

NEPCon Evaluation of Pellet 4Energia SIA Compliance with the SBP Framework: Public Summary Report

Third 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

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1 Overview

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Current report completion date: 07/Feb/2020

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Name of the Company: SIA Pellet4Energia, "Granulas",

SIA Pellet4Energia, "Granulas", Brocēni district, Ciecere parish, LV-5668,

Latvia

Company contact for SBP: Toms Nāburgs, Toms.Naburgs@neljaenergia.ee, +371 29286295

Certified Supply Base: Sourcing from Latvia and Lithuania, SBE system for Latvia only

SBP Certificate Code: SBP-01-70

Date of certificate issue: 30/Mar/2017

Date of certificate expiry: 29/Mar/2022

This report relates to the Third Surveillance Audit



2 Scope of the evaluation and SBP certificate

The scope of SBP certificate: production of wood pellets at Pellet 4Energia Broceni site and transportation to ports of Ventspils, Liepaja and Hull. The scope of the SBP certificate includes also Supply Base Evaluation, covering primary and secondary feedstock originating within the territory of the Republic of Latvia, and 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 specified SBP Standards are implemented across the entire scope of certification. Evaluation of the practical implementation of the requirements of the applicable standards.

The scope of the evaluation (surveillance audit part) covered:

- Review of the BP's management procedures;
- Production site visit in Broceni parish and review of the production processes
- 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;
- GHG data collection analysis and review of the applicable reports;
- Review of the updated Supply Base Report;
- Evaluation of mitigation measures implemented for both primary and secondary feedstock;
- Field visits of the primary and secondary feedstock suppliers; Review of the reports and records
- Interviews with responsible staff.
- Assess compliance against Instruction Document 5D: Dynamic Batch Sustainability Data v1.1



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)

4.2 SBP-endorsed Regional Risk Assessment

The BP has adopted the risk conclusions in the SBE-endorsed Regional Risk Assessment (RRA) for Latvia, which is available for download from https://sbp-cert.org/wp-content/uploads/2018/12/SBP-endorsed-Regional-Risk-Assessment-for-Latvia.pdf



5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

SIA "Pellet 4Energia" is a biomass producer with a production site and office located in Broceni parish, accountancy office in Riga and temporary storage site situated in Ventspils harbour.

The factory started production of pellets in November 2016. The Pellet 4 Energia is producing both premium and industrial quality pellets.

For the purpose of pellet production the BP sources primary and secondary feedstock.

Pellets are produced from primary feedstock (fuelwood logs – both coniferous and broadleaved species); secondary feedstock: (wood processing industry by-products and residues: wet sawdust, wood chips).

There is a CHP plant, belonging to other company, which is situated at the same address. The CPH is operated by a separate legal entity. SIA Pellet 4Energia is buying heat (hot air) from the CHP. Feedstock used for energy generation at the CHP (wood chips) is not included in the scope of the SBP verification.

All feedstock types are delivered to the pellet plant using road transport (trucks).

All inputs material delivered to the pellet production plant is either FSC or PEFC certified, FSC Controlled Wood or included in the Organisation's own FSC Controlled wood verification system. Company aims to buying FSC certified and FSC Controlled Wood feedstock from certified suppliers and use controlled wood verification system as less as possible.

BP is conducting feedstock origin verification program by visiting suppliers of secondary feedstock and verifying the origin documentation at the supplier premises.

The BP implements FSC credit system. The amount of the biomass products – pellets produced according to FSC credit system can be sold as SBP-compliant and/or SBP-controlled biomass. The BP accepts also PEFC certified and PEFC Controlled Sources inputs. The PEFC certified feedstock is considered as SBP-compliant. The PEFC Controlled Sources feedstock undergoes the SBE verification process to be considered as SBP-compliant.

After the production, pellets are transported to the harbour temporary storage place in Ventspils harbour by trucks. Pellets are loaded into the ship and sent to the customer on FOB Ventspils and DAP Liepaja incoterm conditions as well as CIF Hull conditions.

5.2 Description of Company's Supply Base

BP is sourcing only primary and secondary feedstock for pellet production.



Primary and secondary feedstock in 2018 is originating from Latvia and Lithuania. Only the feedstock originating from Latvia is included in the Supply Base Evaluation system.

Latvia:

3.29 million ha of forest, agricultural lands 1,87 million ha. Forests cover 52% of the total area covered by forests is increasing. The expansion happens due to both natural afforestation of unused agricultural lands and by afforestation of low fertility agriculture land.

