual audit: Supply Base Report dated 15.11.2016   |  |  |
| Organisation:              | Corrective action verification audit: Supply Base Report dated of 06/04/2017  |  |  |
| Findings for Evaluation of | Annual audit: SBR has been prepared using the latest available  |  |  |
| Evidence:                  | version of the template. The following mistakes identified in SBR:  |  |  |
|                            | - Section 1: audit close date is incorrect, and location of   |  |  |
|                            | closing meeting is not specified; the reference is given to   |  |  |
|                            | BP's homepage where SBE is posted – however SBE is  |  |  |
|                            | not applicable and this is mentioned in SBR   |  |  |
|                            | - The total volume of feedstock specified in Section 2.5 (f,  |  |  |
|                            | I) as 450 000 m3, however in fact the feedstock supplies  |  |  |
|                            | were much fewer in the reporting period (Section 13.4)  |  |  |
|                            | , , , , , , , , , , , , , , , , , ,   |  |  |
|                            | - Company name is still different from what is specified in   |  |  |
|                            | trademark license agreement (Siberian Wood Pellet Ltd)  |  |  |
|                            | and FSC DB.   |  |  |
|                            | - It is specified in supply base report that BP uses wood   |  |  |
|                            | industry wastes with FSC Mix Credit and FSC Controlled  |  |  |
|                            | Wood claims for pellet production, however in fact in   |  |  |
|                            | reporting period BP used only the feedstock with FSC  |  |  |
|                            | Mix Credit claim. Section 2.4 of Supply Base Report   |  |  |
|                            | specifies that the tree species in the feedstock have the   |  |  |
|                            | following proportion – pine – 62%, larch – 32%, other   |  |  |
|                            | species – 6%. However SBP procedure and Profiling   |  |  |
|                            | information and Batch specific data sheet include other   |  |  |
|                            | figures. SBP procedure: pine – 82%, larch – 12%, other  |  |  |
|                            | species – 6%; Profiling information and batch specific  |  |  |
|                            | data sheet: pine – 65%, larch – 30%, other species –  |  |  |
|                            | 5%.   |  |  |
|                            | - the following information required in new SBR template  |  |  |
|                            | section 2.1. is missing: an overview of the proportions of SBP feedstock product groups (Controlled Feedstock, SBP-compliant Primary Feedstock, SBP-compliant   |  |  |
|                            | Secondary Feedstock, SBP-compliant Tertiary Feedstock, SBP non-compliant Feedstock) showing the proportions of each which are certified and uncertified.  |  |  |
|                            | <ul> <li>NCR status is upgraded from minor to major.</li> </ul>   |  |  |
|                            | Ежегодный аудит: Отчет о ресурсной базе подготовлен в   |  |  |
|                            | последней версии формы отчета. В нем отмечены   |  |  |
|                            | следующие ошибки:   |  |  |
|                            |   |  |  |



