

# SCS Global Services Evaluation of Great Northern Timber, Inc. 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*

*Version 1.1: published 30 January 2018*

*Version 1.2: published 4 April 2018*

*Version 1.3: published 10 May 2018*

*Version 1.4: published 16 August 2018*

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# 1 Overview

CB Name and contact:	SCS Global Services, 2000 Powell St. Ste 600 Emeryville, CA 94608
Primary contact for SBP:	Sarah Harris, SHarris@scsglobalservices.com
Current report completion date:	22/Nov/2019
Report authors:	Kyle Meister
Name of the Company:	Great Northern Timber, Inc.
Company contact for SBP:	Breck Stuart, 201 1883 Upper Water Street, Halifax, Nova Scotia 83J 1S9
Certified Supply Base:	New Brunswick, Nova Scotia, and Prince Edward Island, Canada
SBP Certificate Code:	SBP-04-34
Date of certificate issue:	04/Dec/2018
Date of certificate expiry:	03/Dec/2023

This report relates to the First Surveillance Audit

## 2 Scope of the evaluation and SBP certificate

This certificate covers the production and trade of wood pellets for use in energy production at the organization's pellet mill in Musquodoboit, Nova Scotia and transportation to Port of Halifax, Nova Scotia, Canada. It also covers a Supply Base Evaluation for the sourcing of feedstock from the following Canadian Provinces/Territories: Nova Scotia, New Brunswick, and Prince Edward Island.

### 3 Specific objective

The specific objective of this evaluation was to confirm that the Biomass Producer's management system can ensure that all requirements of specified SBP Standards are implemented across the entire scope of certification.

The following critical control points were identified and evaluated:

Processes for procurement and processing, transport and storage:

Primary feedstock: standing timber or log sorts directly from a harvest site may be purchased through the BP or one of its affiliated companies. A contract and supplier declaration are used to secure harvest rights and ensure compliance to SBP requirements. Trip tickets with unique identifiers are used during transport from the harvest site to pellet mill. Upon delivery to the pellet mill, a scale ticket is issued, and material is dropped off in designated sorting areas. This critical control point has been evaluated via document review of SBE, related procedures, interviews with procurement staff and suppliers and field visits.

Secondary and tertiary feedstock: contracts and supplier declarations for sawdust, shaving, offcuts, and other mill residues are used to secure ownership transfer and ensure compliance to SBP requirements. Trip tickets with unique identifiers are used during transport from the supplier to the pellet mill. Upon delivery to the pellet mill, a scale ticket is issued, and material is dropped off in designated sorting areas. This critical control point has been evaluated via document review of SBE, related procedures, interviews with procurement staff and suppliers.

Storage: When material is pulled for production, it is weighed to track how much is used for production and how much remains in stock. Primary feedstock is chipped. Whole-log chipping without debarking is now used in most cases.

Volume accounting method: material is measured in bone-dry metric tonnes. When it is pulled for production, it is weighed.

Documentation of transactions: load summaries, trip tickets (BOLs), scale tickets, and invoices.

Energy data collection and reporting: feedstock transport, production, delivery to port, and, where applicable, loading onto buyer's vessel.

## 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 – there is no SBP-endorsed RRA.

## 5 Description of Company, Supply Base and Forest Management

### 5.1 Description of Company

Great Northern Timber Resources (GNTR) produces industrial wood pellets for export to European power and utilities under its company Great Northern Timber, Inc (GNTI). The Musquodoboit, Nova Scotia pellet mill was first built in 1998. Over the past two decades it has utilized mill residues and low-grade roundwood material that could not be used in other financially viable ways in the province. The pellet mill employs 25 local workers in a community of less than 500 residents.

The pellet mill sources secondary and tertiary woody feedstock from industries in New Brunswick and Nova Scotia. Such feedstock may also originate from a pulp mill in Nova Scotia that can also source from Prince Edward Island in addition to the two other provinces mentioned.

