

NEPCon Evaluation of Pusbroliai UAB Compliance with the SBP Framework: Public Summary Report

Main (Initial) Audit

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

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

Document history

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Table of Contents

1	Overview
2	Scope of the evaluation and SBP certificate
3	Specific objective
4	SBP Standards utilised
4.2	SBP-endorsed Regional Risk Assessment
5	Description of Company, Supply Base and Forest Management
5.1	Description of Company
5.2	Description of Company's Supply Base
5.3	Detailed description of Supply Base
5.4	Chain of Custody system
6	Evaluation process
6.1	Timing of evaluation activities
6.2	Description of evaluation activities
6.3	Process for consultation with stakeholders
7	Results
7.1	Main strengths and weaknesses
7.2	Rigour of Supply Base Evaluation
7.3	Collection and Communication of Data
7.4	Competency of involved personnel
7.5	Stakeholder feedback
7.6	Preconditions
8	Review of Company's Risk Assessments
9	Review of Company's mitigation measures
10	Non-conformities and observations
11	Certification decision

1 Overview

CB Name and contact:	NEPCon OÜ, Filosoofi 31, 50108 Tartu, Estonia
Primary contact for SBP:	Ondrej Tarabus ot@nepcon.org, +420 606 730 382
Current report completion date:	06/Dec/2019
Report authors: :	Gerimantas Gaigalas
Name of the Company:	UAB "Pusbroliai"
Company contact for SBP:	Gintautas Juška, director
Certified Supply Base:	sourcing from Lithuania
SBP Certificate Code:	SBP-07-39
Date of certificate issue:	09/Dec/2019
Date of certificate expiry:	08/Dec/2024

This report relates to the Main (Initial) Audit

2 Scope of the evaluation and SBP certificate

Scope of this evaluation is based on SBP standards 2; 4; and 5.

Scope description:

Production of biomass (wood chips) for use in energy production at the place of supplier. The Organization holds mobile machines, which come to the place of harvest or the place of secondary or tertiary supplier and on spot produce biomass from fuel wood, barks, wood chips, sawdust, pallets and skids (post-consumer), twigs with FSC 100% and FSC Mix Credit claims and using the credit system plans to sell it as SBP compliant biomass. The organization doesn't have the permanent production site as it uses mobile machines, which produce biomass in the place of harvest or the place of secondary or tertiary supplier. In addition, the Organization plans to act as trader of wood pallets (using FSC Mix Credit claim – SBP compliant). The scope of the certificate does not include Supply Base Evaluation.

3 Specific objective

“The specific objective of this evaluation was to confirm that the Biomass Producer’s management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification.

The scope of the evaluation covered:

- Review of the BP’s management procedures;
- Review of the production processes, production site visit;
- Review of FSC system control points, analysis of the existing FSC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients;
- SAR, SREG and profiling data collection analysis;

4 SBP Standards utilised

4.1 SBP Standards utilised

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

- SBP Framework Standard 1: Feedstock Compliance Standard (Version 1.0, 26 March 2015)
- SBP Framework Standard 2: Verification of SBP-compliant Feedstock (Version 1.0, 26 March 2015)
- SBP Framework Standard 4: Chain of Custody (Version 1.0, 26 March 2015)
- SBP Framework Standard 5: Collection and Communication of Data (Version 1.0, 26 March 2015)

4.2 SBP-endorsed Regional Risk Assessment

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

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

UAB “Pusbroliai” is a biomass producer with the office in Klaipėda, Lithuania. The Organization holds mobile machines, which come to the place of harvest or the place of secondary or tertiary supplier and on spot produce biomass from fuel wood, barks, wood chips, sawdust, pallets and skids (post-consumer), twigs with FSC 100% and FSC Mix Credit claims and using the credit system plans to sell it as SBP compliant biomass. The organization doesn't have the permanent production site as it uses mobile machines, which produces biomass in the place of harvest or the place of secondary or tertiary supplier. The produced biomass by vehicles are transported to the place of sale points. In addition, the Organization plans to act as trader of wood pallets (using FSC Mix Credit – SBP compliant). Biomass (wood chips) are planned to be sold through Klaipėda port in Lithuania (under FOB) and the wood pallets (as trader) through Klaipėda port in Lithuania and Riga port in Latvia (under FOB). Production capacity 80 000- 150 000 m³ of biomass.