|   | - Раздел 1: дата закрывающего совеща  | ния во время   |
|---|---|--|
|   | аудита указана неверно, место провед  | цения  |
|   | совещания не указано; дается ссылка   | на домашнюю  |
|   | страницу компании, где размещена St   | ıpply Base   |
|   | Evaluation (оценка ресурсной базы), од  | днако это не   |
|   | применимо для данной сертификации   | о чем и  |
|   | указано далее в отчете  |  |
|   | <ul> <li>Общий объем входящего сырья в разд</li> </ul>  | целе 2.5 (f, I)  |
|   | указан в размере 450 000 м3, в то вре   | мя как   |
|   | фактически в отчетном периоде получ   | ено  |
|   | существенно меньше сырья (раздел 1  | 3.4)   |
|   | - Наименование компании до сих пор о <sup>-</sup>   | гличается от   |
|   | того, как оно написано в лицензионног   | и соглашении с   |
|   | SBP и в базе данных FSC   |  |
|   | <ul> <li>В отчете о ресурсной базе указано, чт<br/>производства пеллет используются ос<br/>лесопиления с заявлением FSC Mix C<br/>Controlled Wood, однако проверка доку</li> </ul>  | статки<br>redit и FSC<br>ументации   |
|   | показала, что в ревизионный период и входящее сырье только с заявлением В разделе 2.4 отчета о ресурсной база соотношение пород во входящем сырт 62%, лиственница – 32%, остальные г в процедуре SPB и в документе profilir bath specific data указаны другие показ процедуре – сосна - 82%, лиственница остальные породы – 6%, а в profiling ir  | FSC Mix Credit.  е указано ье: сосна – породы – 6%, но ng information ватели. В SBP а - 12%, nformation bath |
|   | specific data - сосна - 65 %, лиственница - 30%, остальные породы — 5%.  - В новой форме отчета о ресурсной базе в разделе 2.1 отсутствует следующая информация: обзор соотношений групп SBP входящего сырья (Controlled Feedstock, SBP-compliant Primary Feedstock, SBP-compliant Secondary Feedstock, SBP-compliant Tertiary Feedstock, SBP non-compliant Feedstock) включая пропорции сертифицированного и не сертифицированного сырья.  - Статус несоответствия повышен до значительного. |  |
|   |   |  |
|   |   |  |
|   | Corrective action verification audit: Organisation submitted new version of Supply Base Report. The report contains correct information and does not have any mistakes.   |  |
|   | Аудит устранения значительных несоответствий: Организация предоставила обновленный Отчет о ресурсной базе. Отчет включает в себя корректную информацию; какиелибо ошибки в нем отсутствуют.   |  |
| NCR Status:   | CLOSED / 3AKPHTO  | v  |
| Is the non-conformity likely to impact upon the integrity of the affected SBP- certified products and the credibility of the SBP trademarks?  Yes  No |   |  |

| NCR: 06/16  | NC Classification: minor   |  |  |
|---|--|--|--|
| Standard & Requirement:   | SBP Standard #4 requirement 6.2.1  |  |  |
| Description of Non-conformance and Related Evidence:  |  |  |  |
| Assess 2016. It is not specified in SBP procedure that energy and carbon data are collected using   |  |  |  |
| the latest version of SBP Standard  | the latest version of SBP Standard 5   |  |  |
| В процедуре SBP не указано, что информация о затратах энергии должна собираться с   |  |  |  |
| использованием самой последней версии стандарта SBP № 5.  |  |  |  |
| Corrective action request:  | Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance. |  |  |
| Timeline for Conformance:   | By the next surveillance audit   |  |  |
| Evidence Provided by Organisation:  | SBP Procedure  |  |  |
| Findings for Evaluation of Evidence:  | Section 2.1 of SBP procedure states that energy and carbon data shall always be collected using the latest version of SBP Standard 5   |  |  |
| NCR Status:   | CLOSED   |  |  |
| Is the non-conformity likely to impact upon the integrity of the affected SBP- certified products and the credibility of the SBP trademarks?  Yes  No |  |  |  |

| NCR: 07/16  | NC Classification: minor   |  |  |
|---|--|--|--|
| Standard & Requirement:   | SBP Instruction #5A, requirement 3.7.6   |  |  |
| <b>Description of Non-conformanc</b>  | e and Related Evidence:  |  |  |
| Assess 2016. BP has calculated to   | Assess 2016. BP has calculated total diesel consumption for haulage of sawmill residues (feedstock   |  |  |
| for biomass) and bark (fuel for dryer), without separate identification.  |  |  |  |
| Организация сделала общий расчет расхода дизельного топлива для доставки отходов  |  |  |  |
| лесопильного производства (сырье для производства пеллет) и коры (топливо для   |  |  |  |
| теплогенератора), без разделен  | теплогенератора), без разделения.  |  |  |
| Corrective action request:  | Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance. |  |  |
| Timeline for Conformance:   | By the next surveillance audit   |  |  |
| Evidence Provided by Organisation:  | -  |  |  |
| Findings for Evaluation of Evidence:  | Since the wording of indicator specifies <i>should</i> but not <i>shall</i> , auditors raise Observation 02/17 and close this NCR.   |  |  |
| NCR Status:   | CLOSED   |  |  |
| Is the non-conformity likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks? |  |  |  |