### 5.2 Description of Company's Supply Base

#### **Nova Scotia**

Nova Scotia is dominated by trees. Over 75% of the province's 5.5 million hectares (ha) are dominated by treed vegetation. These 4.2 million ha of forested lands also include areas that are returning to a young forested state after harvesting. There is no sign of permanent forest conversion by agriculture, urbanization or other development<sup>1</sup>. Situated on the south-eastern coast of Canada, Nova Scotia's forests contain 35% hardwood species and 65% softwood species. Part of the Acadian Forest Region, common species include spruce, balsam fir, white pine, maple and birch. Fifty-three (53%) percent of the forest land in Nova Scotia is privately owned and forty-seven (47%) is owned by the provincial or federal government<sup>2</sup>.

#### **New Brunswick**

New Brunswick is located on the east coast and is the largest of the three Maritime Provinces. The Acadian Forest covers most of the province. In New Brunswick, forests cover more than 6 million ha of the province's 7 million ha of land. That represents 83% of the province's total area<sup>3</sup>. Of this, 2% is under the jurisdiction of various federal government departments (Parks Canada, Department of National Defense, etc). The provincial government is responsible for 48%, which is typically referred to as Crown Lands. The remaining

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<sup>1</sup> Source : [https://novascotia.ca/natr/forestry/reports/State\\_of\\_the\\_Forest\\_2016.pdf](https://novascotia.ca/natr/forestry/reports/State_of_the_Forest_2016.pdf)

<sup>2</sup> Source :

[https://www.sfmcanada.org/images/Publications/EN/Nova\\_Scotia\\_info\\_Provinces\\_and\\_territories\\_EN.pdf](https://www.sfmcanada.org/images/Publications/EN/Nova_Scotia_info_Provinces_and_territories_EN.pdf)

<sup>3</sup> Source : [https://www2.gnb.ca/content/dam/gnb/Departments/nr-rn/pdf/en/ForestsCrownLands/GNBForestryBrochure\\_EN.pdf](https://www2.gnb.ca/content/dam/gnb/Departments/nr-rn/pdf/en/ForestsCrownLands/GNBForestryBrochure_EN.pdf)



50% is privately owned. Of the half of the province that is in private hands, 20% is owned by industry firms (Industrial Freehold) and the remaining 30% is owned by non-industrial private owners<sup>4</sup>.

### **Prince Edward Island**

Located on the east coast of Canada in the Gulf of St Lawrence, Prince Edward Island (PEI) is Canada's smallest province, with a total area of 568,600 ha. PEI has 250,084 ha of forest land, of which 33,011 ha (13.2%) is public lands and 217,073 ha (86.8%) is private<sup>5</sup>.

PEI's forest belongs to the Acadian Forest region of Canada. The most common coniferous species is black spruce, white spruce, balsam fir and eastern larch with a lesser amount of white pine. The primary deciduous species are red maple, trembling aspen and white birch with sugar maple, red oak, beech, white ash and yellow birch accounting for the remainder.

## **5.3 Detailed description of Supply Base**

A quantitative description of the supply base and summary statistics can be found in the GNTI's Supply Base Report.

## **5.4 Chain of Custody system**

The company sources certified material from FSC-certified sources under its valid COC certificate. In addition, material sourced from non-certified sources has been evaluated under the company's SBE and Due Diligence System (DDS). All material is subject to the company's COC procedures for sourcing certified and non-certified material. The company's wood procurement policy states that it will communicate information about its certifications to its employees, customers, and other interested parties.