The BP is having FSC credit system designated in its FSC system. For biomass production only FSC certified material is used (with claim FSC 100% and FSC Mix Credit) from primary, secondary and tertiary suppliers. The organization has 10 FSC certified suppliers from Lithuanian state forests (under their FSC-FM/CoC certificate), 3 FSC certified suppliers from Lithuanian private forests (under their FSC-FM/CoC certificate), 6 traders from Lithuania, 3 secondary producers from Lithuania and 1 tertiary producer from Lithuania. At the moment all suppliers are from Lithuania, however in the future the Organization has the plan to buy secondary material from Latvia. The feedstock can contain material from Belarus, however is not directly purchased but comes and is verified through supplier declarations and field visits. For the moment no material comes from Belarus, but it could come in the future. The amount of biomass produced according to FSC credit system might be sold as SBP-compliant. In addition, the Organization plans to act as trader of wood pallets. Biomass (wood chips) are planned to be sold through Klaipėda port in Lithuania (under FOB) and the wood pallets (as trader) through Klaipėda port in Lithuania and Riga port in Latvia (under FOB).

After the production biomass by vehicles are transported to the place of sale points.

5.2 Description of Company's Supply Base

Lithuania

Forests cover amounts to 33.3 per cent of the territory of the Republic of Lithuania and forest land constitute an area of 2 177 000 hectares as of 1st January 2014. Expansion of the forest area has been one of the main objectives of Lithuanian forestry policy over the last years. Due to the implementation of sustainable forest management and national afforestation measures, forest coverage in Lithuania has increased by 2 per cent since 2003. Approximately a half of forest land in Lithuania is owned by the State and managed by 42 State Forest Enterprises and the Directorate General of State Forests. Respectively, around 40 per cent of forest land is privately owned and the rest 10 per cent is still reserved for restitution.

Occupying 1 152 400 ha, coniferous stands prevail in Lithuania, covering 56.1 per cent of the forest area. They are followed by softwood deciduous forests (827 500 ha, 40.3 per cent) and hardwood deciduous forest (75 800 ha, 3.7 per cent). The dominant tree species are pine (occupying 720 300 ha) and spruce (429 600 ha). Birch stands are prevalent among deciduous trees, covering an area of 459 700 ha.

Sustainable forest management is the overriding objective for forest policy and practice in Lithuania. Therefore, forest resources are used responsibly, and annual timber harvest rate does not exceed the annual increment. Lithuania's forests produce around 18 million m³ of stem wood (over bark). Annual felling do not exceed 60 per cent of gross total annual increment.

Forests are divided into groups upon the objectives of the economic activities, their regime and the major functional purpose.

Group I – strict reserves forests. These are the strict reserves and small strict reserves forests on the territories of state strict nature reserves, state parks and biosphere monitoring territories. Objective of economic activities – to preserve the forests for a natural growth.

Group II – forests of special purpose, split into the following: A – ecosystem protection forests. Landscape, botanical, forest genetic, zoological, botanical-zoological reserves and reserves of these types in state parks

and biosphere monitoring territories. Objective of economic activities – to preserve or restore forest ecosystems or separate ecosystem components. B – recreational forests. Recreational forests cover forest parks, urban (city) forests, forests of recreation zones of the state parks, recreational forest areas and other forests defined for recreation. Objective of economic activities – to form and preserve the recreational forest environment.

Group III – protective forests. These are the forests in the territories of geological, geomorphological, hidrographical, and cultural reserves, forests of protection zones. Objective of economic activities – to form productive forest stands capable of performing the functions of protection of soil, air, water and human living surroundings.

Group IV – commercial forests, split into the following: A – commercial forests of normal cutting age. Objective of economic activities – to form productive forest stands and supply wood continuously following the requirements of environmental protection; B - forest plantations. Objective of economic activities – to grow as much wood as possible in the shortest period of time.