#### **New NCRs**

| NCR: 01/17   | NC Classification: minor   |       |  |
|--|--|-------|--|
| Standard & Requirement:  | SBP Standard # 2, requirement 2C, 5.2  |       |  |
| Description of Non-conformance and Related Evidence:   |  |       |  |
| It is specified in section 13 that updates are not applicable for Supply Base Report. However, reasons for that are not specified. |  |       |  |
| В отчете о ресурсной базе в разделе Обновления указано, что данный пункт не применим, однако, причины этого не указаны.            |  |       |  |
| Corrective action request:   | Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance. |       |  |
| Timeline for Conformance:  | By the next audit, but not later than 12 months after report finalization date (01/03/2018) / До следующего ежегодного аудита, но не позднее 12 месяцев с даты утверждения отчета (01.03.2018)   |       |  |
| Evidence Provided by Organisation:   | PENDING  |       |  |
| Findings for Evaluation of Evidence:   | PENDING  |       |  |
| NCR Status:  | ОРЕМ / ОТКРЫТО   |       |  |
| Is the non-conformity likely to impa   | act upon the integrity of the affected SBP-  | Yes 🗌 |  |
| certified products and the credibility of the SBP trademarks?  |  |       |  |

| NCR: 02/17   | NC Classification: MAJOR                                   |  |
|--|--|--|
| Standard & Requirement:                              | SBP Standard # 2, requirement 15.1, 15.2, 15.4, 15.6, 15.7 |  |
| Description of Non-conformance and Related Evidence: |  |  |

According to BP's SBP procedure, in case any improvements or changes needed in management system, SBP responsible makes changes within two weeks. After that information about changes/revisions (including all applicable documents) is submitted to BP higher management for review and approval within five days. As soon as the changes are approved, all involved staff shall be informed within two days. Furthermore, within two weeks the staff shall pass relevant training. In the reporting period, new Director General was appointed in company. Review of the log where all training records are registered, identified that company's new higher management did not review the SBP procedures. Auditors were provided with SBP procedure dated of 15/11/2016, however there were no records in the log which could confirm that staff was informed about changes in procedure. Furthermore, SBP procedure specifies that when SBP certification responsible person is not available, relevant responsibility is delegated to pellet production chief. However, at the moment of annual audit SBP responsible and pellet production chief is the same person. Auditors came to conclusion that BP's management and monitoring system does not function properly. Since there is a number of non-conformities related to different indicators under point 15 of the standard, auditors consider that cumulative effect appears which results to major non-conformity.

Согласно процедурам организации, при изменении в системе управления ответственный за сертификацию SBP вносит в течение двух недель все необходимые изменения. После внесения всех изменений ответственный по сертификации SBP в течение 5 дней доводит до руководства информацию о произошедших изменениях с приложением всех необходимых



документов. После одобрения руководством внесених изменений и плана обучения/доведения о произошедших изменениях до ответственных лиц, ответственный по сертификации SBP в течение 2-х дней информирует ответственных лиц, задействованных на производстве. В течение 2 недель персонал проходит соответствующее обучение. В ревизионном периоде у организации сменился генеральный директор. Проверка журнала «Журнал обучения SBP» показала, что руководитель организации не был ознакомлен с SBP процедурами. Аудиторам была предоставлена Процедура SBP, датированная 15.11.2016, однако в журнале обучения отсутствовали записи, подтверждающие, что персонал был ознакомлен с изменениями в процедурах. Также в процедуре организации указано, что случае отсутствия ответственного по сертификации SBP, его функции выполняет начальник производства, однако на момент проведения аудита, начальник производства и ответственный по сертификации - это одно и то же лицо. В связи с этим, аудиторы посчитали, что система управления для поддержания соответствия требованиям в организации не функционирует должным образом. Поскольку в рамках пункта 15 стандарта выявлено сразу несколько несоответствий по разным индикаторам, аудиторы считают, что в данном случае имеет место кумулятивный эффект, что привело к значительному несоответствию.

