

# NEPCon Evaluation of Se- Ba Orman Ürünleri San. Tic. Ltd. Şti. 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](http://www.sbp-cert.org)*

### *Document history*

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# 1 Overview

CB Name and contact:	NEPCon OÜ, Filosoofi 31, 50108 Tartu, Estonia
Primary contact for SBP:	Ondrej Tarabus otarabus@nepcon.org, +420 606 730 382
Current report completion date:	28/Nov/2019
Report authors: :	Çirts Karss
Name of the Company:	Se-Ba Orman Ürünleri San. Tic. Ltd. Şti., Çanakkale Organize Sanayi Bölgesi 6. Cadde No:1, 17100 ÇANAKKALE – Turkey
Company contact for SBP:	Elvan I. Göynüer, tel. +90 286 213 6605, e.goyner@sebabioenergy.com
Certified Supply Base:	Turkey, Çanakkale province
SBP Certificate Code:	SBP-07-42
Date of certificate issue:	19/Dec/2019
Date of certificate expiry:	18/Dec/2024

This report relates to the Main (Initial) Audit

## 2 Scope of the evaluation and SBP certificate

The certificate scope covers Se-Ba Orman Ürünleri San. Tic. Ltd. Şti. production site and office in Çanakkale Organize Sanayi Bölgesi 6. Cadde No:1, 17100 Çanakkale Turkey

Se-Ba Orman Ürünleri San. Tic. Ltd. Şti. is a biomass processor - pellet producer. The BP produces both premium class and industrial grade wood pellets mainly from secondary feedstock. The BP sources raw material (only secondary feedstock – sawdust) from several suppliers – sawmills in the province of Çanakkale, Turkey. The origin of the feedstock is the province of Çanakkale, Turkey.

The Organisation holds FSC Chain of Custody certificate TT-COC-006548. The certificate covers FSC chain of custody certification for feedstock. It is planned the BP will source all secondary feedstock with FSC certification claim. Also, the primary feedstock is planned to be used for production of SBP-Compliant biomass. It is also possible, that in the future primary feedstock – chips from logging residues will be used for production of industrial grade wood pellets

At the time of on-site audit the organisation is not yet sourcing FSC certified input and is expecting the supplier - the regional forest management company (General Directorate of Forestry – Çanakkale Regional Directorate of Forestry) to obtain the FSC Forest Management certificate, which is in the process of finalizing

The BP is planning to sell pellets on FOB/CIF conditions in port in Çanakkale city. The BP is renting a storage site for pellets under control of the organization.

The scope of the SBP certificate covers: production of wood pellets, for use in energy production. 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 existing production processes,
- Production and loading site visits;
- Review of FSC Chain of Custody system critical control points, analysis of the FSC CoC system;
- Interviews with responsible staff and review of records of the system;
- Review of the records, calculations and conversion coefficients;
- analysis of GHG data collection and reporting system;

## 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

The organization operates a pellet mill and acts as a Biomass Producer with production of wood pellets from secondary feedstock in the town of Çanakkale, Çanakkale, Turkey (Çanakkale Organize Sanayi Bölgesi 6. Cadde No:1, 17100 Çanakkale Turkey). The biomass processing plant has been commissioned in May 2019 and had produced first batches of pellets for 4 months. The feedstock for the production of wood pellets is sourced from a sawmill located next to the pellet mill via pipeline and from other suppliers of secondary feedstock – primary timber processors in the region. The feedstock includes material from a Supply Base consisting areas fully contained within the province of Çanakkale.

The BP is planning to source secondary feedstock for the pellet production. For production of biomass the BP is using secondary feedstock containing wood industry residues – sawdust . No tertiary feedstock (dry sawdust with shavings) is planned to use as feedstock. It is planned to extend the range of suppliers and include several more suppliers located in the province of Çanakkale. For production of industrial grade wood pellets the BP is also planning in future to use the primary feedstock – chips from logging residues.

The BP is planning to source all feedstock with FSC certification claim as soon as the Çanakkale regional forestry will acquire FSC Forest management certificate. Thus, the BP is planning to source FSC certified feedstock mainly.

The scope of the certification does not include storage sites, but the organization is operating a logistics site in the port of Çanakkale. Feedstock to the biomass production plant is delivered by pneumatic pipeline from the nearby sawmill and the rest by road transport – bulk carrier trucks. Ready-made pellets will be transported by bulk carrier trucks to logistics site where pellets will be unloaded in warehouse for following storage and sales on FOB/CIF Çanakkale port conditions.