Forests lands consist of forests 91,3%, marshes 5.3%, open areas 1,1%), flooded areas 0,5% and objects of infrastructure 1,8%

The main wood species are pine 34.3%, birch 30.8% and spruce 18.0%. Other wood species are aspen, aspen, black alder, ash and oak.

49%% of whole forest area is owned by state, but other 51% are private forests and other forest ownership types (data: State Forest Service statistics, 2018). Management of the state-owned forests is performed by the public joint stock company AS Latvijas Valsts Meži, established in 1999. The enterprise ensures implementation of the best interests of the state by preserving value of the forest and increasing the share of forest in the national economy.

Historically, extensive use of forests as a source of profit began later than in many other European countries, therefore a greater biological diversity has been preserved in Latvia. For the sake of conservation of natural values, a total number of 674 protected areas have been established. Part of the areas have been included in the European network of protected areas Natura 2000. Most of the protected areas are state-owned.

In order to protect high nature conservation values such as rare and endangered species and habitats that are located outside designated protected nature areas, micro reserves are established. According to data of the State Forest Service (2015), the total area of micro reserves constitute 40 595 ha. Identification and protection planning of biologically valuable forest stands is carried out continuously primarily in state forests.

On the other hand, there are general nature protection requirements binding to all forest managers established in forestry and nature protection legislation aimed at preservation of biological diversity during forest management activities. They stipulate a number of requirements, for instance, preserving old and large trees, dead wood, undergrowth trees and shrubs, land cover around micro-depressions thus providing habitat for many organisms, including rare and/or endangered species.

Latvia has been a signatory of the CITES Convention since 1997. CITES requirements are respected in forest management, although none of local Latvian tree and shrub species are included in the CITES annexes. .

Areas where recreation is one of the main forest management objectives add up to 8 % of the total forest area or 293 000 ha (2012). Observation towers, educational trails, natural objects of culture history value, picnic venues: they are just a few of recreational infrastructure objects available to everyone free of charge. Special attention is devoted to creation of such areas in state-owned forests. Recreational forest areas include national parks (excluding strictly protected areas), nature parks, protected landscape areas, protected dendrological objects, protected geological and geomorphologic objects, nature parks of local significance, the Baltic Sea dune protection zone, protective zones around cities and towns, forests within



administrative territory of cities and towns. Management and governance of specially protected natural areas in Latvia is co-ordinated by the Nature Protection Board under the Ministry for Environmental Protection and Regional Development.

5% of Latvian inhabitants are employed in forestry, wood-working industry, furniture production Industry.

The share of forestry, woodworking industry and furniture production amounted to 6 % GDP in 2012, while export yielded 1.7 billion euro (17 % of the total volume of export).

In December 2018 total PEFC Certified Forest Area in Latvia was 1,71 milj hectares and 96 Chain of Custody Certificates. (PEFC Global Statistics: SFM & CoC Certification, December 2018).

In December 2018 total FSC Certified Forest Area in Latvia was 1,13 milj hectares and 317 Chain of Custody Certificates. (FSC Facts & Figures, December, 2018). Lithuania

Agricultural land covers more than 50 percent of Lithuania. Forested land consists of about 28 percent, with 2.17 million ha, while land classified as forest corresponds to about 30 percent of the total land area. The southeaster part of the country is most heavily forested, and here forests cover about 45 percent of the land. The total land area under the state Forest Enterprises is divided into forest and non-forest land. Forest land is divided into forested and non-forested land. The total value added in the forest sector (including manufacture of furniture) reached LTL 4.9 billion in 2013 and was 10% higher than in 2012. According to the ownership forests are divided into state (1.08 million ha), private forests (0,85 million ha) and other ownership types (0.2 million ha).

Forest land is divided into four protection classes: reserves (2 %); ecological (5.8 %): protected (14.9 %); and commercial (77.3 %). In reserves, all types of cuttings are prohibited. In national parks, clear cuttings are prohibited while thinnings and sanitary cuttings are allowed. Clear cutting is permitted, however, with certain restrictions, in protected forests; and thinnings as well. In commercial forests, there are almost no restrictions as to harvesting methods.

Lithuania is situated within the so-called mixed forest belt with a high percentage of broadleaves and mixed conifer-broadleaved stands. Most of the forests - especially spruce and birch - often grow in mixed stands. Pine forest is the most common forest type, covering about 38 percent of the forest area. Spruce and birch account for about 24 and 20 percent respectively. Alder forests make up about 12 percent of the forest area, which is fairly high, and indicates the moisture quantity of the sites. Oak and ash can each be found on about 2 percent of the forest area. The area occupied by aspen stands is close to 3 percent.