|                                      | рскі, что приволо к значитольному несоответствию.  |  |
|--------------------------------------|--|--|
| Corrective action request:           | Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-  |  |
|                                      | conformance.   |  |
| Timeline for Conformance:            | 3 months (by 01.06.2017) / 3 месяца (до 01.06.2017)  |  |
| Evidence Provided by Organisation:   | Training log (Siberian Wood Pellets, Ust-Kut production site), started on 07/12/2015 / Журнал обучения SBP ООО «Сибирские Топливные Гранулы» площадка г. Усть-Кут,   |  |
|                                      | начат 07.12.2015<br>Training log (Trans-Siberian Forest Company), started on<br>03/04/2017 / Журнал обучения SBP ООО «ТСЛК», начат<br>03.04.2017   |  |
| Findings for Evaluation of Evidence: | Staff training was conducted: -prior to main evaluation -on 10/05/2016 after launching the pellet production -on 25.11.2016 after changes in SBP procedures -on 03/04/2017 prior to CVA audit and due to change of SBP certificate holder. Updated SBP procedure as well as Supply Base Report were submitted to BP top manager, who approved it. After that, additional training was provided to the relevant staff.  |  |
|                                      | Обучение персонала проводилось: - перед основной оценкой - 10.05.2016 при запуске производства - 10.07.2016 при смене ответственного за сертификацию - 25.11.2016 после изменений в процедурах SBP - 03.04.2017 перед аудитом устранения значительных несоответствий, а также в связи со сменой держателя сертификата с ООО «СТГ» на ООО «ТСЛК».  Измененная процедура SBP, а также отчеты о ресурсной базе были предоставлены для ознакомления руководителю Организации, который затем завизировал из своей |  |





|  | подписью, после чего сотрудники, вовлеченные в      |      |
|--|---|------|
|  | сертификацию SBP, прошли дополнительный инструктаж. |      |
| NCR Status:  | CLOSED / 3AKPЫTO                                    |      |
| Is the non-conformity likely to impact upon the integrity of the affected SBP- |   |      |
| certified products and the credibility of the SBP trademarks?                  |   | No 🗌 |

| NCR: 03/17   | NC Classification: MAJOR  |                 |
|--|---|-----------------|
| Standard & Requirement:  | SBP Standard # 5, requirement 5a, 2.1.1                         |                 |
| <b>Description of Non-conformanc</b>   | Description of Non-conformance and Related Evidence:            |                 |
| Post-production end-point is S.Petersburg harbour where pellets are passed to customer (SBP procedure, section 2.4). Delivery conditions – railway, FCA, Incoterms 2010. SBP procedure (Annex 1, section 4) includes requirement on using SBP GHG and profiling data scope reference number. BP submitted the document Profiling, Batch and Energy data, which specifies ZZ as 01 which is not correct, as a new code is not designated for the new reporting period.      |   |                 |
| Конечная точка продажи – Морской порт Санкт-Петербург, где продукция передается покупателю (Процедура SBP, раздел 2.4). Условия поставки Incoterms – FCA, вагон. Процедура SBP (Приложение 1, раздел 4) включает в себя требование использовать кодом точки в формате SBP-XX-YY-ZZ. Предоставлен документ Profiling, Batch and Energy data, в котором ZZ указан как 01, что не является правильным, поскольку для нового отчетного периода должен быть присвоен новый код. |   |                 |
| orrective action request: Organisation shall implement corrective actions to demonstrate   |   | to demonstrate  |
|  | conformance with the requirement(s) referenced                  | above.          |
|  | Note: Effective corrective actions focus on addressing the      |                 |
|  | specific occurrence described in evidence above, as well as the |                 |
|  | root cause to eliminate and prevent recurrence of the non-      |                 |
|  | conformance.  |                 |
| Timeline for Conformance:  | 3 months (by 01.06.2017) / 3 месяца (до 01.06.2                 | 2017)           |
| Evidence Provided by   | Profiling, Batch and Energy data                                |                 |
| Organisation:  |   |                 |
| Findings for Evaluation of   | BP submitted the updated version of Profiling, Ba               | atch and Energy |
| Evidence:  | data sheet, it contains the correct code - SBP-01               | 1-27-02 /       |
|  | Предоставлен обновленный документ Profiling                     | g, Batch and    |
|  | Energy data, в котором указан корректный код – SBP-01-27-02     |                 |
| NCR Status:  | CLOSED/ЗАКРЫТО  |                 |
| Is the non-conformity likely to impa   | act upon the integrity of the affected SBP-                     | Yes 🛚           |
| certified products and the credibility of the SBP trademarks?  |   | No 🗌            |
| (5)  |   | No 🗌            |