FSC and PEFC certificates are used in Lithuania.

In November 2016 total FSC Certified Forest Area in Lithuania was 1,085,548 hectares and 263 Chain of Custody Certificates. (FSC Facts & Figures, November 3, 2016)

In September 2016 there were 9 PEFC Chain of Custody Certificates. (PEFC Global Statistics: SFM & CoC Certification, September 2016).

CITES came into force in Lithuania on 09/03/2002.

Resources:

<http://www.am.lt/VI/en/VI/index.php#a/759>

PEFC Global Statistics: SFM & CoC Certification, September 2016 FSC Facts & Figures, November 3, 2016

Latvia

In Latvia, forests cover area of 3,07 million ha. According to the data of the State Forest Service (concerning the surveyed area allocated to management activities regulated by the Forest Law), woodness amounts to 52 %. Latvia is one of the most forested EU member states.

The Latvian State owns 1,5 million ha of forest (49 % of the total forest area), while the other 1,57 million ha (51. % of the total forest area) belong to other owners. Forests owned by the state are managed by state stock company Latvijas Valsts Meži (Latvian State Forests). Private forest owners in Latvia amount to approximately 144,000.

Forest land consists of:

- forests 3,07m ha (91.3%);;
- marshes 0,18m ha (5.3%);;
- open areas 0,035m ha (1.1%);;

- flooded areas 0,018m ha (0,5%);
- objects of infrastructure 0,062m ha (1.8%).

For most of forest the dominant tree species are coniferous trees - pine and spruce. Latvia forests mainly consists of coniferous trees, but significant part is also occupied by other species.

Forest area by dominant species:

- pine 35%;
- spruce 18.1 %;
- birch 30.6 %;
- gray alder 7.2 %;
- black alder 2.9 %;
- aspen 5.0 %;
- oak 0.3%;
- ash 0.5%;
- other species 0.3 %.

The amount of forestland is constantly expanding, both naturally and thanks to afforestation of infertile land and other land that is not used for agriculture. In historical terms, the intensive use of Latvia's forests for economic purposes began comparatively later than in many other European countries, and that has allowed to preserve extensive biological diversity. Limitations on economic activity apply to 12% of Latvia's forests at this time, and most of this territory is owned by the state. 683 especially protected environmental territories have been set aside to protect nature. Many of the areas have been included in the European network of protected areas Natura 2000. In order to ensure the protection of a specially protected species or a biotope outside specially protected nature territories, micro-reserves are created, if any of the functional zones does not provide it. According to the State forest service, the total area of the micro-reserves in October 2016 was 43 217.30 ha.

The forest sector in Latvia is under the supervision of the Ministry of Agriculture. It works with stakeholders to draft forest policies, development strategies for the sector, as well as regulations on forest management, the use of forest resources, environment protection and hunting. The state forest service, under the ministry of agriculture, is the responsible agency for supervising how the provisions of the laws and regulations are observed in forest management irrespective of the ownership type.

State-owned forests are managed by stock Company "Latvian State Forests", which was established in 1999. It implements the state's interests in terms of preserving and increasing the value of the forest and enhancing the contributions of the forest to the national economy. During the past decade, forest owners and

manufacturing companies in Latvia have sought to receive certification of the sustainable use of forest resources. Forest management processes and timber product delivery chains in Latvia are certified on the basis of the two most widely used systems in the world – FSC and PEFC. This proves that the country's forests are managed according to internationally acknowledged standards of good forestry.

In September 2016 total PEFC Certified Forest Area in Latvia was 1,683,604 hectares and 44 Chain of Custody Certificates. (PEFC Global Statistics: SFM & CoC Certification, September 2016). In November 2016 total FSC Certified Forest Area in Latvia was 1,299,477 hectares and 300 Chain of Custody Certificates. (FSC Facts & Figures, November 3, 2016)

CITES came into force in Latvia on 12/05/1997.