The information about feedstock origin is expected to be available from agreements signed with all feedstock suppliers with requirement to provide the access to the information about origin.

The BP is implementing FSC transfer volume control system. It is expected all amount of the feedstock will be FSC certified and the all volume of wood pellets produced will be sold as SBP-compliant biomass.

### 5.2 Description of Company's Supply Base

Se-Ba Orman Ürünleri San. Tic. Ltd. Şti. (Seba) operates the ÇOSB Seba integrated sawmill and wood pellet plant located in Çanakkale province (Northwest) of Turkey. The feedstock for the production of wood pellets is sourced from several primary wood processors, including a sawmill of related organization (Dere Orman Ürünleri Tic. Ltd. Şti.) which is located right next to the BP and the feedstock is sourced via pneumatic pipeline. The feedstock includes material from a Supply Base consisting of defined area within the province of Çanakkale.

The supply base area is Çanakkale Regional Directories of Forestry, which includes Çanakkale, Biga, Çan, Yenice, Kalkım, Bayramiç, Ayvacık District Forestry Operation Directorates. The supply base area contains 538 782 hectares of forestland.

Forests can be categorized into three groups in terms of their forms of management. These groups include high forests, coppice forests and high coppice forests. While about 433.329 hectares of forests in the Supply Base Area are productive high forests (more than 80 percent of the overall forested lands), the remaining 106.453 hectares are degraded forests.



As part of the forestry management plans, inventory works are conducted that cover the issues of forest resource potential, health, tree species and productivity etc. The data obtained from these works are numerically assessed and management plans are organized according to assessment results.

In terms of their size and the changes they go under and according to the forest inventory assessment results obtained so far, the size of general forested lands was revealed to be 20.2 million hectares (26.1 percent), between 1963 and 1972, and 22.6 million hectares (28.7 percent) in 2018, which is the latest inventory year. According to these inventory results, the forest lands have increased by 2.4 million hectares over the last 40 years, which correspond to 3,06 percent of the country's overall territory.

See the detailed description of the Supply Base in the Supply Base Report (Exhibit 2)

## 5.3 Detailed description of Supply Base

Total Supply Base area (ha): 539 78 ha

Tenure by type (ha): 100% public ownership (General Directorate of Forestry – Çanakkale Regional Directorate of Forestry)

Forest by type (ha): 539.78 thousand ha temperate forests according to FSC classification

Forest by management type (ha): 539.78 thousand ha managed, managed natural forests

Certified forest by scheme (ha): FSC forest management scheme – 539.78 thousand ha

Quantitative description of the Supply Base can be found in the Biomass Producer's Public Summary Report, published in the organization's website: <http://www.sebabioenergy.com>

## 5.4 Chain of Custody system

The Organisation holds a FSC Chain of Custody (CoC) certificate TT-COC-006548 and the SBP chain of custody is based on the FSC CoC system. The Biomass Producer's FSC Chain of Custody system is based on the Transfer system, and all inputs to the production shall be FSC certified (FSC 100%, FSC Mix Credit).

The organisation is producing wood pellets from secondary feedstock - residues of primary wood processing . For production of biomass it is also planned to use primary feedstock – logging residues. The BP does not use mass balance system for accounting of feedstock with 100% FSC claim since all feedstock shall be sourced with FSC 100% claim only. Non-certified feedstock shall be segregated and processed separately in non-certified product. At the time of on-site audit the organisation is not yet sourcing FSC certified input and is expecting the supplier - the regional forest management company (General Directorate of Forestry – Çanakkale Regional Directorate of Forestry) to obtain the FSC Forest Management certificate, which is in the process of finalizing.

After the reception of feedstock via trucks, incoming loads of feedstock are weighted and moisture determined, feedstock unloaded into feedstock storage site and is registered into the recordkeeping system. In case of sawdust received via pneumatic pipeline, it is continuous process and the feedstock is delivered directly to the inlet (feeder).

## 6 Evaluation process

### 6.1 Timing of evaluation activities

The main assessment auditing process was conducted in accordance with the audit agenda described below, which had been provided to the BP prior to the audit. No other suppliers had been visited since the BP is primarily sourcing the feedstock from a sawmill next to the BP which is related company and it was visited at the time of on-site audit. The BP had not been sourcing FSC certified feedstock from other suppliers.

In total 2 days were spent for the assessment audit: 1.5 days onsite and 0.5 day for the document review.

Audit plan for the main part of the third surveillance evaluation is placed below.

