

# NEPCon Evaluation of UAB Graanul Invest Compliance with the SBP Framework: Public Summary Report

First Surveillance 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*

*Version 1.0: published 26 March 2015*

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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:	29/Jan/2020
Report authors: :	Gerimantas Gaigalas
Name of the Company:	UAB "Graanul Invest"
Company contact for SBP:	Mihkel Jugaste, Head of Quality and Certification Systems
Certified Supply Base:	sourcing from Lithuania, Poland, Estonia, Belarus and Russia
SBP Certificate Code:	SBP-07-19
Date of certificate issue:	07/Mar/2019
Date of certificate expiry:	06/Mar/2024

This report relates to the First Surveillance Audit

## 2 Scope of the evaluation and SBP certificate

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

Organization holds valid FSC COC certificate NC-COC-009116, covering FSC credit system. It is multi-site FSC certificate managed by central office in Estonia. Wood pellets might be produced from round wood, sawdust, chips or wood shavings. Other types of feedstock: chips from forest residues and sawmill residues, are used in the drier. Inputs that are used for pellet production and inputs for the drier go through the same control system upon receipt. Company is sourcing feedstock from logging companies and from secondary and tertiary producers.

All inputs for SBP-Compliant biomass production are FSC and FSC controlled.

All incoming wood materials are weighted by weighbridge or measured by log receiver in case of logs, and measurement data is recorded. Wood pellets are sold through Riga port in Latvia.

Scope description:

Production of wood pellets in Alytus, Lithuania, for use in energy production and transport to Riga port. 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 and profiling data collection analysis;
- Instruction Document 5E: Collection and Communication of Energy and Carbon data.

## 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

Graanul Invest group is a privately-owned company, established in 2003, which operates in the fields of forestry, development of bioenergy and production of renewable energy. The company owns 11 wood pellet plants, UAB Graanul Invest plant being one of the smallest and oldest ones.

The plant uses mainly secondary and tertiary feedstock (sawdust, chips, shaving and off-cuts) which originates from Lithuania, Poland, Belarus, Russia and Estonia. Primary feedstock is not widely used and only accounts for 17,7% in the feedstock basket. Primary feedstock is sourced from Lithuania and Poland is SBP-Controlled. The company produces industrial and domestic pallets. The sales points are through Riga port (under CIF) to ports in Hull (UK), Tyne (UK), Immingham (UK), Avedore (DK), Studstrup (DK), Dordrecht (NL), Rotterdam (NL), Eemshaven (NL), to Riga port (under FOB) and at pellet plant gate. Production capacity 100 000 metric tons.

### 5.2 Description of Company's Supply Base

#### Lithuania

According to 2017 forest statistics, the total forest land area was 2,189,600 ha, covering 33.5% of the country's territory. Since the 1st January 2003, the forest land area has increased by 144,300 ha corresponding to 2.2% of the total forest cover. During the same period, forest stands expanded by 107,400 ha to 2,058,400 ha. Occupying 1,145,100 ha, coniferous stands prevail in Lithuania, covering 55.6% of the forest area. They are followed by softwood deciduous forests (841,100 ha, 40.9%). Hardwood deciduous forests occupy 72,200 ha (3.5%). The total area of softwood deciduous forest land increased by 142,700 ha over the last fourteen years. The area of hardwood deciduous has decreased by 20,400 ha (mainly due to dieback of ash stands) and coniferous forest by 14,900 ha. *Scots pine occupies the biggest share in Lithuanian forests – 713,200 ha.* Compared to 2003, the area of pine expanded by 1,700 ha. Norway spruce stands covers 429,500 ha, with a reduction of 15,800 ha. Birch stands covers the largest area among deciduous trees. Since 2003, it increased by 64,400 ha and reached 456,600 ha by the 1st January 2017. Area of black alder increased by 36,600 ha, to 156,100 ha. The area of grey alder decreased by 400 ha reaching 121,600 ha. The area of aspen stands expanded by 36,500 to 93,800 ha. The area of oak stands increased from 35,700 ha to 46,300 ha. The area of ash stands diminished by half to 18,200 ha. The average forest area per capita increased to 0.77 ha. Since 2003 total growing stock volume increased from 453.4 million m<sup>3</sup> up to 542.7 million m<sup>3</sup>. The average growing stock volume in all forests since 2003 increased by 30 m<sup>3</sup>/ha up to 256 m<sup>3</sup>/ha.