Resources:

www.zm.gov.lv <http://www.vmd.gov.lv/valsts-meza-dienests/statiskas-lapas/-meza-apsaimniekosana;>
<http://www.liaa.gov.lv/en/trade/industry-profiles/forest-industry;>
PEFC Global Statistics: SFM & CoC Certification, September 2016;
FSC Facts & Figures, November 3, 2016.

Belarus

In Belarus forests cover area of 9,5 milj hectares. According to the data of the State Forest Ministry Woodeness amounts to 39,3 % Forest industry input into IKP is 1,1%; The area covered by forest is increasing. The expansion happens both naturally and by afforestation of infertile land unsuitable for agriculture. Within the last decade, the timber production in Belarus has fluctuated aprox., 11 million cubic metres (<http://www.mlh.by>, 2015.)

Total land area 20,748; Inland water bodies 12; Total area of country 20,76 Source: <http://www.mlh.by>, 2015.

Distribution of forests by the dominant species: • pine 50,4%; • spruce 9,2%; • birch 23,1%; • black alder 3,3%; • grey alder 3,3 %; • aspen 2,1%; • other species 3,3%.

Source: <http://www.mlh.by>, 2015.

Timber production by types of cuts, by volume produced (2013): • final cuts 34,5 %; • thinning 45,79 %; other types of cuts 19,62 %. Source: <http://www.mlh.by>,

Biological diversity

Belarus has been a signatory of the CITES Convention since 1995. CITES requirements are respected in forest management, although there are no species included in the CITES lists in Belarus. Forest regeneration is carried out annually over an area of 32,000 ha, including 81% of the forest planting and seeding and 19% by natural regeneration. <http://belstat.gov.by/> (2015.y.) There are 2 strictly protected Nation reserves and 4 National parks present in Belarus at the moment. Area of National reserves accounts 2,98 mill ha and area of National parks is 3,98-mile ha.

Forest and community

In 2014 in all kinds of felling there were harvested 12,5 million m³ marketable timber. Foreign trade surplus made USD 104 million. 1.9 million cubic meter round timber and 191.8 thousand cubic meter sawn timber were

sold abroad. Forest products and services were exported to 25 states, including 95,3% to the near abroad and 4,7% to the remote countries. Among the main forest export directions are Poland (47,9% of the total export volume in value terms), Germany (11,4%), Lithuania (10%), Latvia (8,62%), the Netherlands (3,3%), Belgium (3,46%), Sweden (3,25%).

All forest area is certified by PEFC certification scheme.

5.3 Detailed description of Supply Base

For biomass production only FSC certified material is used (with claim FSC 100% and FSC Mix Credit) from primary, secondary and tertiary suppliers. The organization has 10 FSC certified suppliers from Lithuanian state forests (under their FSC-FM/CoC certificate), 2 FSC certified suppliers from Lithuanian private forests (under their FSC-FM/CoC certificate), 6 traders from Lithuania and 5 secondary producers from Lithuania. All suppliers are from Lithuania. The feedstock can contain material from Latvia, and Belarus, but not directly purchased but comes and is verified through supplier declarations and field visits.

Total Supply Base area (ha): Latvia 3,05 mill. Lithuania 2, 17 mill Belarus 7,894 mill.

Tenure by type (ha): Latvia 2,65 mill. state forests; 2,63 mill. private forests. Lithuania 238 000 ha forests reserved for restitution, 858000 ha private forests, 1,08 1mill. ha forest state forest; Belarus 7,894 mill. ha state forests privately owned/public/community concession

Forest by type (ha): all boreal forests

Forest by management type (ha): 13,114 million ha managed semi-natural

Certified forest by scheme (ha): FSC, total certified area 1,140 million ha (FSC), 1,020 million ha (PEFC)

Number of suppliers: 23

Controlled Feedstock 0%

SBP-compliant Primary Feedstock 20%

SBP-compliant Secondary Feedstock 60%

SBP-compliant Tertiary Feedstock 20%

SBP non-compliant Feedstock 0%

Species *Picea abies* (L.) H. Karst.; *Pinus sylvestris* L.; *Alnus glutinosa* (L.) Gaertn.; *Alnus incana* (L.) Moench; *Populus tremula* (L.); *Betula pendula* (Roth); *Betula pubescens* (Ehrh.)