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<sup>4</sup> Source : <https://www2.gnb.ca/content/dam/gnb/Departments/nr-rn/pdf/en/ForestsCrownLands/2011SnapshotOfNB-NonIndustrialForestOwners.pdf>

<sup>5</sup> Source : [https://www.sfmcanada.org/images/Publications/EN/PEI\\_info\\_Provinces\\_and\\_territories\\_EN.pdf](https://www.sfmcanada.org/images/Publications/EN/PEI_info_Provinces_and_territories_EN.pdf)

## 6 Evaluation process

### 6.1 Timing of evaluation activities

Pre-assessment activities, consisting primarily of stakeholder consultation and interviews with secondary/tertiary suppliers, were conducted from October 2019 until just prior to the onsite audit from 19-21 November 2019.

<b>Site Name or Location:</b>	Upper Musquodoboit Pellet Mill (document and record review for ST 2, and 4. Walkthrough of mill and port. End day at port.	
<b>Date and Time of Audit:</b>	19 November 2019/ 9:00am	
<b>Audit Activity</b>	<b>Items to Review / Actions</b>	<b>Approx. Time</b>
Opening meeting	Introductions, auditor review of audit scope, audit plan and intro/update to SBP, FSC, and SCS standards and protocols, client description of organization	15-20 min.
Review of previous nonconformities	Review of evidence of corrective actions taken by organization since previous audit (records, documents, pictures, etc.): <b>Minor CAR 2018.9; OBS 2019.10, OBS 2019.11, and OBS 2019.13 (if not closed during GHG desk audit).</b>	30-60 min.
Review of CoC/SBP procedures, products and material accounting	Written procedures, work instructions, feedstock description (see ID 5B section 4), product group list, accounting system (transfer, percentage or credit; physical separation, percentage method)	20-30 min. <i>for any updates</i>
Review of material balances and records	Auditor-selected sample of the following: material tracking system, summary of purchases and sales, invoices, shipping documents, training records, outsourcing agreements, other applicable SBP/CoC systems, procedures and records, tracebacks from certified outputs to eligible inputs	60-90 min.
Verification of calculations	Auditor-selected sample and verification of calculations for conversion factors, percentage claims, and credit accounts, as applicable	
Evaluation of trademarks	Review of auditor-selected sample of SBP/FSC/PEFC and/or SCS on-product and/or promotional trademark uses; review of any on-site trademark uses such as banners, posters, entryway signs	15 min. <i>if applicable</i>
Walkthrough of facilities: mill and ports	Review of physical inputs and outputs, material receipt, processing, storage, credit account (if applicable), sale, and overall control; GHG measurement points	Late AM and rest of PM workday
Staff interviews	Interviews with appropriate number and diversity of staff to assess knowledge of CoC procedures related to their position	

  

<b>Site Name or Location:</b>	FMU-level site visits and secondary/tertiary supplier interviews; review of ST 1, 2 and 4 documentation	
<b>Date and Time of Audit:</b>	20 November 2019/ 8:00am or TBD	
<b>Audit Activity</b>	<b>Items to Review / Actions</b>	<b>Approx. Time</b>
FMU-level site visits (3 FMUs)	Verification of ST 1, 2, and 4 field requirements	AM

Review of documentation	Verification of ST 1, 2, 4, and 5 requirements	PM
<b>Site Name or Location:</b>	FME office in Halifax	
<b>Date and Time of Audit:</b>	21 November 2019/ 9:00am	
<b>Audit Activity</b>	<b>Items to Review / Actions</b>	<b>Approx. Time</b>
Document review	Any remaining document reviews.	1-4 hrs.
Staff interviews	Interviews with appropriate number and diversity of staff to assess knowledge of procedures related to their position	
Closing meeting preparation	Auditor takes time to consolidate notes and review audit findings for presentation at closing meeting	20-45 min.
Closing meeting and review of findings	Convene with all relevant staff to summarize audit findings, review identified nonconformities, and discuss next steps	30 min.
End		

## 6.2 Description of evaluation activities

Onsite activities included review of the SBR, SBE, sourcing and COC procedures, risk assessments, DDS, and a sample of secondary and tertiary supplier documentation (e.g., contracts, transport records, wood supplier audit records, etc.). Audit methods included interviews with staff, suppliers, and stakeholders; review of documentation; and observation of operations, including critical control points. An accounting issue was identified at a critical control point related to storage at the Port of Halifax.