In the beginning of 2017, the distribution of forests by functional groups was as follows. Group I (strict nature reserves): 24,900 ha (1.1%); group II (ecosystem protection and recreational): 260,800 ha (11.9%); group III (protective): 320,300 ha (14.6%); and group IV (commercial): 1,583,500 ha (72.3%). Changes of forest land area distribution by forest groups area based on the decisions of forest management schemes.

By 1st January 2017, around a half of all forest land in Lithuania was of State importance – 1088,600 ha. 848,800 ha of private forests were registered in the State Enterprise Centre of Registers. After intersection of layers of all forests and private holdings the estimated area of private forests was 882,900 ha. The number of private forest owners amounted to almost 250,100, a forest estate averaging 3.4 ha.

Various forest protection measures were applied by the state forest enterprises on 27,200 ha of forest land in 2016. Biological treatment was applied on 300 ha. Foresters from 2,600 ha removed 106,000 m<sup>3</sup> of trees damaged by wind and snow. Chemical protection measures were used on area 2,700 ha. For sanitary protection, state forest enterprises set up 11,700 new nesting-boxes.

The potential future annual cut is calculated at 5.2 million m<sup>3</sup>, of which 2.4 million m<sup>3</sup> is made up of sawn timber and the remaining 2.8 million m<sup>3</sup> of small dimension wood for pulp or board production, or for fuel. The figures refer to the nearest 10-year period. Thereafter a successive increase should be possible if more intensive and efficient forest management systems are introduced.

Certification of all state forests in Lithuania is done according to the strictest certification in the world – the FSC (Forest Stewardship Council) certificate. The audit of this certificate testifies to the fact that Lithuanian state forests are managed especially well – following the principles of the requirements set to protection of and an increase in biological diversity.

“Lithuanian Statistical Yearbook of Forestry 2017” found here <https://osp.stat.gov.lt/services-portlet/pub-edition-file?id=32300>

<http://www.fao.org/docrep/w3722E/w3722e22.htm>

### Poland

Poland's forests cover 9.2 million hectares, 30.6 percent of the country's territory making it one of the countries with the largest forest area in Europe. 81 percent of forest land belongs to public institutions and 19 percent to private owners. 77 percent of total forest land is administrated by the State Forests National Forest Holding. The rest of the State forests are national parks (2 percent). Other publicly owned land constitutes 2 percent of total forest area.

69 percent of all trees in Polish forests are coniferous trees, and they dominate stock volume for the wood industry. Coniferous stands are dominated by pine and larch (58.5 % of total forest stands). Other coniferous species in Polish forests include spruce (6.3 %), and fir (3.1 %). Broadleaved trees occupy 31 percent of total forest land. The predominant deciduous forest species in Poland are: oak (7.5% of total forest stands), birch (7.4%), beech (5.8%), alder (5.5%), hornbeam (1.5%), aspen (0.7%) and poplar (0.1%). Stands aged from 40 to 80 years dominate Poland's forests, and the average age of forest stands is 60 years. According to the State Forests, stands aged 41–80 years, representing age classes III and IV, prevail in the forest age structure and cover 26 percent and 19.0 percent of the forest area respectively. Stands aged 41–60 years, class III, prevail in most ownership categories, while in private forests they occupy 35.5 percent of the area. Stands older than 100 years, account for 12.3 percent of the forest area managed by the State Forests. Private forests account for only 2.8 percent. Non-forested land in privately-owned forests accounts for 6.8 percent of their total area, and in the State Forests for 3.2 percent.

According to the country forest inventory, published by Poland's Statistical Office, growing stock of woods stands amounts to 2,491 million m<sup>3</sup> of barked timber, of which in forests managed by the State Forests accounts for 79% of total timber, and in private forests for 16.4%. Resources, i.e. the average growing stock of standing wood calculated per 1 ha of forest area, amounts to 271 m<sup>3</sup>, of which in forests managed by the State Forests is 277 m<sup>3</sup>, and in private forests is 234 m<sup>3</sup>.