| NCR: 04/17   | NC Classification: minor                |
|--|---|
| Standard & Requirement:  | SBP Standard # 5, requirement 5a, 2.2.1 |
| Description of Non-conformance and Related Evidence:   |   |
| The reporting period is defined as May-October 2016 (six months). This is the period between launching the pellet production and annual audit. Minor NCR is issued as soon as exact dates are not specified by BP. |   |
| Отчетный период установлен как май-октябрь 2016 (6 месяцев). Это период с момента запуска производства до проведения ежегодного аудита. Конкретные даты в отчетном периоде не указаны.                             |   |





| Corrective action request:   | Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance. |
|--|--|
| Timeline for Conformance:  | By the next audit, but not later than 12 months after report finalization date (01/03/2018) / До следующего ежегодного аудита, но не позднее 12 месяцев с даты утверждения отчета (01.03.2018)   |
| Evidence Provided by Organisation:   | Profiling, Batch and Energy data   |
| Findings for Evaluation of   | Предоставлен обновленный документ Profiling, Batch and   |
| Evidence:  | Energy data, в котором указан точный отчетный период –<br>22.05.2016 – 31.10.2016  |
| NCR Status:  | CLOSED / 3AKPЫTO   |
| Is the non-conformity likely to impact upon the integrity of the affected SBP- |  |
| certified products and the credibility of the SBP trademarks?                  |  |

| NCR: 05/17  | NC Classification: minor  |  |
|---|---|--|
| Standard & Requirement:   | SBP Standard # 5, requirement 5a, 3.7.1                         |  |
| Description of Non-conformance and Related Evidence:  |   |  |
| Diesel is used by front-end loader VOLVO L180 for transportation and loading of the sawmill residues and bark to dryer. Loader works based on contractor agreement. At the end of the working shift, loader driver submits the internal way-bill to pellet production chief. They waybill includes information on actual working hours of the loader during the shift. At the end of each month chief of pellet production submits this information to economist. Economist creates the report on diesel consumption. During the reporting period, according to data submitted by BP, 15430,1 liters of diesel was consumed and 3136 tones of feedstock was transported, which gives the final result 4,92 I diesel/tone feedstock. However, the document Profiling, Batch and Energy data contains different figure – 5,86 I diesel/tone feedstock.  |   |  |
| Дизельное топливо используется фронтальным погрузчиком VOLVO L180 для транспортировки отходов лесопиления и коры и их использования в топке. Погрузчик работает на основании договоров оказания услуг. Ежедневно, по окончании рабочей смены, водитель погрузчика сдает путевые листы начальнику производства. В путевых листах фиксируется количество отработанных машино-часов в смену. В дальнейшем, по окончании месяца, начальник производства по данным путевых листов предоставляет информацию экономисту. Экономист на основании данных консолидирует отчет движения дизельного топлива и предоставляет данные ответственному по сертификации SBP. В ревизионный период по представленным данным было использовано 15 430.1 литров дизельного топлива, перевезено сырья для топки 3 136 тонн, итого - 4.92 литров дизельного топлива на тонну сырья. Однако в документе profiling information batch specific data указано 5.86 л дизельного |   |  |
| Corrective action request:  | Organisation shall implement corrective actions to demonstrate  |  |
|   | conformance with the requirement(s) referenced above.           |  |
|   | Note: Effective corrective actions focus on addressing the      |  |
|   | specific occurrence described in evidence above, as well as the |  |
|   | root cause to eliminate and prevent recurrence of the non-      |  |
|   | conformance.  |  |



