

Control Union
Certifications B.V.
Evaluation of BIFESA S.L.
Compliance with the SBP
Framework: Public
Summary Report

Main (Initial) Audit

www.sbp-cert.org





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

For further information on the SBP Framework and to view the full set of documentation see www.sbp-cert.org

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1 Overview

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Current report completion date: 04/May/2019

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Certified Supply Base: Huelva, Seville and Cadiz provinces of the Andalucia Autonomous

Community, Spain

SBP Certificate Code: SBP-06-29

Date of certificate issue: 02/Aug/2019

Date of certificate expiry: 01/Aug/2024

This report relates to the Main (Initial) Audit



2 Scope of the evaluation and SBP certificate

The certificate scope covers the chipping activity in the forest and office in Huelva, Spain. The BP purchase the Feedstock in the forest already chipped logs, in such case the BP outsources the chipping activity in the forest. Feedstock used in the biomass production originates from Spain. A Supply Base Evaluation is included in the scope of the evaluation.

The following SBP standards are applicable and form the scope of the evaluation and thus, the SBP certificate: Standard 1, Standard 2, Standard 4 and Standard 5. All material is either SBP compliant through standard 1 SBE or PEFC certified or FSC certified materials. Control system used to define the output claims is physical separation.



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 the 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 and FSC system control points and an analysis of the existing PEFC and FSC CoC system;
- -- Interviews with responsible staff;
- -- Review of the records, calculations and conversion coefficients; and
- -- GHG data collection analysis.
- - SAR and profiling data collection analysis.
- -- "Instruction Document 5D: Dynamic Batch Sustainability Data v1.1 evaluation"



4 SBP Standards utilised

4.1 SBP Standards utilised

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

- ☑ SBP Framework Standard 1: Feedstock Compliance Standard (Version 1.0, 26 March 2015)
- ☑ SBP Framework Standard 4: Chain of Custody (Version 1.0, 26 March 2015)

4.2 SBP-endorsed Regional Risk Assessment

SBP Endorsed Regional Risk Assessment: not applicable.



5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

Bifesa SL is a biomass producer located in the city of Huelva and performing harvesting operations within the Huelva, Seville and Cadiz provinces of the Andalucia Autonomous Community.

Bifesa SL is a 30 years old, vertically integrated, company specialised in the production and delivery of wood products for different users: roundwood for pulpmills, wood chips for biofuel producers. It has multidisciplinary staff of around 80 people and 7 – 8 permanent harvesting teams. The harvesting teams consist of 2 to 8 people, which are mainly preforming harvesting manually, but sometimes by means of a harvester. Other machinery used in forest operations are: forwarders, skidders, forestry tractors and chipping machines.

Bifesa SL has a team of engineers, responsible for the technical processes. They organize the harvesting, chipping and transportation processes. Bifesa SL is mainly engaged in thinnings, prunnings, sanitary cuttings, selective fellings and final cuts of mature trees, as well as fire protection cuttings, and reforestation. In total, it harvests more than 50 000 tons of wood per year, of which around 30 000 tons is for biomass production. Regionally, Bifesa SL is considered a medium sized enterprize. Bifesa SL is the second biggest company in the region. The biggest forest company in the region is producing biomass for its own energy plant.

Bifesa is ISO 9001, ISO 14001 and OHSAS 18001 certified and these systems includes well developed mitigation measures that are applicable to the scope of SBP certification as well. For instance, waste management system was developed in line with ISO 14001, complaint management was established within ISO 9001 and, as mentioned above, health and safety control system works effectively due to OHSAS 18001 certification system implemented.

5.2 Description of Company's Supply Base

The Supply Base includes the regions of Huelva, Seville and Cadiz provinces of the Andalucía Autonomous Community, Spain.