Soft sawn wood production accounts for 90 percent of total sawn wood production in Poland. In 2014 sawn softwood production amounted to 4.2 million m<sup>3</sup>. The majority of sawn hardwood was destined for the domestic market and only 18 percent of production was exported. According to Poland's statistics published in the United Nations Economic Commission for Europe (UNECE) report, imports of sawn hardwood by Poland accounted for 50 percent of its domestic production and amounted to 0.25 million m<sup>3</sup> (compared to 0.22 million m<sup>3</sup> in 2013).

Poland is a big producer of wood-based panels in the EU. In 2014 9.2 million m<sup>3</sup> of this product was produced in Poland. Among high value-added wood products furniture is of special importance. According to Poland's Ministry of Environment, the value of furniture production (including furniture elements) amounted to PLN 32.3 billion (U.S. \$ 10.2 billion). The wooden packaging (mainly pallets) sector had high development dynamics during the last few years. The value of production amounted to PLN 1.9 billion (U.S. \$ 0.6 billion).

In 2015 FSC certificates were held by 16 out of 17 State Forests Regional Directorates and 2 Forest Experimental Stations. According to the Ministry of Environment, FSC certification covers 6.9 million hectares of forests, or 75 percent of total forested area. In 2015 almost 3,000 FSC- CoC certificates were registered in Poland. Approximately 17 percent of certified companies (313) are certified also in other systems, such as FSC-CW (FSC Controlled Wood). Additionally, 136 companies, or 7 percent, held FSC-RA (FSC Controlled Wood Risk Assessment) certificates, confirming implementation of a risk assessment system for wood supplies. Approximately 70 percent certificates were issued for production companies. These were mainly certifying for the producers of sawn wood, wooden garden products, builder's carpentry and joinery, furniture and its elements, wooden accessories, wood-based panels, wood pulp, and paper and secondary paper products.

<https://gain.fas.usda.gov/Recent%20GAIN%20Publications/The%20Forestry%20and%20Wood%20Products%20in%20Poland%20Warsaw%20Poland%203-23-2017.pdf>

### Estonia

Estonia is a member of the European Union since 2004. The Estonian legislation is in compliance with the EU's legislative framework and directives. National legislative acts make references to the international framework. All legislation is drawn up within a democratic system, subject to free comment by all stakeholders<sup>1</sup>. The Estonian legislation provides strict outlines in respect to the usage of forestry land and the Estonian Forestry Development Plan 2020<sup>2</sup> has clear objectives and strategies in place to ensure the

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<sup>1</sup> [http://europa.eu/about-eu/countries/member-countries/estonia/index\\_en.htm](http://europa.eu/about-eu/countries/member-countries/estonia/index_en.htm)

<sup>2</sup> Original title: „Eesti metsanduse arengukava aastani 2020“; approved by Estonians parliament decision nr 909 OE 15. February 2011.a  
[http://www.envir.ee/sites/default/files/elfinder/article\\_files/mak2020vastuvoetud.pdf](http://www.envir.ee/sites/default/files/elfinder/article_files/mak2020vastuvoetud.pdf)

forestland is protected up to the standards of sustainable forest management techniques. The Ministry of the Environment coordinates the fulfilment of state duties in forestry. The implementation of environmental policies and its supervision are carried out by two separate entities operating under its governance. The Estonian Environmental Board monitors all of the work carried out in Estonia's forests whereas the Environmental Inspectorate exercises supervision in all areas of environmental protection.

The forest is defined in the Forest Act. There are three main forest categories described in this legislation: commercial forests, protection forests and protected forests. According to the ownership, forests are also divided into private forests, municipality forests and state-owned forests. The state-owned forest represents approximately 40% of the total forest area<sup>3</sup> and are certified according to FSC and PEFC forest management and chain of custody standards in which the indicators related to forest management planning, maps and availability of forest inventory records are being constantly evaluated and addressed<sup>4</sup>. The state forest is managed by State Forest Management Centre (RMK) which is a profit-making state agency founded on the basis of the Forest Act and its main duty lies in a sustainable and efficient management of state forest.