One stakeholder provided SCS Global Services with comments prior to the onsite audit, which was addressed in the 2019 [public summary report](#) for the BP’s related company, Northern Fibre Terminal. The onsite audit consisted of a review of purchase, due-diligence, and wood supplier audit records for secondary and tertiary feedstock suppliers; onsite visits to a sample of primary feedstock suppliers and review of their associated wood supplier audit records, contract, scale tickets, and related purchasing and due-diligence documentation; onsite visits to the pellet mill, main office, and port facilities to verify chain of custody procedures and greenhouse gas measurements through observation, record review, and verification of calculation methods. A closing meeting was held to present findings.

## 6.3 Process for consultation with stakeholders

One stakeholder provided comments in relation to Northern Fibre Terminal and Great Northern Timber, Inc. as part of Northern Fibre Terminal’s Main SBP Evaluation. No other stakeholders provided comments prior to or during the onsite audit.

## 7 Results

### 7.1 Main strengths and weaknesses

The BP's COC control system, including its DDS, ensure that feedstock material is coming from low risk sources. Sourcing procedures are clear and with enough detail that staff can implement them with minimal training. Staff and contractors who prepared the SBR and SBE have an excellent understanding of provincial forestry regulations. GHG calculations for the various transportation routes are accurate. Refer to the findings section for main weaknesses.

### 7.2 Rigour of Supply Base Evaluation

The SBE depends highly on provincial legal frameworks, most of which are complete enough to ensure compliance. The BP implements control measures to ensure compliance to legal requirements, such as contracts, supplier declarations, and internal and supplier audits. Other elements of the SBE depends on risk analyses and publications on common forest practices and trends of the region.

### 7.3 Collection and Communication of Data

The BP maintains records of feedstock supply, power and fuel usage, moisture content, and transport distances and vehicles, which have been compiled into a series of Excel files for monitoring and GHG calculations. The results have been reported in the SAR. Some corrections will have to be made per the audit findings.

### 7.4 Competency of involved personnel

The BP used a staff person and a contractor to prepare the SBE. The staff person has a background in forestry and forest engineering, as well as work experience in the forest products and oil & gas sectors. The contractor is an experienced forester with a background in certification and ISO auditing. Thus, the team is well-qualified to conduct the SBE and GHG calculations.

### 7.5 Stakeholder feedback

One stakeholder provided SCS Global Services with comments prior to the onsite audit, which was addressed in the 2019 [public summary report](#) for the BP's related company, Northern Fibre Terminal. Onsite inspection of harvest sites during this audit did not lead to any changes to the audit team's conclusions. Clearcutting occurred on a 50.6-acre woodlot harvested in 2018 that was visited in the 2019 audit; the other two sites consisted of overstory removal to release advanced regeneration and thinnings. In addition, these two sites also had retention areas of Eastern hemlock, Eastern white pine, and Northern hardwood species in no-harvest and/or equipment exclusion zones. The woodlot where clearcutting occurred was surrounded by forestland on three sides, one side of which appears to have been harvested in the past five years. In addition to retention of individual scattered trees within the harvest unit, there were three 1/18-1/4-acre clumps retained for wildlife

purposes. Sensitive sites (e.g., seeps) were also designated as equipment-exclusion zones. Given that the objectives of the landowner were to maximise short-term revenue and regenerate the stand while benefiting wildlife, the harvest prescription is appropriate. A cut-to-length system was used to harvest the area, which ensure broad distribution of harvest residues over the site.

## 7.6 Preconditions

No preconditions were raised.

## 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.*

The auditor reviewed the SBE and SBR for completeness. Documentation for a sample of the three supplier types was reviewed to assess conclusions made in the SBE. Onsite visits to a sample of FMUs were also conducted to verify harvest practices, biomass retention, species diversity, and health & safety. There were no divergences between the BP’s and the auditor’s risk conclusions.