Activities/ timing	Place	Auditors	Date
09.00 - 09.30 Opening meeting	Office	GK	29.10.2019
09.30- 12.30, lunch break 12.30-13.30 SBP Management system review, discussion of the changes taking part in a system Review of the documents and evidences related to implementation of the SBP standards 2,4. Office staff interview Documents and procedures review, including review of: Management System for SBP (FSC); Supply Base Report Analysis of FSC Chain of Custody (CoC) system critical control points	Office		
13.30- 15.00 Site tour: Interview with feedstock reception department, responsible persons for moisture measurement (interview with operator), responsible persons for energy production and sourcing, responsible for production (interview with production manager), and shipping. Inspection of installations, comparison with „SAR“ technical data Verified processes and involved departments 1) Procurements and reception (office manager/ logistic specialist, tractor drivers) 2) Moisture measurements (operators/ laboratory); 3) Production and production records/ (accountancy/ production staff 4) Energy related recordkeeper (Energy/ mechanics/ Mechatronics); 5) Sales and client communication (sales department)	Production site	GK	29.10.2019

<p>15.00 - 17.30</p> <p>Review of the documents and evidences related to implementation of the SBP standard 5 and instruction document 5E. Office staff interview</p> <p>Review of „SAR“ and GHG calculations, evaluation of compliance to SBP Framework Standard 5: Collection and Communication of Data, Instruction Document 5E.</p> <p>Review of documentation and records, assumptions for calculation of energy consumption and related GHG emissions data:</p> <ol style="list-style-type: none"> <li>1. Engineering specifications, interviews to responsible technical staff,</li> <li>2. available records of and invoices for: Electricity, diesel, natural gas, propane</li> <li>3. Samples of transport documents / invoices (finished products)</li> </ol>	Office	GK	29.10.2019
<p>9.00- 12.00</p> <p>Continued review of SAR report and GHG calculations, including review of documentation</p> <p>Review and verification of data included in the Energy and GHG data report, including review of applicable documentation and records: production records, feedstock procurement data, data on fuel and energy use (records of and invoices for electrical energy consumption, fossil fuel use records, biomass fuel use records etc.)</p> <p>Review of Static Biomass profiling data sheet and validation of included information</p>	Office	GK	30.10.2019
<p>12.00- 13.00</p> <p>Lunch break</p>	Office	GK	
<p>13.00-14.00</p> <p>Finalizing the office audit, clarification of missing issues and information, preparing for the closing meeting</p>	Office	GK	
<p>14.00 Closing meeting</p>	Office	GK	
<p>14.30 - 16.00</p> <p>Visiting Çanakkale port (logistics site)</p> <p>Site visit to port facilities, observing the biomass storage site(s) and biomass trans-shipment processes</p>	Çanakkale port (logistics site)	GK	

## 6.2 Description of evaluation activities

The audit began with an opening meeting on Tuesday October 29 at 9:00 - 9:30 with attendance of the overall responsible person for SBP system, operational and administration staff with all daily responsibilities for the BP's CoC and SBP procedures. During the opening meeting auditor introduced himself, presented the audit aims and objectives, clarified assessment audit methodology and clarified the scope of the audit, as well as rehearsed the audit agenda and discussed the related practicalities.

After the opening meeting auditor went through all applicable requirements of the SBP standards nr.2, 4, 5 and instruction document 5E covering input clarification, existing chain of custody and controlled wood system, management system, CoC, recordkeeping/mass balance requirements, emission and energy data and categorisation of input and verification of SBP compliant feedstock/ biomass. During the process, overall responsible person for SBP system and over responsible staff as well as other staff having responsibilities within the system were interviewed.

The audit included review of documents check of calculations in regard to the GHG emission data reported by the BP. All SBP related documentation, including SBP Procedures, GHG data calculations/ data sheet, Supply Base Reports, Biomass profiling data, Batch specific data, and FSC system description was provided by the organization in advance as well as were reviewed during the desk verification conducted prior to the audit. Overall changes had been discussed.

The audit also included a site tour, with review of production facilities and equipment which was not in operation but in the process of commissioning, review of feedstock reception process, feedstock storage and final product storage. Interviews were conducted with all staff relevant to the critical control points and key responsibilities in relation to the reception, production, storage and sales of the certified products. Attention was focused on practical implementation aspects of the SBP system, review of documents and system, evaluation of input material classification (reception and registration), analysis of the critical control points in existing CoC system and FSC system critical control points as well as correctness and availability of GHG data. During the first day of the audit, roundtrip around BP's pellet production was undertaken. During the round trip production technology and information about the main production facilities was presented to the auditor.