Currently more than 2 230 000 ha, equal to 51% of the Estonian land territory, is covered by forest as indicated in Figure 1 and the share of forest land is growing. According to FAO data, during 2000 - 2005, average annual change in the forest cover was +0.4 %<sup>5</sup>. Forestry Development Plan 2012-2020 and Yearbook Forest 2014, that gives annual reports and facts about the forest in Estonia, state that during last decade the cutting rate in Estonian forests is from 7 to 11 mill m<sup>3</sup> per year<sup>6</sup>. The amount is in line with sustainable development principle when the cutting rate doesn't exceed the annual increment and gives the potential to meet the long-term economic, social and environmental needs. According to the Forestry Development Plan 2012-2020 the sustainable cutting rate is 12-15 mil ha per year.

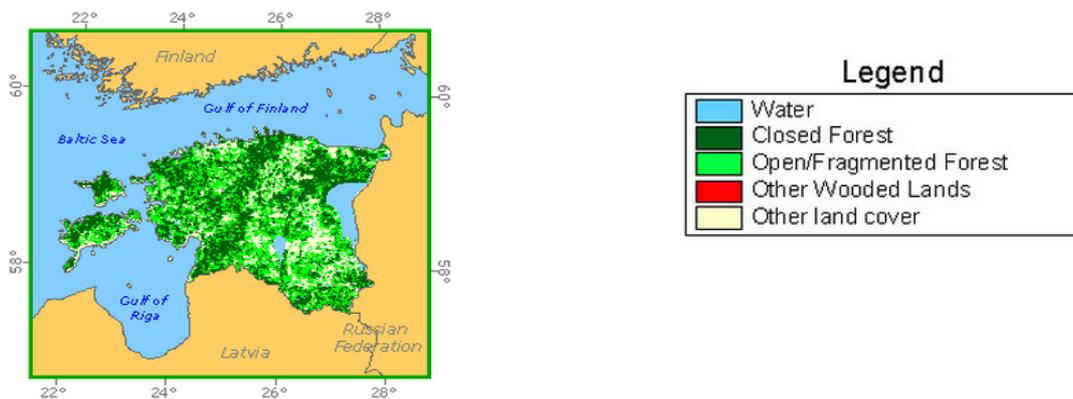


Figure 1. Forest cover of Estonia (FAO: <http://www.fao.org/forestry/country/en/est/>).

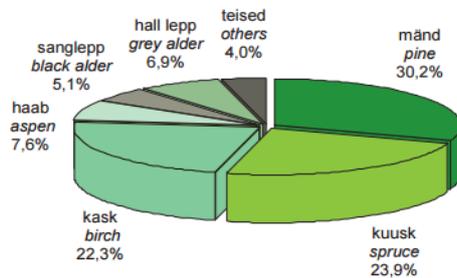
<sup>3</sup> <http://www.rmk.ee/organisation/operating-areas>

<sup>4</sup> <http://www.rmk.ee/organisation/environmental-policy-of-rmk/certificates>

<sup>5</sup> <http://www.fao.org/forestry/country/32185/en/est/>

<sup>6</sup> Yearbook Forest 2014 (all key figures, graphs and tables are bilingual)

Figure 2. The distribution of growing stock by tree species (Yearbook Forest 2014).



For logging in any type of forest, it is required that a valid forest inventory or forest management plan, along with a felling permit issued by the Environmental Board, is available. All issued felling permits and forest inventory data is available in the public forest registry online database<sup>7</sup>.

Area of protected forests accounts for 25.3% of the total forest area whereas 10% is considered to be under strict protection. The majority of protected forests are located on state property. The main regulation governing the preservation of biodiversity and the sustainable use of natural resources is the Nature Conservation Act<sup>8</sup>. Estonia has signed the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in 1992<sup>9</sup> and joined the International Union for Conservation of Nature (IUCN) in 2007<sup>10</sup>. There are no CITES or IUCN protected tree species naturally growing in Estonia.

According to the Forestry Yearbook 2014 the wood, paper and furniture industry (646,4 million euro) contributed 23.7% to the total sector providing 3.8% of the total value added. Forestry accounted for 1.5% of the value added.