Lithuania has been a signatory of the CITES Convention since 2001. CITES requirements are respected in forest management, although there are no local tree and shrub species included in the CITES annexes.

In December 2018 total FSC Certified Forest Area in Lithuania was 1,18 milj hectares and 380 Chain of Custody Certificates. (FSC Facts & Figures, December 2018).

In December 2018 there were 14 PEFC Chain of Custody Certificates. (PEFC Global Statistics: SFM & CoC Certification, December 2018).



5.3 Detailed description of Supply Base

Total Supply Base (ha): 5,47 million ha

Total Supply Base area (ha): Latvia 3,29 mln ha; Lithuania 2,18 mln ha

Tenure by type (ha): Latvia 1,52 mln ha state forests; 1,77 mln ha private forests.

Lithuania 0,22 mln ha forests reserved for restitution, 0,80 mln ha private forests

Forest by type (ha): boreal (hemi boreal)

Forest by management type (ha): 5,47 million ha managed

Certified forest by scheme (ha): Latvia FSC ~1,13 mil/ ha are certified according to FSC and/or ~1,71 milj ha PEFC certification systems, Lithuania ~1,18 mln ha hectares are certified under FSC.

Quantitative description of the Supply Base can be found in the Biomass Producer's Public Summary Report

In Latvian: http://pellet4energia.lv/files/pdf/SBP LV.pdf

In English: http://pellet4energia.lv/files/pdf/SBP_EN.pdf

5.4 Chain of Custody system

The Organisation holds valid FSC Chain of Custody and FSC Controlled Wood certificate, certificate code NC-COC/CW-027631. Valid FSC chain of custody system description and other chain of custody related documents exist.

The Organisation is implementing FSC credit system. FSC Credit system is used for materials received as FSC certified, FSC Controlled Wood and feedstock verified according to the Organisation's own Controlled wood verification system. The Controlled Wood system is covering material originating from Latvia only. Feedstock from Lithuania is sourced with FSC claim in previous audit periods.

After the reception, incoming feedstock is unloaded into piles according to type of feedstock and is registered into the organization's recordkeeping system.

FSC credit account is updated once a month: data on received raw material by FSC certified material certification status and volume of sold pellets with FSC claim are recorded.

In case of FSC and /or SBP sales, the volume of sold pellets is deducted from the credit account.



6 Evaluation process

6.1 Timing of evaluation activities

The annual (third surveillance) audit has been conducted from October 29 till October 31 and November 12, 2019. Annual audit included visiting Broceni production site, staff interviews, field visits, audits to suppliers of both primary and secondary feedstock, including sub-suppliers and contractors.

3.0 days in total were used for the evaluation, - annual audit, including 2 days of onsite audit work verifying documents and 1 day supplier and sub-supplier audits at the FMU level.

Third surveillance evaluation audit plan:

Activity/ timing	Place	Auditor	Date
9.30-10.00 Opening meeting	Production site, "Granulas", Brocēni parish, Saldus municipality	LS, EL	29.10.2019
10.00-17.00	Production site,	LS, EL	29.10.2019
Factory and pellet laboratory visit, employee interviews, record verification.	"Granulas", Brocēni parish, Saldus		
Verified processes (departments visited):	municipality		
1) procurement of raw materials and fuel /			
reception (procurement department /			
raw material reciever);			
(2) moisture measurement (operator /			
Laboratory);			
3) production / accounting (accounting department /			
production manager - information about			
the volume of output produced, use of raw materials;			
The use of energy resources (energy engineer, mechanic);			
Realization/delivery, communication with customers.			
SBE system analysis, interviews with			
responsible staff, risk assessment,			
risk mitigation measures, monitoring,			
risk management, cooperation with suppliers.			
FSC Supply Chain / Controlled Wood			
system verification.			