5.4 Chain of Custody system

The Organisation holds valid FSC Chain of Custody NC-COC-014491 certificate covering office and mobile production process of biomass. The Organisation is certified since November 13, 2019. The Organization holds mobile machines, which come to the place of harvest or the place of secondary or tertiary supplier and

on spot produce biomass from fuel wood, barks, wood chips, sawdust, pallets and skids (post-consumer), twigs with FSC 100% and FSC Mix Credit claims and using the credit system, plans to sell it as SBP compliant biomass. The BP is having FSC credit system designated in its FSC system. For biomass production only FSC certified material is used (with claim FSC 100% and FSC Mix Credit) from primary, secondary and tertiary suppliers. Tertiary feedstock (pallets and skids) doesn't come with the claim but is controlled according to FSC standard for reclaim material FSC-STD-40-007 V2-0 and is classified as post-consumer. After it is processed by mobile machines on the side of the supplier, it comes as wood chips. The amount of biomass produced according to FSC credit system might be sold as SBP-compliant. In addition, the Organization plans to act as trader of wood pallets. The amount of wood pallets (using FSC Mix credit claim / SBP compliant) according to FSC transfer system might be sold as SBP-compliant.

6 Evaluation process

6.1 Timing of evaluation activities

Two audit dates were needed for completion of this audit (1.2 days onsite and 0.8 days for documentation check)

Activity	Location	Date/time
Energy use calculations review	NEPCon office	10/10/2019 9.00 – 12.15
Documents and procedures review (SBR, Biomass Profiling Data, SBP procedures)	NEPCon office	11/10/2019 13.00 – 16.45
Opening meeting	Office	24/10/2019 9.00-9.15
Documents and procedures review Inputs and outputs review	Office	9.15-11.00
Energy use calculations review	Office	11:00 – 14:00
Chain of custody review (site tour), interview with responsible persons	Office, Production facilities on spot	14:00-15:15
Staff interviews	Office, Production facilities on spot	15:15-16:00
Visit to supplier	UAB “Vara”	16.00-17.00
Closing meeting (pre - final)	Office	17:00 – 17:30
Visit of tertiary supplier	UAB “Atliekų rūšiavimo centras (tertiary supplier)	07/11/2019 15.00-16.30
Closing meeting (final)	NEPCon office	07/11/2019 16.30-17.00

6.2 Description of evaluation activities

Auditor(s), roles	Qualifications
<p>Gerimantas Gaigalas</p> <p>Lead auditor Evaluation against all applicable requirements</p>	<p>He has Master ‘s degree on Forestry (graduated in Lithuanian Academy of Agriculture), BSc degree in Law and Master ‘s degree in International Law (graduated in University of Mykolas Romeris) and diploma in programming (Electronic College in Vilnius). He has experience leading the International Relations and Agreements Division in the Ministry of Environment as well as experience working in United Nations Development Programme (UNDP) Papua New Guinea regional office and Institute of Environment Sustainability of EU Commission in Italy. Gerimantas has successfully passed Forest Management and Chain of Custody lead auditor training. Gerimantas is working in UAB "NEPCon LT" as certification manager since 2013. Since 2014 he is implementing PEFC CoC audits, in 2013 completed PEFC CoC auditor training according to the new Chain of Custody standard. In 2016, he got the SBP lead auditor qualification and started to audit according to SBP scheme.</p>

Impartiality commitment: NEPCon commits to using impartial auditors and our clients are encouraged to inform NEPCon management if violations of this are noted. Please see our Impartiality Policy here: <http://www.nepcon.org/impartiality-policy>

The audit 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 audit:

October 24, 2019.

Auditor was welcomed in UAB "Pusbroliai" office in Klaipėda. Auditor started with an opening meeting attended by director, who is the main responsible person for SBP. Auditor provided information about audit plan, methodology, auditor qualification, confidentiality issues, auditing methodology and clarified the audit scope.