In the Supply Base there are Mediterranean conifer forests (in the south-central region) with a clear presence of eucalyptus plantations. Other tree species within the Supply Base are native:

- Umbrella pine Pinus pinea;
- Maritime pine Pinus pinaster;
- White eucaliptus Eucaliptus globulus;
- Red eucalyptus Eucaliptus rostrate;
- Holm oak Quercus ilex;



- · Cork oak Quercus suber;
- · Sweet chestnut Castanea sativa.

Introduced species, such as eucalyptus (*Eucaliptus spp.*) are allowed in short rotation forestry, but on a very limited scale.

For biomass production, Bifesa SL is mainly working in conifer forests, mostly formed by Umbrella pine and Maritime pine, and in a very limited extend – in eucalyptus plantations.

Next table indicates the forest area, canopy-covered forest area, coniferous forest area and Umbrella pine forest area for Huelva, Seville and Cadiz province.

Supply Base	Total forest area (ha)	Coniferous forest area (ha)	Pinus pinea forest area (ha)
Huelva province	787.737	149.670	88.467
Cádiz province	373.670	70.997	41.964
Seville province	422.001	80.180	47.392
Total	1583.408	300.847	177.823

73% of the forest area in the Supply Base (Huelva province) is private property. The prevailing private forest property size of the Supply Base is around 60 ha, but the total of private forest areas is larger than the area of public forests. Public forests are larger in scale, but much less frequent.

The dominant use of the land is forestry. Land use is charachterized by a small number of large properties and a great number of small owners.

From a socio-economic point of view, people nowadays do not depend on forests. The forest industry is also not developed well within the regions of the Supply Base, in comparison to the rest of Spain. This is mostly due to the complex macrorelief (hills, slopes and mountains), which makes forestry operations very difficult.

The proportion of wood used for biomass production within the Supply Base is relatively the same compared to the other main variants of using the wood. Umbrella pine trunks (40% per tree) and eucaliptus trunks (75% per tree) are used for pulp and paper production. Only branches are used for biomass production (60% of pine trees, and 25% of eucalyptus trees). The production of wood pallets and boxes for the agricultural sector is another important final use of pine wood in the Huelva province. There are quite some sawmills in the region using sawnwood as well. However, other industries can hardly use twig wood, which, however, needs to be removed from forest lots because of the risk of forest fire. The only viable use for this raw material is the production of biomass.

Nowadays, most of the pine forests in the Supply Base area are abandoned and unmanaged. This is due to the low profitability of the forests, these forests are capitalized, divided by the slopes, which normally are difficult to enter with machinery. The final product (wood) is of low quality and the forest industry produces products with little added value.



SBP-compliant primary feedstock is the only product group that Bifesa SL has, within the scope of SBP certification. Bifesa SL prioritizes aquiering wood from forests harvested by it's own harvesting teams. It will be able to take exhaustive control of all the SBP indicators.

The tree species harvested for SBP biomass production include:

- Umbrella pine Pinus pinea 89%;
- Maritime pine Pinus pinaster 1%;
- White eucaliptus Eucaliptus globulus 5%;
- Red eucalyptus Eucaliptus rostrata 5%;

Bifesa SL does not harvest, or purchase any tree species included in the CITES or IUCN lists. The CITES list does not include any tree species from Spain. The IUCN list includes Common Ash (*Fraxinus excelsior*) under "Near Threatened" status and Horse Chestnut (*Aesculus hippocastanum*) as "Vulnerable".

5.3 Detailed description of Supply Base

Supply Base

Total Supply Base area (ha): 1583 408 ha (Cadiz: 373 670 ha + Huelva 787 737 ha + Sevilla

422 001 ha)

• Tenure by type (ha): Privately owned: 1 221 160 ha

Public: 362 248 ha

Forest by type (ha): 1583 408 ha temperate;

Forest by management type (ha): 394 149 ha plantation / 187 070 ha managed natural / 1 002

189 ha natural

• Certified forest by scheme (ha): FSC: 12 891,13 ha

PEFC: 13 084,1 ha

Feedstock

Total volume of Feedstock: 23 855,84 tonnes Volume of primary feedstock: 23 855,84 tonnes

· List percentage of primary feedstock

Comon name	Scientific name
Umbrella pine	Pinus pinea
Maritime pine	Pinus pinaster
White eucaliptus	Eucaliptus globulus



Red eucaliptus	Eucaliptus rostrata

- Certified to an SBP-approved Forest Management Scheme: 1 470,62 tons;
- Not certified to an SBP-approved Forest Management Scheme: 22 385,22 tons.