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

Indicator	Risk rating (Low or Specified)		Indicator	Risk rating (Low or Specified)	
	Producer	CB		Producer	CB
1.1.1	Low	Low	2.3.3	Low	Low
1.1.2	Low	Low	2.4.1	Low	Low
1.1.3	Low	Low	2.4.2	Low	Low
1.2.1	Low	Low	2.4.3	Low	Low
1.3.1	Low	Low	2.5.1	Low	Low
1.4.1	Low	Low	2.5.2	Low	Low
1.5.1	Low	Low	2.6.1	Low	Low
1.6.1	Low	Low	2.7.1	Low	Low
2.1.1	Low	Low	2.7.2	Low	Low
2.1.2	Low	Low	2.7.3	Low	Low
2.1.3	Low	Low	2.7.4	Low	Low
2.2.1	Low	Low	2.7.5	Low	Low
2.2.2	Low	Low	2.8.1	Low	Low
2.2.3	Low	Low	2.9.1	Low	Low
2.2.4	Low	Low	2.9.2	Low	Low
2.2.5	Low	Low	2.10.1	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

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

Indicator	Risk rating (Low or Specified)	
	Producer	CB
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	CB
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

No mitigation measures are necessary as low risk has been determined for all categories.



## 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.

<b>NC number</b> 2019.1	<b>NC Grading:</b> <i>Observation</i>
<b>Standard &amp; Requirement:</b>	ST 1, 2.2.1-2.2.8 and 2.8.1
<b>Description of Non-conformance and Related Evidence:</b>	
<p>The BP works with three logging contractors in Nova Scotia, each of whom also harvests on Crown Land. This means that each undergoes a health &amp; safety and environmental audit by Crown Foresters at least once per year during years when the contractor is active on Crown Land. Topics covered include safety and BMP compliance, among others. Additional references in the SBE of the health &amp; safety and environmental audit process would strengthen the evidence of conformance.</p> <p>Evidence: Appendix VI: Forest Operations Safety &amp; Environmental Audit Form for Nova Scotia for the three logging contractors that BP contracts in the province.</p>	
<b>Timeline for Conformance:</b>	<i>Response is optional</i>
<b>Evidence Provided by Company to close NC:</b>	<i>Click or tap here to enter description provided by Company to close the NC.</i>
<b>Findings for Evaluation of Evidence:</b>	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
<b>NC Status:</b>	<i>Choose status.</i>

<b>NC number</b> 2019.2	<b>NC Grading:</b> <i>Observation</i>
<b>Standard &amp; Requirement:</b>	ST 1, 2.2.5 and 2.4.2
<b>Description of Non-conformance and Related Evidence:</b>	
<p>The BP describes provincial laws &amp; regulations in the findings section related to conformance to indicators 2.2.5 and 2.4.2, but does not cite its list of laws &amp; regulations in the MOV/Evidence. It appears that this may have been removed during combining the GNTI and NFT SBEs since it is present in last year's SBE,</p>	

which is still available publicly. A review of all indicators that rely on the list of laws & regulations should be conducted to ensure consistency.	
<b>Timeline for Conformance:</b>	<i>Response is optional</i>
<b>Evidence Provided by Company to close NC:</b>	<i>Click or tap here to enter description provided by Company to close the NC.</i>
<b>Findings for Evaluation of Evidence:</b>	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
<b>NC Status:</b>	<i>Choose status.</i>

