

Control Union  
Certifications B.V.  
Evaluation of Rainbow  
Pellet Sdn Bhd.  
Compliance with the SBP  
Framework: Public  
Summary Report

Main (Initial) Audit

[www.sbp-cert.org](http://www.sbp-cert.org)



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

*For further information on the SBP Framework and to view the full set of documentation see  
[www.sbp-cert.org](http://www.sbp-cert.org)*

### *Document history*

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# 1 Overview

CB Name and contact:	Control Union Certifications Meeuwenlaan 4--6;; P.O.Box 161, 8000ADZwolle, Netherlands. certification@controlunion.com
Primary contact for SBP:	Andrea Ferrazzo - aferrazzo@controlunion.com
Current report completion date:	16/Mar/2020
Report authors:	Mr. Supun Nigamuni (Lead Auditor)
Name of the Company:	Rainbow Pellet Sdn Bhd. L8-22 Brem Mall, Jalan Kepong, 51200, Kuala Lumpur, Malaysia
Company contact for SBP:	Mr. David Wong, L8-22 Brem Mall, Jalan Kepong, 51200, Kuala Lumpur, Malaysia. Tel: +603-62511101, Mob: +60122132638, E-mail:piokl@pio.com.my
Certified Supply Base:	The supply base, as defined by Rainbow Pellet, covers the state forests within peninsular Malaysia.
SBP Certificate Code:	SBP-06-40
Date of certificate issue:	16/Mar/2020
Date of certificate expiry:	15/Mar/2025

This report relates to the Main (Initial) Audit

## 2 Scope of the evaluation and SBP certificate

The certificate scope covers biomass producer producing wood pellets Lot 22, Kawasan Perindustrian Kechai Tui, Daerah Lipis, Pahang, Malaysia using 100% PEFC certified and PEFC Controlled Sources wood residues (saw dust, wood shavings, wood slabs) as per SBP standards 2,4,5, ID5D and pellet transportation by trucks to storage at West Port, Klang

A Supply Base Evaluation is not included in the scope of the evaluation. The scope includes communication of Dynamic Batch Sustainability Data

### 3 Specific objective

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

The scope of the evaluation covered:

- Review of the BP's management procedures;
- Review of the production processes, production site visit;
- Review of PEFC system control points and an analysis of the existing PEFC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients; and
- GHG data collection analysis.
- SAR and profiling data collection analysis
- Compliance assessment against Instruction Document 5D: Dynamic Batch

Sustainability Data v1.1 evaluation

## 4 SBP Standards utilised

### 4.1 SBP Standards utilised

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

- SBP Framework Standard 1: Feedstock Compliance Standard (Version 1.0, 26 March 2015)
- SBP Framework Standard 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

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

### 5.1 Description of Company

Rainbow Pellet Sdn Bhd (1205730-D) founded in 2016, is currently one of the largest wood pellet producers in Malaysia, with a design capacity of 200,000 MT a year. BP is tax exempted for a period of 10 years as the company has invested under "East Coast Economic Region" (ECER) in 2016.

Company is head quartered in : L8-22 Brem Mall, Jalan Kepong, 51200, Kuala Lumpur, Malaysia which also serves as the administration unit. Biomass production unit is located at Lot 22, Kawasan Perindustrian Kechai Tui, Daerah Lipis, Pahang, Malaysia. For Storage of pellets before final loading a storage facility is occupied at the West Port, Klang on a temporary basis.

Rainbow Pellet manufactures wood pellets from secondary feedstock, including saw dust, wood shavings, wood slabs. All feedstock to be SBP claimed are purchased through PEFC certified COC operations with 100% PEFC certified and PEFC Controlled Sources claims in the transaction documents.

The biomass producer conducts parallel production of certified and non certified material (materials received from primary and secondary processors without PEFC claims) with traceability assured through Physical separation across the manufacturing process.

### 5.2 Description of Company's Supply Base

All feedstock origins from Peninsular Malaysia specifically from the state forests certified for PEFC endorsed MTCS namely Negeri Sembilan, Pahang, Perak, Terengganu. Feedstock of wood residues (saw dust, wood shavings, wood slabs) are received from certified PEFC COC operations with a 100% PEFC certified or PEFC Controlled Sources claims where the material can be traced back to the declared supply base through removal passes to the respective state forestry's.