5.4 Chain of Custody system

The BP holds PEFC and FSC Chain of Custody certificate with physical separation method or transference system in the scope. All inputs are received as 100% PEFC certified or 100% FSC certified.

Material not included in the certification scope is sourced and managed physically segregated. The CoC scope covers the purchase of roundwood in the forest, chipping and transport of biomass to be sold in the Spanish ports detailed in the scope.

The BP purchase biomass mainly is purchased in logs, the biomass producer outsources the chipping process in the forest.

Purchased documentation (harvesting permit, origin, specie, etc.) is reviewed and validated by the BP prior to start the harvesting activities by Pedro Montero. Ones the material is received in the harbours, Pedro Montero double check all documentation from the supplier and the harbour to validate it. The biomass is stored in each harbour and controlled by an outsourced logistic company there.



6 Evaluation process

6.1 Timing of evaluation activities

The main assessment audit start on 22th of April and it was conducted in accordance with the audit agenda below (which had been provided to the BP prior to the audit).

Activity	Site	Date/Time
Stakeholders consultations	remote	22-03-2019
		Monday 29-04-2019
Opening meeting	Bifesa	9:00-9:15
Agreement on Scope	Auditor: LVF	9:15-9:30
Business integrity, social, health and safety requirements		09:30-11:00
Logo/Trademark use		11:00-11:15
Complaints procedures		11:15-11:20
Chain of Custody registrations		12:30-13:30
Lunch break		
Chain of Custody registrations		14:30-16:00
Final discussion / days closing meeting		17:45-18:00 Tuesday 30-04-2019
Day's Opening meeting	Bifesa Auditor: LVF	09:00-09:15
Wood transformation		9:15:00-10:45
Field verification of SBE	Suppliers	10:45-13:00
	Auditor: LVF	
Lunch break		
Field verification of SBE		14:00-17:45
Final discussion / days closing meeting	Bifesa Auditor: LVF	17:45-18:00
		Wednesday 01-05-2019



GHG data registrations	Off site	09:15-13:00
	Auditor: LVF	
Lunch break		
	A Plan	44.00.47.45
GHG data registrations (cont.)	Auditor:	14:00-17:45
	LVF	
		Thursday 02-05-2019
Day's Opening meeting	Bifesa	09:00-09:15
	Auditor: LVF	
Checking the documents		09:30-10:00
Supply Base report		10:00- 12:30
Suppliers		
Incoming material		
Checking the Supply Base Evaluation		
Lunch break		12:30-13:30
Output claims		13:30-14:30
Finalization SBE audit		14:30-15:30
Verification of missing items		15:30-17:30
Final discussion /closing meeting		17:30-18:00

Two FMUs were visited, the only ones that were in the extraction process, one of private propriety (DEHESA VIEJA CALAÑAS (HUELVA) EUCALYPTUS GLOBULUS 1 500,00 ton) and one of public property (COTO MAZAGON MOGUER (HUELVA) PINUS SP AND EUCALYPRUS 18 000,00 ton).

6.2 Description of evaluation activities

The audit started with an opening meeting on Monday April 29 at 9:00 with attendance from the Head of Biomass Department, the main responsible for SBP, FSC and PEFC CoC procedures and the external consultant.

The BP take's physical possession and has no production facilities, chipping takes place on the forest and the material goes directly from the forest to the harbour.