The audit was concluded in the afternoon of Wednesday October 30 with a closing meeting with attendance the overall responsible person for SBP and operational/administrative staff. At the end of the audit, audit findings were summarised, and audit conclusion based on use of 3 angle evaluation method were provided to the overall responsible person and other responsible operational/administrative staff that have participated in the meeting. During the closing meeting the auditor also presented information on identified non-conformances and a few points for follow-up.

After the closing meeting a visit to Canakkale port facility was paid. During the visit the pellet reception, storage and pellet trans-shipment processes were evaluated and observed, including machinery and storage site.

Auditor team composition:

Auditor(s), roles	Qualifications
<p>Ģirts Karss Lead auditor (Standards #2, #4 and #5)</p>	<p>Works for NEPCon since 2011 Ģirts Karss holds MSc in Environmental Science from the Lund University and the University of Latvia. FSC Forest Management and Chain of Custody lead auditor, conducting FSC Chain of Custody audits in wood industry companies and FSC forest management audits in Baltic countries, Russia, Belarus and Ukraine. In 2016 acquired the SBP auditor qualification. 3-year experience in capacity of auditor and lead auditor in SBP assessments (with Supply Base Evaluation in scope), annual audits and scope change audits (with Supply Base Evaluation in scope) in Latvia.</p>

### 6.3 Process for consultation with stakeholders

The Certification Body has conducted a stakeholder consultation by means of sending a stakeholder notification email to stakeholder organizations one month prior to the assessment audit date on October 29 2019. The notification encourages all stakeholders to forward any comments regarding harvesting practices, environmental performance and any other direct or indirect effect on stakeholders to organization and NEPCon.

## 7 Results

### 7.1 Main strengths and weaknesses

Strengths: small number of the management staff and clearly designated responsibilities within the staff members. Experienced and qualified staff. Mainly FSC certified feedstock is planned to be sourced for production of SBP-compliant biomass. Commitment and reliance on measurement-based data acquisition and reporting. In overall the main strength of the BP is in relatively simple scope and reliance mainly on FSC certified secondary feedstock input.

Weaknesses: few minor non-conformities (NCRs) were identified during the assessment process. See the NCRs in Section 10 of this report. The GHG data have been compiled, but are not complete, as refers to relatively short time frame of plant operation since commissioning and is based partly on empirical data and data from engineering specifications.

### 7.2 Rigour of Supply Base Evaluation

Not applicable. Supply Base Evaluation process is not applied.

### 7.3 Collection and Communication of Data

The organization has compiled emission data in the SBP Energy and GHG report (SAR) as a part of preparation process for the SBP assessment. The data had been provided prior to the assessment audit and verified and validated at the time of audit. The data are not complete, refers to relatively short time frame of plant operation, and includes records from the recordkeeping system and engineering specifications. The BP has developed and are implementing a system to collect and record data on Energy use and associated Greenhouse Gas emissions. The BP has provided detailed overview of the systems and databases to collect and record Greenhouse Gas data during the assessment audit. All related evidence with regard to GHG calculation and assumptions were provided to the auditor.

The BP uses mainly secondary feedstock, holds documentation for energy and fuel use in the production of biomass, and a simple transport scheme with endpoints at the BP pellet mill in Çanakkale, and at the Çanakkale port. The accuracy and completeness of GHG data has been evaluated during the on-site audit. The accuracy and completeness of GHG data can be evaluated as average due to the fact that plant has been operating in testing mode during the reporting period and thus reliable, stable biomass processing related data are not available.

### 7.4 Competency of involved personnel

During the audit responsibilities and competencies of staff members involved in the SBP system management and maintenance, were evaluated.

The General Director has been appointed the overall responsible for the SBP and FSC CoC system. The plant manager was found to have detailed knowledge of all aspects of the feedstock sourcing, pellet production and final product characteristics and logistics. He is supported by administrative staff – quality manager, process engineers, who handles all daily responsibilities for the SBP and FSC systems. The BP responsible staff demonstrated a good understanding of both the overall objectives and specific requirements of the SBP system and standards.

## 7.5 Stakeholder feedback

Certification body did not receive any comments or complaints from stakeholders during the stakeholder consultation process prior to the main assessment.

## 7.6 Preconditions

There are no open preconditions to the certification.

## 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. The organisation does not apply Supply Base Evaluation.



## 9 Review of Company's mitigation measures

Not applicable. The organisation does not apply Supply Base Evaluation.