No suppliers supplying with PEFC Controlled Sources yet. But the company wishes to keep that as an option as a result the procedures are developed accordingly and there is a possibility of expanding the supply base to other non MTCS certified areas within Peninsular Malaysia. In all cases company will only buy with valid PEFC Controlled Sources claims.



### 5.3 Detailed description of Supply Base

As per government statistics of 2018, forested area in Peninsular Malaysia was 5.76 million hectares or 43.6% of the total land area of 13.21 million hectares. Out of this total, 4.80 million hectares have been gazetted as Permanent Reserved Forests (PRFs) under the National Forestry Act 1984. These PRFs are managed under the Sustainable Forest Management practices for economic, social and environmental benefits. By function 1.83 million ha is managed under Protection forest while 2.98 million ha is managed as Production forest.

Production	Million Cubic Metres
Logs	4.19
Sawn Timber	2.71
Plywood	0.44
Veneer	0.14
Moulding	0.08

Source: <https://www.forestry.gov.my/en/2016-06-07-02-53-46/2016-06-07-03-12-29>

Currently all feedstock origins from Peninsular Malaysia specifically from the state forests certified for PEFC endorsed MTCS namely Negeri Sembilan, Pahang, Perak, Terengganu. Selangor State Forestry is also certified for MTCS, however no commercial felling as Selangor Government has imposed a moratorium prohibiting logging until 2035. Certified forest management area from respective state forestry units are as follows which the company has identified as part of supply base,

FMU	Size (ha)	Short Description
PAHANG STATE FORESTRY DEPARTMENT	1,504,407.35	<p>The Pahang FMU is managed by the Pahang State Forestry Department (PSFD). The PSFD is committed in the management of the FMU on a sustainable basis. The administration of the FMU is divided into 8 forest districts namely the Bentong, Raub, Cameron Highland, Jerantut, Kuantan/Pekan/Maran, Lipis, Rompin and Temerloh/Bera Forest Districts. The inland forest is managed under the Selective Management System (SMS) on a 30 -year rotation period.</p> <p>Under the Eleventh Malaysia Plan 2016- 2020, the Annual Allowable Cut (AAC) for the Pahang FMU had been set at 68,435 ha or 13,687 ha per year. Current Forest Management Plan (FMP) covers the period from 2016 to 2025.</p> <p>The FMU is located between 2° 27' 21.34" N to 4° 27' 21.34" N and 101°21' 54.54" E to 103° 37' 29.21" E.</p>
PERAK STATE FORESTRY DEPARTMENT	988,603.94	<p>The Perak FMU is managed by the Perak State Forestry Department (PSFD). The PSFD is committed in the management of the FMU on a sustainable basis. The administration of the FMU is divided into five (5) forest districts namely the South Perak, Kinta/Manjung, Kuala Kangsar, Larut/Matang and Hulu Perak Forest Districts. The inland forest is managed under a Selective Management System (SMS) on a 30-year rotation period. Under the Eleventh Malaysia Plan (2016-2020), the Annual Allowable Cut (AAC) for the Perak FMU had been set at 7,744 ha. Current Forest Management Plan (FMP) covers the period from 2016 to 2025.</p> <p>The FMU is located between 3° 40'30" N to 5° 53'30" N and 100°12'30"E to 101°54'00"E</p>

TERENGGANU STATE FORESTRY DEPARTMENT	540,308.80	<p>The Terengganu Forest Management Unit (FMU) consists of 544,883.00 ha of permanent reserved forest (PRF) and is managed by the Terengganu State Forestry Department (TSFD). The PRFs within the FMU comprise mainly of inland Dipterocarp forests covering an area of 514,082.73 ha with the remaining PRFs covering 25,931.10 ha of peat swamp forests and 1,036.55 ha of mangrove forests. There was also a forest plantation in the certified area covering of 3,833 ha. The administration of the FMU is divided into three forest districts namely the North, West and South Terengganu Forest Districts. The inland forest is managed under a Selective Management System (SMS) on a 25 to 30-year rotation period. Under the Eleventh Malaysia Plan (2016-2020), the Annual Allowable Cut (AAC) for the Terengganu State FMU had been set at 6,388 ha. Current Forest Management Plan (FMP) covers the period from 2016 to 2025. There were no indigenous people reserves in the FMU. They live outside of Terengganu FMU PRF (settled in state land).</p> <p>Terengganu FMU located in Terengganu State with the administration divided into three forest districts namely the North, West and South Terengganu Forest Districts</p>
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## 5.4 Chain of Custody system

Rainbow Pellet Sdn Bhd holds valid PEFC COC certification (CU-PEFC-865581 valid till 20-08-2024) for the production of wood pellets.