Choice of suppliers for testing			
15.00-17.00 Visit to pellet storage in Ventspils	SIA Nord Natie Ventspils Terminals in Ventspils	ĒL	
16.000-17.00 Visit to FSC certified secondary feedstock suppliers: a) Secondary feedstock supplier No. 1" (subsupplier of broker)	1) Dobeles municipality, Bikstu parish,	LS	
 9.00- 17.30 One auditor group Primary and secondary supplier field visits: H&S & WKH: FMU "Celmini" (Cad. No. 8425005031, Block 1, comp. No. 3,primary feedstock supplier); FMU "Jaunsedoli" (Cad. No. 64660040067 Block 1, comp. 11; supplier: secondary feedstock supplier); FMU "Gobzemji" (Cad. No. 64940050029, Block 1, comp. 1;primary feedstock supplier); FMU "Čauri" (Cad. No. 64480101013; block 1, comp.1primary feedstock supplier); FMU "Ladi" (Cad. No. 64480101013, Block 3, comp. 4;primary feedstock supplier); FMU "levinas" (Cad. No. 62960050020; block 1, comp.3;primary feedstock supplier) FMU "Vēsminas" (Cad. No. 62920080043, block 4, comp. 11; supplier: secondary feedstock supplier). 	Primary and secondary supplier FMU's	LS	30.10.2018
 Second auditor group: - FMU "Mežkloņi" (Cad. No. 62680030123, block 1, comp. 2) FMU "Aleksandri" (Cad. No. 62780030091, block 5, comp. 2) FMU "Spailes" (Cad. No. 62680060154, block 5, comp. 3) 3 Secondary feedstock suppliers company in Otanku parish, Nicas municipality company in Zirņu parish, Saldus municipality 		ĒL	



Company Kalvenes parish, Aizputes municipality		ЕВ	12.11.2019
8.00-12.00 Interviews with responsible staff, review of the records;	Production site, "Granulas", Brocēni parish, Saldus municipality	LS, EL	31.10.2019
Auditor preparation for submitting preliminary results.		LS, EL	
12.00-12.30 Closing meeting	Production site, "Granulas", Brocēni parish, Saldus municipality	LS, EL	

LA – Liene Suveizda, ĒL – Ēriks Lidemanis, EB – Edgars Baranovs

6.2 Description of evaluation activities

Third surveillance audit:

Auditors were welcomed in Pellet4Energia office in Broceni. Audit began with an opening meeting attended by the company representatives.

In the opening meeting auditors introduced themselves, provided information about the audit plan, audit methodology, briefed about the auditor qualification, explained confidentiality issues, talked over the audit methodology and clarified the scope of the verification.

After the opening meeting auditors checked accountancy records, including supplier registers, procurement and sales documents based on the samples. Processes related to the management, sales, COC system requirements and recordkeeping had been discussed in detail. Auditors went through all applicable requirements of the SBP standards: SBP Standard #1, Standard #2, SBP Standard #4 and SBP Standard #5 and instruction document 5e covering input clarification, existing chain of custody and controlled wood system, CoC, recordkeeping/mass balance requirements, emission and energy data and categorisation of input and verification of SBP compliant feedstock and SBP Controlled feedstock/biomass. Overall responsible person for SBP system and responsible personnel (Quality manager, Production manager, Recordkeeper) having key responsibilities within the system were interviewed during the audit process. Auditors checked the feedstock supply system and the summary of the due diligence system. Auditors carried out a field visit of the factory, checked the reception of raw material and pellet production process, including a visit to the laboratory where different values are being measured for biomass. Applicable records were reviewed, pellet factory staff interviewed and FSC system critical control points analysed.

After factory visit, auditors returned to the office where the audit continued with the discussion of open NCR's and verification of the energy consumption data.



On first day the pellet storage site - Terminals in Ventspils were visited to evaluate risks of material mixing by one auditor.

At the end of first day another auditor visited the subsupplier of broker: secondary feedstock supplier (see Exhibit 9).

On the second day of the audit supplier field visits were carried out.

10 out of 266 FMU's indicated as potential WKHs according to screening using IS "Latbio" were visited to evaluate risk mitigation measure effectiveness. The total number of FMUs the feedstock sourced by BP are 218 FMUs with 1037 forest compartments. After screening results using biotope tool "LATBio" a 266 potential WKHs identified where field visits carried out. The auditors visited 10 FMUs using methodology: sq.r.266X0,6=9,7.

During audited period the BP has sourced from 19 secondary feedstock suppliers. Four sawmills sampled to visit according to methodology (sq.r. from 19x0,8=3,9).

Visited FMU's:

- Health and safety site in FMU "Celmini" (Cad. No. 8425005031, Block 1, comp.No. 3, primary
 feedstock supplier) was visited to check how the company representatives conduct chainsaw
 operator interviews and gear verifications. In the same plot the screening results of biotope tool
 "LATBio" showed the potential WKH and the site was checked according the WKH identification
 methodology.
- FMU "Jaunsedoli" (Cad. No. 64660040067 Block 1, comp. 11; supplier: secondary feedstock supplier sawmill);
- FMU "Gobzemji" (Cad. No. 64940050029, Block 1, comp. 1; primary feedstock supplier);
- FMU "Čauri" (Cad. No. 64480101013; block 1, comp.1; primary feedstock supplier);
- FMU "Ladi" (Cad. No. 64480101013, Block 3, comp. 4; primary feedstock supplier);
- FMU "levinas" (Cad. No. 62960050020; block 1, comp.3; primary feedstock supplier)
- FMU "Vēsmiņas" (Cad. No. 62920080043, block 4, comp. 11; supplier: secondary feedstock supplier- sawmill).
- FMU "Mežkloņi" (Cad. No. 62680030123, block 1, comp. 2)
- FMU "Aleksandri" (Cad. No. 62780030091, block 5, comp. 2)
- FMU "Spailes" (Cad. No. 62680060154, block 5, comp. 3)