<b>NC number</b> 2019.3	<b>NC Grading:</b> <i>Observation</i>
<b>Standard &amp; Requirement:</b>	<i>ST 1, 2.5.1</i>
<b>Description of Non-conformance and Related Evidence:</b>	
<p>There are consultation processes in place on Crown Lands and, in many cases, on certified industrial freehold lands. The BP relies on FSC Canada Control Measure 1 (“Indigenous Peoples with legal and/or customary rights within the Forest Management Unit do not oppose* the Forest Management Plan. Guidance: *oppose = opposition demonstrated through active litigation, blockade, protest or other significant conflict of substantial magnitude.”). For non-certified industrial freehold and private woodlots visited during the audit, review of wood supplier audit checklists, stakeholder consultation, and field observation did not reveal any opposition to forest management. Reliance upon these sources of information alone, however, may not reveal any litigation or other opposition that could be formally registered in the legal system or media.</p>	
<b>Timeline for Conformance:</b>	<i>Response is optional</i>
<b>Evidence Provided by Company to close NC:</b>	<i>Click or tap here to enter description provided by Company to close the NC.</i>
<b>Findings for Evaluation of Evidence:</b>	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
<b>NC Status:</b>	<i>Choose status.</i>

<b>NC number</b> 2019.4	<b>NC Grading:</b> <i>Observation.</i>
<b>Standard &amp; Requirement:</b>	<i>ST 4, 5.2.2 and 5.2.5</i>
<b>Description of Non-conformance and Related Evidence:</b>	
<p>One supplier did not supply Bills of Lading (BOLs) for one week of feedstock delivered to the pellet mill; however, BOL number were referenced on the scale tickets and were available for other weeks evaluated.</p>	

<p>This indicates that this issue is not systematic and that traceability can still be ensured for that week, but would require consultation with the supplier if an enquiry were necessary.</p> <p>Contrary to the supplier’s claim in interviews, it does not have SFI certification in COC or Fibre-sourcing. The supplier could not be found on the SFI database.</p> <p>Evidence: Delco: scale tickets (sawdust): 8517, 8518, 8543, 8588, and 8603 (BOLs referenced within scale tickets, but copies not provided to BP). Checked BOLs and Scale tickets for another week, and BOLs were available: 65117/8636, 65131/8656, 65155/8668, 65167/8677, and 65186/8690.</p>	
<b>Timeline for Conformance:</b>	<i>Response is optional</i>
<b>Evidence Provided by Company to close NC:</b>	<i>Click or tap here to enter description provided by Company to close the NC.</i>
<b>Findings for Evaluation of Evidence:</b>	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
<b>NC Status:</b>	<i>Choose status.</i>

<b>NC number 2019.5</b>	<b>NC Grading:</b> <i>Observation</i>
<b>Standard &amp; Requirement:</b>	<i>ST 5, ID5E, 3.2.5, 3.2.6, and 3.2.7</i>
<b>Description of Non-conformance and Related Evidence:</b>	
<p>GTS-157352265003796536285-TR was sold October 31, 2019, which would fall under the reporting period for the 2020 SAR as the typical reporting period is September 1-August 31 for the BP. However, it could not have registered this sale without an SDI. So, the SDI was made using the SDIs for the 2019 reporting period and the volume sold reported in the 2019 SAR.</p> <p>This is a new requirement. The certification body and/or SBP should be consulted to see if any changes are necessary.</p> <p>Evidence: GTS-157352265003796536285-TR (DTS file) and SAR.</p>	
<b>Timeline for Conformance:</b>	<i>Response is optional</i>
<b>Evidence Provided by Company to close NC:</b>	<i>Click or tap here to enter description provided by Company to close the NC.</i>
<b>Findings for Evaluation of Evidence:</b>	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
<b>NC Status:</b>	<i>Choose status.</i>

## 11 Certification decision

<b>Based on the auditor’s recommendation and the Certification Body’s quality review, the following certification decision is taken:</b>	
<b>Certification decision:</b>	Certification approved
<b>Certification decision by (name of the person):</b>	Theodore Brauer
<b>Date of decision:</b>	29/Jan/2020
<b>Other comments:</b>	<i>Click or tap here to enter text.</i>