All wood fibre is tracked through the process from the district of origin through the mill to the final bill of sale.

The production under SBP claims are limited to

- Feedstock received with an SBP-approved Chain of Custody (CoC) System claim (100% PEFC Certified)
- Feedstock received with an SBP-approved Controlled Feedstock System claim (PEFC Controlled Sources)

Company conducts parallel production of certified and non certified material (materials received from primary and secondary processors without PEFC claims) with traceability assured through Physical separation across the manufacturing process. Separate storage areas are assigned for PEFC certified feedstock and the certified SBP wood pellets are produced batchwise where the entire production line is producing certified material at a time to limit the possibility of any contamination.

A database is used to gather and control information related to the feedstock such as supplier name, weigh bridge tickets, incoming delivery documents, type of feedstock, certification and associated claim, and removal passes related to the incoming material providing traceability to the origin. Rainbow Pellet has appropriate control mechanisms to calculate output volumes and claims. and trademark/logo approval. Additionally,

Rainbow Pellet conducts an annual management review of the commitments, programs and procedures to evaluate the overall effectiveness of the SBP management system. The SBP claim is to be stated on the sales invoices and recorded in the DTS. Dummy invoices were available during the audit process to demonstrate competence with the use.

## 6 Evaluation process

### 6.1 Timing of evaluation activities

Summary of the main-assessment

Lead auditor	Supun Nigamuni
Team member(s)	Koen Jongste (Senior Auditor), Paramjit Singh Karam Singh (Trainee Auditor)
Location(s) visited	Administration: L8-22 Brem Mall, Jalan Kepong, 51200, Kuala Lumpur, Malaysia  Production: Lot 22, Kawasan Perindustrian Kechai Tui, Daerah Lipis, Pahang, Malaysia
Audit date(s)	16-17 Dec 2019
Audit duration	2 days

Note: Finished goods storage at West Port (Temporary) was planned to be visited initially. However considering that there is no current stock and the location is to be occupied on a temporary basis on shipment dates and availability it was concluded that there no need to visit the storage premises specifically. However the warehouse complex was audited by the same audit team on the 19<sup>th</sup> Dec 2019 relation to SBP Main Evaluation for sister company WWW Rainbow Sdn Bhd.

Audit Agenda is as follows,

Activity	Site	Date/Time
Opening meeting	Administration Site	16-12-19 09:00-09:30
Scope Assessment	Administration Site	09:30-10:00
Documentation review <ul style="list-style-type: none"> <li>- Business Integrity</li> <li>- Company procedures and records related to Chain of Custody</li> <li>- Social, Health and Safety Requirements</li> <li>- Complaints and grievance handling procedures</li> </ul>	Administration Site	10:00 – 17:00

<ul style="list-style-type: none"> <li>- Internal audits, Management review</li> <li>- Logo and Trademark Use</li> <li>- GHG data registration and calculations</li> </ul>		
<p>Field verifications and documentation review at production site</p> <ul style="list-style-type: none"> <li>- Material receipt</li> <li>- Production</li> <li>- Material control and handling</li> <li>- Sales and delivery</li> <li>- Training</li> <li>- Health and Safety</li> </ul>	Production Site	<p>17-12-19</p> <p>09:00 – 15:00</p>
Preparation for closing meeting	Production Site	15:00 – 16:00
Closing meeting	Production Site	16:00 – 17:00

## 6.2 Description of evaluation activities

The audit consisted of an opening meeting, during which the scope was confirmed. The auditor also explained the methods to be employed during the audit. After this introduction, all relevant requirements of the applicable SBP standard(s) were verified on compliance through the use of a report template and checklists. The audit was completed by filling in the audit report and discussing the audit results. Critical Control points were evaluated and found to be sufficiently managed. During the closing meeting it was also discussed how evidence can be submitted of corrective action with respect to non-conformities that were identified during the audit.