In Estonia, it is permitted to access natural and cultural landscapes on foot, by bicycle, skis, boat or on horseback. Unmarked and unrestricted private property may be accessed any time to pick berries, mushrooms, medicinal plants, fallen or dried branches, unless the owner forbids it. On unmarked and unrestricted private property camping is allowed for 24 hours. RMK creates exercising and recreational opportunities in nature and in recreational and protection zones and also provides education about nature.

## Russia

Twenty two percent of all forest land mass and 25 % of the world's wood reserves belong to Russia. Forests take up 69% of all land and the area occupied with forests amounts to 1,183.3 million ha. 1,144 million ha of which 97% is under federal ownership.

Most Russian forests are boreal. Predominant forest tree species are the larch, pine, spruce, Siberian pine, oak, beech, birch, and aspen. According to the 2010 forest account, the total growing stock of the forest estate is 80 billion m<sup>3</sup>. The country average growing stock of mature and overmatured stands (without shrubs) is 132

<sup>7</sup> <http://register.metsad.ee/avalik/>

<sup>8</sup> <https://www.riigiteataja.ee/en/eli/517062015004/consolide>

<sup>9</sup> <http://www.envir.ee/et/cites>

<sup>10</sup> <http://www.envir.ee/et/iucn>

m<sup>3</sup> /ha. The mean annual increment in volume is rather low in Russia: it is no more than 1.23 m<sup>3</sup> per hectare of forested land.

The annual allowable cut for 2010 was 634 million m<sup>3</sup>, including 61 million m<sup>3</sup> for protection forests and 573 million m<sup>3</sup> for production forests. The greatest allowable cut is set for coniferous forests (128 million m<sup>3</sup>). The actual cut is below 28% of the allowable cut.

In 45 Russian regions, the shares of timber and paper outputs range from 10% to 50% in their total industrial outputs. Forest enterprises and organisations employ over one million people

<http://www.profor.info/sites/profor.info/files/Background-ForestGovernance-Russia-English.pdf>

### Belarus

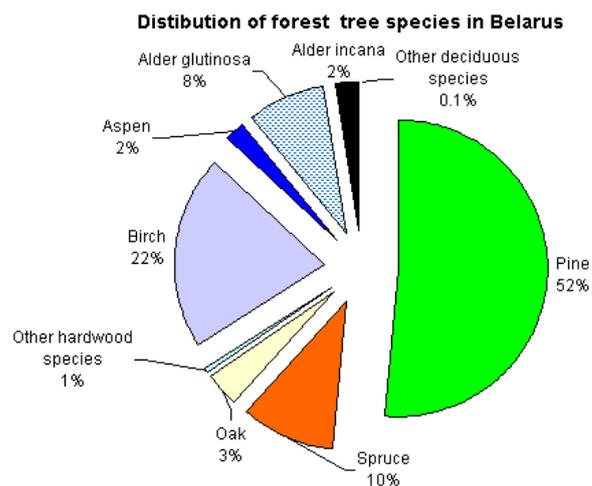
Forest is one of the few exploitable natural resources in Belarus. As a branch of economy, the forestry in Belarus is highly perspective.

In general forestry is a part of the Belarusian Forestry and Forest industry consists of forestry, forest industry, wood processing and wood-pulp and paper industries etc. It includes nearly 5 thousand enterprises and production facilities with different forms of property (including over 470 large and medium-scale enterprises) with over 146 thousand employees.

Forestry resources are one of the main natural riches of Belarus. The total stock of timber constitutes 1.3 billion cubic meters\* The forestry fund occupies about 9.2 million hectares. The forest lands is about 8.3 million hectares. One third of the territory of Belarus is covered by forests.

Forests in Belarus are owned by the State and mostly belonged to the Committee of Forestry (about 7 mill. ha or 76.1% of the total area of the forestry fund). The rest part of forest owners is represented by the Committee of Defence, collective farms and associations, the research institutes and Administration.

A specific feature of the raw resources of timber in Belarus is domination of industrial valuable tree species (pine, spruce, birch, see figure below).