The audit consisted of review of procedures, control system, feedstock reception (at the harbour). Interviews were conducted with all staff relevant to the critical control points and key responsibilities in relation to the Biomass production (in forest) and sales of the certified products. The audit also included extensive documents review and check of calculations in regard to the GHG emission data reported by the BP.



The audit was concluded with a closing meeting with attendance by the external consultant and with the Head of Biomass Department and the General Technic Director. During the closing meeting the auditor presented the conclusions of the audit, including the Observations and a few points for follow--up.

The supporting documents provided sufficient evidence to close all the preconditions identified during the initial audit.

Names and affiliations of people interviewed		
Name:	Affiliation:	
Oliver Camocho Dvilés	Tecnic Director	
Pedro Garcia Montero	SBP Manager	
António David Rebolvo	Administrative Staff	
Juan Luis Tosacno	Tecnic Supervisor	
Diego Velazquez Garcia	Chainsaw Operator	
Diego Velazquez Colon	Chainsaw Operator	
José Lorenzo	Chainsaw Operator	
Eduardo Domingues	Chainsaw Operator	
Pedro Dominguez Garcia	Forwarder Operator	
Manual Garcia Aviles Truck driver		
Rafael Gabarro Salazar	Worker of Department de Ambient	
	Andalusia	

2. Critical control points, summary		
Identified CCP	Evaluation CCP	
Sourcing and input check	Check prior to sending the material by supplier and check upon request	
Reception and storage	Reception and storage of material based on credit control system.	
Volume control	Credit Control system	
Labelling	No trademark use	
Invoicing and shipping	Certified materials are either FSC, PEFC or SBP Compliant	

6.3 Process for consultation with stakeholders

The stakeholder consultation was started on 22th of March, 2019 by sending direct email to different stakeholder categories: state institutions, local NGOs, authorities, government bodies, forest owners associations, academic and research institutions.

The stakeholder notification letter is in the approved format of Control Union Certification.

The stakeholder consultation was send 30 days before starting the on site audit.

No comments were received.



7 Results

7.1 Main strengths and weaknesses

The main strength of the BP lies within relatively simple production and its use of primary material which is all received as PEFC Certified, FSC Certified and SBP Compliant. The Supply Base Evaluation is based on the strong control system by Spanish public or autonomous organizations. The BP only works with one customer (this number can be increased in the future, but the BP doesn't expect to work with a big number of customers) and the chain of custody downstream is short, thus access to necessary information regarding the forest management unit of origin can be easily confirmed. For weaknesses, please see the Observations in Section 10 of this report

7.2 Rigour of Supply Base Evaluation

BIFESA embarked on the development of a detailed Supply Base Evaluation which includes a clear description of their Supply Base Area. The geographical scope of the SBE is part of Andalusia (Huelva, Cadiz and Sevilla), Spain. The SBE was developed in joint efforts between internal personnel and a qualified consultant, using credible data sources. BIFESA existing management and monitoring systems are designed to ensure compliance with applicable laws and regulations. Risk was designated low for all core Indicators, with the exception of 1 Indicator which was designated as specified risk. BIFESA has developed additional controls and mitigation measures to manage this risk. The stakeholder consultation process involved consultations to key stakeholders with regard to information on SBP certification, SBP risk assessment and supply base report, by communicating this via email. The risk mitigation measures has been designed and implemented planned in cooperation with acknowledged experts and external consultants in relevant fields.

The supply base evaluation was a rigour process with some gaps identified (see observation part to this report).

7.3 Collection and Communication of Data

All energy and fuel use documentation for chipping and transport has been provided by the supplier or outsourcing companies in the forest.

7.4 Competency of involved personnel

Internal staff members are involved in the SBP system management and implementation. All interviewed responsible staff demonstrated awareness of their responsibilities within SBP system. The key responsible person for developing the SBE system is an external consultant with experience is producing SBP systems.