| Timeline for Conformance:  | By the next audit, but not later than 12 months aft finalization date (01/03/2018) / До следующего е аудита, но не позднее 12 месяцев с даты утвер отчета (01.03.2018) | жегодного |
|--|--|-----------|
| Evidence Provided by   | Profiling, Batch and Energy Data file  |           |
| Organisation:  |  |           |
| Findings for Evaluation of   | Организация внесла коррективы в документ Profiling, Batch  |           |
| Evidence:  | and Energy Data. Указан корректный расход дизельного   |           |
|  | топлива погрузчиком – 0,208 л дизельного топлива на тонну  |           |
|  | пеллет   |           |
|  |  |           |
| NCR Status:  | OPEN / OTKPЫTO   |           |
| Is the non-conformity likely to impact upon the integrity of the affected SBP- |  | Yes 🗌     |
| certified products and the credibility of the SBP trademarks?                  |  | No 🛚      |

| NCR: 06/17  | NC Classification: minor   |  |
|---|--|--|
| Standard & Requirement:   | SBP Standard # 5, requirement 5a, 4.7.1  |  |
| -   | · · · · · · · · · · · · · · · · · · ·  |  |
| Description of Non-conformance and Related Evidence:  In the reporting period, the forklift loader KOMATSU FD25T17 was used for transportation and loading of big bags. The loader was refueling at the site of affiliate company TSLK LLC, located at the same production site. The working time of the loader is registered on a daily basis in way-bill. Pellet production chief gets on a monthly basis the report from TSLK LLC with actual volume of diesel used by loader. TSLK LLC then issues invoices to BP. During the reporting period, loader used 2599 I diesel and transported 12457 tones of pellet. Thus, the result is 0,208 I diesel/tone pellets. However the fuel consumption reported in Profiling, Batch and Energy data, is 0,329 I diesel/tone pellets.  В отчетном периоде для перемещения биг-бэгов использовался вилочный погрузчик |  |  |
| КОМАТSU FD25T17. Ежедневно время работы погрузчика в смену фиксируется в путевом листе. Ежемесячно от диспетчера по учету ГСМ TSLK LLC начальник производства получает данные о фактическом объеме заправленного в погрузчик. TSLK LLC ежемесячно выставляет счета-фактуры по использованному дизелю погрузчиком. В ревизионный период по представленным данным было использовано 2599 литров дизельного топлива, произведено 12 457 тонн пеллет. Таким образом, расход топлива составил 0,208 л дизельного топлива на тонну пеллет. Однако в документе Profiling, Batch and Energy data указан расход топлива — 0.329 л дизельного топлива на тонну пеллет.  |  |  |
| Corrective action request:  | Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance. |  |
| Timeline for Conformance:   | By the next audit, but not later than 12 months after report finalization date (01/03/2018) / До следующего ежегодного аудита, но не позднее 12 месяцев с даты утверждения отчета (01.03.2018)   |  |
| Evidence Provided by Organisation:  | Profiling, Batch and Energy Data file  |  |



| Findings for Evaluation of   | Организация внесла коррективы в документ Profiling, Batch |       |
|--|---|-------|
| Evidence:  | and Energy Data. Указан корректный расход дизельного      |       |
|  | топлива погрузчиком – 0,208 л дизельного топлива на тонну |       |
|  | пеллет  |       |
|  |   |       |
| NCR Status:  | OPEN / ОТКРЫТО  |       |
| Is the non-conformity likely to impact upon the integrity of the affected SBP- |   | Yes 🗌 |
| certified products and the credibility of the SBP trademarks? No ⊠             |   | No 🖂  |