## 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.

### 10.1 Open non-conformities

<b>NC number</b> 01/19 (42091)	<b>NC Grading:</b> Minor
<b>Standard &amp; Requirement:</b>	SBP Standard #2, p. 6.3 1.4 The BP shall ensure that the place of harvesting is within the defined SB. (6.3):  Note: 'Place of harvesting' in the standard means the place of growth of the feedstock, i.e. the location of the tree stump
<b>Description of Non-conformance and Related Evidence:</b>	
<p>The BP sources SBP-compliant secondary feedstock from one principal supplier, a related company, see also findings in p. 1.3. The BP have access to information on supplies of primary material and can ensure that the place of harvesting for the secondary feedstock is within the defined Supply Base since it has access to the Dera roundwood procurement records. As to other suppliers, the BP has purchased secondary feedstock from other external suppliers; however, there are no provisions envisaged, a system established in documented procedures of the organization on how to ensure that the place of harvesting for SBP-compliant secondary feedstock is within the defined Supply Base. According to information from responsible person, the BP would source secondary feedstock from suppliers within range of 50-100km and BP's related company would supply primary feedstock to many of sawmills. Thus, the BP would possess information on feedstock origin for a quite a share of suppliers of secondary feedstock.</p> <p>An NCR 01/19 raised, graded as minor non-conformance due to low risk of feedstock being sourced from other regions than Çanakkale.</p>	
<b>Timeline for Conformance:</b>	By the next surveillance audit, but no later than 12 months from report finalisation date
<b>Evidence Provided by Company to close NC:</b>	Pending

<b>Findings for Evaluation of Evidence:</b>	Pending
<b>NC Status:</b>	Open

<b>NC number 02/19 (42092)</b>	<b>NC Grading: Minor</b>
<b>Standard &amp; Requirement:</b>	SBP Standard #5, Instruction document 5E, p. 6.8.1 The BP shall record the electricity consumed during the Reporting Period, stated as kWh per tonne of biomass output. (5E, 6.8.1)
<b>Description of Non-conformance and Related Evidence:</b>	
<p>The pellet production plant and the sawmill share one electrical energy meter. Estimation of electrical energy consumption made based on few measurements when the sawmill was not operating, but on-going pellet production.</p> <p>Invoice from supplier of electrical energy covers production of both sawmill and pellet production facilities (reporting period 01.06.2019 - 30.09.2019). There is no specific information on electrical energy consumption for pellet plant as there is no dedicated meter installed for pellet production facility.</p> <p>For purpose of SBP requirements the BP has estimated the electrical energy consumption by measurement. Data on electrical energy consumption had been recorded several times from the electrical energy meter and the average of electrical energy consumption was calculated while full scale production of pellet including drying, pelletizing and conveying all the way to the storage were on-going, but the sawmill operation was stopped. In this way the BP had obtained an estimate of electrical energy consumption for pellet production. Obtained data show the specific energy consumption (80 kWh/mt pellets) is below typical range of electrical energy use for pellet production. This can be attributed to both the way the data has been obtained and the operation regime of the plant in the first months after plant commissioning.</p> <p>A minor NCR 02/19 raised due to lack of reliable recorded data on electrical energy consumption for pellet production.</p>	
<b>Timeline for Conformance:</b>	By the next surveillance audit, but no later than 12 months from report finalisation date
<b>Evidence Provided by Company to close NC:</b>	Pending
<b>Findings for Evaluation of Evidence:</b>	Pending
<b>NC Status:</b>	Open

## 10.2 Observations

<b>OBS 01/19 ()</b>	<b>Standard &amp; Requirement:</b>	SBP Standard #2, p. 15.3 15.3 The BP management system shall document all necessary procedures
<b>Description of findings leading to observation:</b>	It was confirmed during the assessment audit that documented procedures and documents related to the requirements of SBP standards have been elaborated. Most relevant SBP and Chain of Custody related processes are covered in the documented procedures: SBP documented procedure. Review of documented procedures show that procedures are referring to outdated SBP standard instruction documents: Instruction Documents 5A, 5B, 5C, 5D and does not have reference to SBP standard Instruction document 5E, which had replaced mentioned standard Instruction Documents. An observation OBS 01/19 raised.	
<b>Observation:</b>	The BP management system should document all necessary procedures according to actual SBP standards	

## 11 Certification decision

**Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:**

<b>Certification decision:</b>	Certification approved
<b>Certification decision by (name of the person):</b>	Olesja Puiso
<b>Date of decision:</b>	11/Dec/2019
<b>Other comments:</b>	<i>Click or tap here to enter text.</i>