All involved personnel, including responsible staff at suppliers and sub-suppliers have demonstrated good knowledge in relevant fields (safety and health measures at work) during the site visits. Relevant certificates and diplomas were presented during the assessment and scope change audits. Qualification requirements for personnel involved in the SBE system are provided in documented procedures of the BP. In overall, auditors evaluate the competency of main responsible staff to be sufficient for implementing the SBP system with





primary material sourced within the SBE. This has been based on interviews, review of qualification documents, training records and set of procedures and documents that were composed for the SBP system as well as field observations during the audit.

7.5 Stakeholder feedback

Not received

7.6 Preconditions

All the preconditions were addressed by the organization and this was confirmed by CVA audit.



8 Review of Company's Risk Assessments

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

Control Union assessed the risk for each Indicator using the guidance in Section 11 of SBP Framework Standard 2: Verification of SBP--compliant Feedstock.

The risk assessment has been performed with the use of a technical expert. Determining the risk rating the likely impact of a non--compliance together with the probability of that noncompliance arising was used. And evaluated risk at both regional and the individual forest level.

Table 1. Final risk ratings of Indicators as determined BEFORE the SVP and any mitigation measures.

Indicator	Risk rating (Low or Specified)	
	Producer	СВ
1.1.1	Low	Low
1.1.2	Low	Low
1.1.3	Low	Low
1.2.1	Low	Low
1.3.1	Low	Low
1.4.1	Low	Low
1.5.1	Low	Low
1.6.1	Low	Low
2.1.1	Low	Low
2.1.2	Low	Low
2.1.3	Low	Low
2.2.1	Low	Specified
2.2.2	Specified	Specified
2.2.3	Low	Specified
2.2.4	Low	Low
2.2.5	Low	Low
2.2.6	Low	Low
2.2.7	Low	Low
2.2.8	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	СВ
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Specified	Specified
2.4.3	Low	Low
2.5.1	Low	Low
2.5.2	Low	Low
2.6.1	Low	Low
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Specified	Specified
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low



2.2.9	Low	Low
2.3.1	Low	Low
2.3.2	Low	Specified

Table 2. Final risk ratings of Indicators as determined AFTER the SVP and any mitigation measures.

Indicator	Risk rating (Low or Specified)	
	Producer	СВ
1.1.1	Low	Low
1.1.2	Low	Low
1.1.3	Low	Low
1.2.1	Low	Low
1.3.1	Low	Low
1.4.1	Low	Low
1.5.1	Low	Low
1.6.1	Low	Low
2.1.1	Low	Low
2.1.2	Low	Low
2.1.3	Low	Low
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Low	Low
2.2.4	Low	Low
2.2.5	Low	Low
2.2.6	Low	Low
2.2.7	Low	Low
2.2.8	Low	Low
2.2.9	Low	Low
2.3.1	Low	Low
2.3.2	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	СВ
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Low	Low
2.4.3	Low	Low
2.5.1	Low	Low
2.5.2	Low	Low
2.6.1	Low	Low
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Low	Low
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low



9 Review of Company's mitigation measures

BIFESA has implemented mitigation measures for 1 indicator evaluated as specified risk during the assessment.

The SBE was performed for the first time in (2018). The found sustainability risks are clear. However, the practical implementation of the risk mitigation measures is a continuous process. It includes the assessment of risks and risk mitigation measures specifically related to safety and health measures at work within the Supply Base. BIFESA had the mitigations measures already in place.

To address all possible risks, additions were made to several documents. Very important to inform the workers prior to harvesting.

It chose for an approach that SBE approves only those feedstock suppliers that show outstanding results on risk indication and mitigation.

BIFESA approve its own harvesting teams.

It was revealed during the supplier visits that the BP has sufficient knowledge on safety and health measures at work as well as good timber harvesting practices. The sampling process is considered sufficient to verify suppliers of primary feedstock (Visit to a public owner and to a private owner).

Bifesa's management system ensures low risks for legality and sustainability issues.