## 6.3 Process for consultation with stakeholders

As the certification scope excludes a Supply Base Evaluation Rainbow Pellet was not needed to conduct any prior stakeholder consultation. According to the obligations as the CB CUC conducted a public stakeholder consultation using a national stakeholder list and also the stakeholder list declared by the client prior to the evaluation. Stakeholder consultation was open for a period of 30 days starting from 15-11-19. No comments received from the public stakeholder consultation.

## 7 Results

### 7.1 Main strengths and weaknesses

Rainbow Pellets demonstrated a good level of compliance with the required criteria of Standard 2, 4 and 5. There was reasonable evidence provided to support compliance where a Non-Conformity was not detected. The Non-Conformities presented in this report identify actions that must be taken in order to comply with the SBP system and its standards. The existence of a PEFC Chain of Custody system in combination with company system for Green Gold Label (GGL) are considered a main strength with respect to Rainbow Pellet overall conformity with the relevant SBP standards. Weaknesses observed with the Non conformities identified in this audit

### 7.2 Rigour of Supply Base Evaluation

An SBE was not considered required as all feedstock used for SBP certified pellet production is currently 100% PEFC Certified for SBP-Compliant claims and PEFC Controlled Sources for SBP-Controlled claims.

### 7.3 Collection and Communication of Data

The organization has employed an external consultant who helped the organization with implementation of the system for collection of the emission and energy data. The company supplied the audit team actual data on Greenhouse Gas emissions, except for forest operations as all feedstock is secondary.

### 7.4 Competency of involved personnel

Not applicable as no SBE in the scope

### 7.5 Stakeholder feedback

See 6.3 above. No comments received from the public stakeholder consultation.

### 7.6 Preconditions

All identified major Non Conformities shall be settled prior to the certification can be awarded.

## 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 as no SBE in the scope**



## 9 Review of Company's mitigation measures

Not applicable as no SBE in the scope

## 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> 2019-01	<b>NC Grading:</b> Major
<b>Standard &amp; Requirement:</b>	Std 4 - 6.1.1 All inputs downstream of the biomass production process where mixing of SBP-compliant biomass with non-SBP compliant biomass takes place, shall have been determined to be EUTR compliant and shall have been subjected to 'due diligence'.
<b>Description of Non-conformance and Related Evidence:</b>	
Information is available in the SOPs. As the company is getting feedstock for SBP certification as SBP complaint and SBP controlled, as per EUTR requirement the company is only required to have "information". The information on species is available in the removal passes. However the list of species presented in the SBR is not consistent with the removal passes.	
<b>Timeline for Conformance:</b>	Prior to (re)certification
<b>Evidence Provided by Company to close NC:</b>	Company has concluded the following as the root cause for the NCs; Even though procedure was consistent with the requirement it was determined that the lack of implementation was as a result of lack of understanding of the requirement. As a result, SBR has featured all commercial species available in Malaysia without relating to its specific supply base of MTCS certified FMUs (state forestry of Pahang, Perak, Terengganu). As corrective and preventive actions company has taken the following actions; - SBR list of species updated to be consistent with the purchased in 2019 - Purchasing department conducting verification of supply base with PEFC website and available public summary reports and removal passes to ensure certified sources.- Training conducted for the purchasing department on supplier material claims verification.- Maintain Training records on supply base training.

<b>Findings for Evaluation of Evidence:</b>	Corrective and preventive actions submitted by the client on 27-02-20 includes training conducted on 30-01-20 for all critical staff in order to ensure all receipts are cross checked with the species as reflected in the removal pass from the MTCS certified FMU and the same data to be updated in the SBR. SBR has also been updated on the 30-01-20 which lists down the species relating to the incoming stock during 2019. NC can be settled as a result.
<b>NC Status:</b>	Closed