During the audit, the auditor evaluated existing production. After that auditor went through all applicable requirements of the SBP standards No. 2, 4, 5, existing chain of custody and management system, CoC, record keeping / mass balance requirements, emission, energy data, and categorisation of input and verification of SBP compliant feedstock/ biomass. During the process, overall responsible person for SBP system and over responsible staff having key responsibilities within the system were interviewed.

Field visit to mobile production side as well as the field verification audit of one supplier (UAB "Vara") as done at the second half of the day. The applicable records were reviewed, production staff was interviewed. At the end of the day the preliminary results were presented.

November 7, 2019

The tertiary supplier was visited in order to check how the Organization verifies on side the post-consumer material and handles all necessary procedures and checks the relevant documentation. At the end of the day the preliminary results were presented.

6.3 Process for consultation with stakeholders

The stakeholder consultation was carried out on 10th of September 2019 by sending direct email to different stakeholder categories: state institutions, local NGOs, authorities, government bodies, forest owners associations, academic and research institutions. No comments from the stakeholders were received. The stakeholder notification letter is added as an Exhibit to this report.

7 Results

7.1 Main strengths and weaknesses

Main strengths: all processes have been well documented; main database for material balances is well maintained and all relevant information can be reported. Very simple supply chain.

Weaknesses: No practice in selling SBP certified material.

7.2 Rigour of Supply Base Evaluation

Not applicable

7.3 Collection and Communication of Data

BP has a system to gather and record energy data. During the audit, BP made detailed overview of the systems and databases to gather and record such data. Evidence was provided to auditors.

7.4 Competency of involved personnel

Overall responsible person for implementing SBP is Director. SBR was reviewed by the Director. The peer review of SBR was done by Janis Rozitis, Pasaules Dabas Fonds (WWF associated partner)- experience in sustainable forestry practice and Sigitas Girdziušas- Lithuanian Agricultural University, Master of Forestry, forestry specialists. No comments received.

Overall responsible person has all required competences, education and work experience from timber and industry sector.

According to interviews, review of biomass producer sales manager's CV and set of procedures and documents that were composed for the SBP system, auditors evaluated the competency of main responsible staff to be sufficient.

7.5 Stakeholder feedback

No comments or concerns were received during the Biomass Producer's and CB-s stakeholder notification period that was conducted before reinstatement.

7.6 Preconditions

No open preconditions.

8 Review of Company's Risk Assessments

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

Not applicable

9 Review of Company's mitigation measures

Not applicable

10 Non-conformities and observations

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

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

NC number 01/19	NC Grading: Minor
Standard & Requirement:	Standard #2: Verification of SBP-compliant feedstock The BP shall record the place of harvesting and the identity of the primary wood processor responsible for the supply of inputs classified as SBP-compliant Secondary Feedstock. (6.2)
Description of Non-conformance and Related Evidence:	
All secondary feedstock suppliers are FSC certified and have supplier agreements. The distance and means of transportation are verified by BP and corresponds to declared origin and the material of secondary suppliers comes from Lithuania (in the future the Organization plans to include material from Latvia as well). The feedstock can contain material from Latvia and Belarus, but not directly purchased. For the moment no material comes from Belarus, but it could come in the future. Supplier list is available. Additionally, to this BP is requesting suppliers to sign supplier origin confirmation agreement. Agreements with the active suppliers are signed. In the SBP procedures it is foreseen that once per year the BP conducts suppliers audits in order to check the origin. During the audit one supplier verification audit was done of the supplier UAB "Vara". The supplier is FSC certified and suppliers' chips with FSC100% claim. The supply base and origin were confirmed checking its suppliers list and purchase documentation (delivery notes, transportation documents and cutting licenses) and proved the supply area is Lithuania and Latvia. However, out of 13 secondary suppliers, only 7 supplier verification audits, were conducted before assessment. The supplier audits for remaining secondary feedstock suppliers, were not done yet, but only planned during this year. Considering that the origin was not yet confirmed and demonstrated for all secondary feedstock suppliers, the auditor decided to rise minor non-conformance.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	PENDING
Findings for Evaluation of Evidence:	PENDING
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):	Ondrej Tarabus
Date of decision:	06/Dec/2019
Other comments:	N/A