For instance, although there is a low risk, it is additionally implemented that no work can be carried out before the ownership is established. Authorization for harvesting or a forest management plan are always collected in advance of harvesting work performed. These documents cannot be issued by the authorities if ownership is not well established. These documents also reflect all restrictions regarding sustainability issues, for instance, habitats and biodiversity concerns in the forest in question, time limitations for work performance (due to breeding time for protected species or high fire risks), silviculture methods ensuring no damage to the environment and ecosystems, prescriptions of machinery that is allowed to be used in the forest area, and other.

There were three specified risks identified on the level of the country: 2.2.2, 2.4.2 and 2.8.1.

Indicator 2.2.2 related to soil quality is considered specified risk as there is a high risk of soil erosion on the level of the country, especially in the mountain area. However, Bifesa's management system ensures that this risk is taken into consideration: no clear cuts are performed, only thinnings that proved to be an effective mitigation measure. Only best forest management practices are implemented and only approved machinery suitable for the work on the slopes is used.

Indicator 2.4.2 in respect of fire risk is considered specified risk on the level of the country, however, Bifesa's management system is has always the following mitigation measures implemented: fire protection equipment is always in place of every harvesting operation, harvesting is performed only during the allowed time of the day, forest residues are removed from the harvesting site.



Indicator 2.8.1 related to health and safety of forestry workers is also considered specified at the level of the country, however, Bifesa has a robust control system implemented for OHSAS 18001 certification. This proves to be very effective and the results of this system are reflected in the reduction of number of accidents. In spite of this, is was considered that it is impossible to exclude this risk and the risk was considered specified. Small accidents could occur in the forest due to the uneven soil surface.

Together with mentioned above, Bifesa is ISO 9001, ISO 14001 and OHSAS 18001 certified and these systems includes well developed mitigation measures that are applicable to the scope of SBP certification as well. For instance, waste management system was developed in line with ISO 14001, complaint management was established within ISO 9001 and, as mentioned above, health and safety control system works effectively due to OHSAS 18001 certification system implemented.

The audit team initial consider a potential specified risk also the indicators: 2.2.1; 2.2.3 and 2.3.2, considering the experience of the audit team for neighbouring countries and with similar forest characteristics. After audit consider date the clarification of the mitigation measures in the SBE is sufficient to demonstrate the commitment with the fallowing mitigation measures:

- Environmental impact assessment reports
- o Authorization for Harvesting with verification of the regional authorities.
- Best practices in forest management with control of the responsible for each team with interviews.
- Technical specifications for the award of the contract for work in public forests with concretes recommendations for each authorization.
- Contracts with suppliers obliging BIFESA

And the observation of this report (10. Non-conformities and observations) can finish any potential doubt.



10 Non-conformities and observations

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

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

NC number 2019-01	NC Grading: Observation	
Standard & Requirement:	Standard 1 – 2.2.1	
Description of Non-conformance and Related Evidence:		
It was verified through interviews with workers and coordinators that BIFESA carries out monitoring operations, although they are low risk points. Check the pertinence of documenting these monitoring actions."		
Timeline for Conformance:	By the next surveillance audit, but no later than 12 monhts from report finalisation date	
Evidence Provided by Company to close NC:	Click or tap here to enter description provided by Company to close the NC.	
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.	
NC Status:	Open	

NC number 2019-02	NC Grading: Observation	
Standard & Requirement:	Standard 4 – 5.2.2	
Description of Non-conformance and Related Evidence:		
Click or tap here to enter NC description.		



Timeline for Conformance:	By the next surveillance audit, but no later than 12 monhts from report finalisation date
Evidence Provided by Company to close NC:	Click or tap here to enter description provided by Company to close the NC.
Findings for Evaluation of Evidence:	Click or tap here to enter findings for evaluation of evidence by the auditor.
NC Status:	Open



11 Certification decision

Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:		
Certification decision:	Certification approved	
Certification decision by (name of the person):	Hubert Jurczyszyn	
Date of decision:	02/Aug/2019	
Other comments:	Click or tap here to enter text.	