<b>NC number 2019-02</b>	<b>NC Grading: Major</b>
<b>Standard &amp; Requirement:</b>	Std 4 - 6.3.1The legal owner shall implement the requirements of either:PEFC 2002:2013 Section 9: Social, Health and Safety requirements in CoC,OrFSC-STD-40-004 V2-1 EN Section 1.6: Occupational Health and SafetyOr the latest versions of these documents.
<b>Description of Non-conformance and Related Evidence:</b>	
Company Policy (Appendix 1, dated 01-01-19 signed by the Managing Director assures the continued integrity and validity of Factories SBP system and certified products. Company is certified or PEFC. Company has policies for OHS outlined in the SOP in accordance with PEFC certification requirements. No accidents has been recorded over the last 12 months. However during field observations the following lapses were observed - Cigarette buds were found in the feedstock storage area. No warning signs kept in the production floor. - the PPEs required at each critical work station is being displayed at each working area. However lapses observed as no personal were observed wearing ear plugs. - Several fire extinguishers were observed to be kept in inaccessible places. - No spill kits were placed in the fuel storage areas- During the field observations a welder was observed welding without the use of welding shield which demonstrates inadequate awareness on OHS practices.	
<b>Timeline for Conformance:</b>	Prior to (re)certification
<b>Evidence Provided by Company to close NC:</b>	Even though company has a system for OHS management with PEFC certification lapses during the audit were demonstrated as a result of lack of implementation and monitoring. Factory manager was unofficially assigned as in charge of OHS but unclear job scopes and insufficient training has also contributed to lack of focus on health and safety. PPE assessment and risks at each work stations assessed and found to be adequate except for the feedstock storage area. Following corrective actions are taken; - Personal appointed as OHS officer also meeting DOSH requirements. - PPE training and monitoring implemented, in line with the risk assessment performed (with the PPE signs displayed at each working stations) - Smoking has been prohibited within the factory premises.

	-First aid and general health and safety training is conducted. - Fire extinguishers areas have clear access and are not obstructed. - First aid program implemented and First aid materials adequacy checked
<b>Findings for Evaluation of Evidence:</b>	Company has appointed an OHS officer with overall responsibility and has conducted training on OHS and First aid training for all personal. PPE provisions are as a result of the risk assessment conducted (which was sighted during the main assessment where PPE needed for each workspace was displayed). In addition smoking has been prohibited within the factory premises. Evidence submitted also indicate that the fire extinguishers are now stored without obstruction. NC to be settled as a result.
<b>NC Status:</b>	Closed

<b>NC number</b> 2019-03	<b>NC Grading:</b> Major
<b>Standard &amp; Requirement:</b>	Std 4 - 6.3.3 The legal owner shall determine and implement effective arrangements to comply with all applicable laws, rules and regulations in countries where it conducts business activities.
<b>Description of Non-conformance and Related Evidence:</b>	
Company Policy signed 01-01-19 clearly outlines that all operations shall meet all applicable laws and regulations and has listed out laws applicable for their operations in Malaysia and other international treaties. Companies responsibility is only FOB therefore no legal requirements applicable in overseas countries. However compliance has not been assessed with respective laws identified in the legal register. Violations observed under OHS regulations observed as no trained first aiders as per the provisions from DOSH.	
<b>Timeline for Conformance:</b>	Prior to (re)certification
<b>Evidence Provided by Company to close NC:</b>	Further analysis was conducted to identify whether the lapses were only on requirements related to DOSH and it was concluded that the legal compliance was limited to DOSH requirements. The root cause for not identifying the requirement was as a result of ineffectiveness of the system of monitoring legal compliance rather than waiting for the authorities to point out violations if any so the system is more reactive rather than proactive. This has also contributed by not having specific personal made responsible in compliance related issues. Following corrective actions are taken; - Legal law register was updated and person in charge of monitoring and updating was appointed -Compliance has been assessed with respective laws identified in the legal register. - First aid training was conducted as to requirement - First aid trainer has been

	appointed. Additionally as preventive actions legal register is to be reviewed regularly (minimum annually) for changes.
<b>Findings for Evaluation of Evidence:</b>	No non compliance with laws were observed other than DOSH requirements. First aider has been appointed and necessary training is conducted. Also compliance officer has been appointed to implement and monitor the legal requirements.
<b>NC Status:</b>	Closed

<b>NC number</b> Obs 2019-01	<b>NC Grading:</b> Observation
<b>Standard &amp; Requirement:</b>	Std 4- 5.4.2 A legal owner shall record the certificate numbers of the customer to which it supplies biomass, where applicable.
<b>Description of Non-conformance and Related Evidence:</b>	
No sales yet. Also the requirement is yet to be covered in the SOPs. Client is aware of the requirement so the risks are limited. But graded as an observation to ensure the requirement is followed up.	
<b>Timeline for Conformance:</b>	Other
<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>	Hubert Jurczyszyn
<b>Date of decision:</b>	16/Mar/2020
<b>Other comments:</b>	<i>Click or tap here to enter text.</i>