#### **Observations**

| OBS: 01/17              | Standard & Requirement:  | SBP Standard # 2 requirement 19.3 |
|-------------------------|--|-----------------------------------|
|                         | Report Section   | 19.0                              |
| Description of findings | Initial Supply Base Report was re                                | viewed by independent and         |
| leading to observation: | competent peer reviewer, expert in wood processing, professor at |                                   |
|                         | Bratsk State University. New vers                                | ion of SBR was not sent to        |
|                         | independent and competent peer reviewer.                         |                                   |
|                         | Первоначальная версия отчета о ресурсной базе была передана      |                                   |
|                         | для независимого рецензирования эксперту в области               |                                   |
|                         | деревообработки, профессору Братского государственного           |                                   |
|                         | университета. Новая версия отчета о ресурсной базе на            |                                   |
|                         | '  | ецензирование не передавалась.    |
| Observation:            | BP is recommended to submit up                                   | dated SBR to independent and      |
|                         | competent peer reviewer.   |                                   |
|                         |  | редавать отчет о ресурсной базе,  |
|                         | в случае его обновления, на не                                   | зависимое рецензирование          |
|                         | компетентному эксперту.  |                                   |

| OBS: 02/17              | Standard & Requirement:  | SBP Instruction # 5A requirement     |
|-------------------------|--|--------------------------------------|
|                         |  | 3.7.6                                |
|                         | Report Section   |                                      |
| Description of findings | Separate calculation of diesel con                                   | sumption for feedstock haulage to    |
| leading to observation: | dryer is implemented, although in                                    | some cases not followed. Since       |
|                         | the wording of indicator specifies                                   | should but not shall, auditors raise |
|                         | Observation.   |                                      |
|                         | Процедура отдельного расчета расхода дизельного топлива для          |                                      |
|                         | доставки отходов лесопильного производства и коры для                |                                      |
|                         | теплогенератора внедрена, хотя в некоторых случаях не                |                                      |
|                         | соблюдается. Поскольку в индикаторе указано « <i>следует</i> », а не |                                      |
|                         | « <i>должно</i> », аудиторы выставилі                                | и Наблюдение.                        |
| Observation:            | Where fuel is procured specifically                                  | y for use in the dryer, its haulage  |
|                         | characteristics should be separate                                   | ely identified.                      |
|                         | В случае, если сырье для тепло                                       | генератора доставляется              |
|                         | отдельно, энергозатраты на его                                       | доставку следует определять          |
|                         | отдельно.  |                                      |



## Certification decision

| Based on Organisation's conformance with SBP requirements, the auditor makes the following |  |  |
|--|--|--|
| recommendation:  |  |  |
| $\boxtimes$  | Certification approved:                |  |
|  | Upon acceptance of NCR(s) issued above |  |
|  | Certification not approved:            |  |
|  |  |  |
| Based on auditor's recommendation and NEPCon quality review following certification        |  |  |
| decision is taken:   |  |  |
| NEPCon certification decision:   |  |  |
| Certification is maintained upon acceptance of major and minor NCRs raised in this report. |  |  |
| Certification decision by: 03.10.2017  |  |  |
| Date of decision: Olesja Puiso   |  |  |



## 12 Surveillance updates

### 12.1 Evaluation details

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

### 12.2 Significant changes

Certificate holder changed from Siberian Wood Pellets Ltd. - Ust-Kut production site to Trans-Siberian Forest Company Ltd.

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

Not applicable.

### 12.4 New non-conformities

See information about the new NCR identified during the surveillance audit in section 10 of the report.

### 12.5 Stakeholder feedback

No comments or complaint from the stakeholders had been received.

### 12.6 Conditions for continuing certification

To continue SBP certification, BP shall address major NCRs raised during this audit, within established deadline.

### 12.7 Certification recommendation

Audit team recommends maintaining the certification active.



## 13 Evaluation details

| Primary Responsible Person: (Responsible for control system at site(s)) | Mikhail Minaev, chief of pellet production   |
|---|--|
| Auditor(s):   | Nikolai Tochilov, Natalia Zaladinova, Roman Kurakin  |
| People Interviewed, Titles:   | Mikhail Minaev, chief of pellet production; Olga Bondarenko, chief expert; Yulia Krikhta, certification engineer; Mikhail Ignatiev, operator; Nikolay Averin, operator assistant; Elena Novitskaya, chief accountant |
| Brief Overview of Audit Process for this Location: Comments:            | Please see section 6.1 in this report above  |