<http://www.fao.org/docrep/ARTICLE/WFC/XII/0784-B1.HTM>

## 5.3 Detailed description of Supply Base

The plant uses mainly secondary and tertiary feedstock (sawdust, chips, shaving and off-cuts) which originates from Lithuania, Poland, Belarus, Russia and Estonia. Primary feedstock is not widely used and only accounts for 17,7% in the feedstock basket. Primary feedstock is sourced from Lithuania and Poland is SBP-Controlled.

This report will account for total feedstock volumes but will not include SBE (controlled material). Certified e.g. SBP-Compliant material accounts for 40,04% of all production feedstock.

The plant has around 45 stable suppliers.

Total Supply Base area (ha): Lithuania 2,18 mill., Poland 9,2 mill., Belarus 9,2 mill., Russia 885 mill., Estonia 2,23 mill. Total: 907,81 mill. ha.

Tenure by type (ha): 903,87 ha mill. state forests; 3,94 mill. private forests.

Forest by type (ha): boreal 907,81 mill.

Forest by management type (ha): 907,81 mill. managed semi-natural

Certified forest by scheme (ha): FSC 65,121 mln (Lithuania 1,140; Poland 6,937; Belarus 8,846 mln; Russia 46,706 mln, Estonia 1,492 mln) PEFC 31,07 mln (Lithuania 0; Poland 7,160; Belarus 8,552 mln; Russia 14,117 mln, Estonia 1,241 mln) Number of suppliers: 45

Controlled Feedstock 59,96%

SBP-compliant Primary Feedstock 2,18%

SBP-compliant Secondary Feedstock 32,93%

SBP-compliant Tertiary Feedstock 4,93%

SBP non-compliant Feedstock 0%

Species: Picea abies; Pinus sylvestris; Alnus glutinosa; Alnus incana; Populus tremula; Betula pendula; Betula pubescens; Fraxinus excelsior; Tilia cordata; Salix spp.

## 5.4 Chain of Custody system

UAB Graanul Invest is under multisite FSC CoC certificate managed by Graanul Invest AS (NC-COC-009116). FSC certificate also covers controlled wood verification program for Lithuania. The company is using FSC credit system. Company has enforced procedures and system update that they will buy only FSC certified material from 01.12.2016. Their product groups for the FSC CoC certification include wood pellets only.

## 6 Evaluation process

### 6.1 Timing of evaluation activities

Activity	Location	Date/time
Opening meeting	Office	<b>17/12/2019</b> 9.30-09.45
Documents and procedures review Inputs and outputs review	Office	09.45-11.30
Energy use calculations review	Production facilities	11:30 – 13:00
Lunch break		13:00-14:00
Chain of custody review (site tour), interview with responsible persons	Office	14:00-15:30
Staff interviews	Production site and office	15:30-16:30
Closing meeting	Office	16:30 – 17:00

### 6.2 Description of evaluation activities

Auditor(s), roles	Qualifications
Gerimantas Gaigalas  Lead auditor Evaluation against all applicable requirements	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.

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:

December 17, 2019.

Auditor was welcomed in UAB Graanul Invest office in Alytus. Auditor started with an opening meeting attended by Mihkel Jugaste, Head of Quality and Certification Systems and Mindaugas Puodžiūnas, head of supply and logistics. 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.

After a roundtrip around BP's pellet production was undertaken. During the site tour applicable records were reviewed, production staff was interviewed. At the end of the day the preliminary results were presented.

## 6.3 Process for consultation with stakeholders

Not applicable

## 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.

Weaknesses: even the responsible persons in UAB Graanul Invest Alytus has undertaken the training in English and have relevant material in English, the main procedures are written in Estonian, which is not spoken or understood by Lithuanian staff.

### 7.2 Rigour of Supply Base Evaluation

Not applicable

### 7.3 Collection and Communication of Data

BP has a system to gather and record Greenhouse Gas emissions. 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 Head of Quality and Certification Systems. SBR was reviewed by central office's top management: CEO, COO, Head of Quality and Certification Systems, Biomass Purchasing Manager and the Head of Forestry.

Overall responsible person has all required competences, education and work experience from timber and industry sector, but these requirements are not described in procedures.

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

### 7.5 Stakeholder feedback

No comments or concerns were received during the audited period.

### 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.*

*No NCR issued*

## 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>	29/Jan/2020
<b>Other comments:</b>	N/A