On the second day one auditor visited 2 secondary feedstock suppliers No 2 and 3. For details see Exhibit 9

On the third day of the audit, auditors conducted interviews with responsible staff and with the accountant of the company. Energy resources were verified and calculated. Auditors and company representatives discussed SBR updates.

At the end of the audit findings were summarised and audit conclusions based on 3 angle evaluation method were provided to the CEO in the closing meeting.

Closing meeting was held in Pellet4Energia office in Broceni, attended by the factory manager, chief accountant, quality manager, Purchasing Manager, certification manager and other responsible staff.



Findings of the annual audit have been summarised and presented to the responsible persons of the BP. Audit findings were summarised and audit conclusion based on use of 3 angle evaluation method were provided to the responsible persons at the company – certification manager, purchase manager and the production/factory manager.

On 12.11.2019 1 of FSC certified suppliers of secondary feedstock (sawmills) has been visited for field inspection by auditor Edgars Baranovs within annual FSC CoC/CW audit.

Composition of audit team, third surveillance evaluation audit:

Liene Suveizda, SBP Lead auditor (Standards #1, # 2 and 4)	Joined NEPCon Latvia in 2016. M.Sc in biology, forest ecology. Graduated from University of Latvia. Liene has also studied law and hold the 2nd level higher education in law, Business School "Turība". Liene has long term experience in forestry sector in Latvia. Liene has passed the NEPCon lead assessor training course in FSC Forest Management and FSC Chain of Custody operations and obtained the FSC lead auditor qualification. Liene has participated as an auditor in training in SBP assessment and scope change (SBE) audits in Latvia. She has obtained the SBP auditor qualification.
Ēriks Lidemanis, auditor (Standard #5)	In Nepcon SIA since 2017. Eric has graduated the Forest Faculty of Latvian Agricultural University and has obtained a bachelor's degree in forest science. Previous experience in the woodworking sector. Obtained the qualification of the FSC and PEFC supply chain auditor and performed FSC supply chain audits in woodworking companies in Latvia. Obtained FSC FM and SBP auditor qualification. He has participated in several SBP assessment and surveillance audits in Latvia. Eriks has experience in SBE evaluations.
Edgars Baranovs Auditor	Edgars has been working for NEPCon SIA. since 2018. Graduated from the Forest faculty of Latvia University of Agriculture and has a master degree in Environmental Sciences. Edgars has experience in the State Forest Service of Latvia. In the fall of 2018, he obtained the qualification of an FSC Supply Chain Auditor, FSC FM and SBP auditor. Edgars has taken part in some SBP assessments and surveillance audits in Latvia.

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6.3 Process for consultation with stakeholders

Annual audit:

No additional stakeholder consultation was conducted prior to the third surveillance audit and not related to the current certification scope.



7 Results

7.1 Main strengths and weaknesses

Strengths: elements of SBP system have been fully implemented at the time of the surveillance audit. The BP uses the FSC chain of custody system with credit system for certified material flow control. The BP has an effective recordkeeping system. Small number of the personnel involved in the management of the production processes and clearly delegated responsibilities for staff members. SBP and SBE processes are well documented; main database for material balances is well maintained and all relevant information can be easily retrieved and reported. Primary and secondary feedstock suppliers had participated in biotope identification training courses organised by external party - respected Latvian experts and trained their suppliers. Strong commitment in implementation of SBP system and positive approach has been observed during the audit.

Weaknesses: as a major deficiency, the effectiveness of internal control is considered to be insufficient. See detailed information of audit findings in section - Annex A of the report. See also in NCR section (Section 10) of the report.

7.2 Rigour of Supply Base Evaluation

SIA Pellet 4Energia is implementing the SBE for primary and secondary feedstock (forest products) originating from Latvia and sourced without SBP- approved Forest Management Scheme claim, SBP- approved Forest Management partial claim, SBP - approved Chain-of-Custody (CoC) System claim. The BP is implementing risk mitigation measures for feedstock sourced from forest land (material sourced under FSC Controlled Wood system). No primary feedstock from non-forest lands, such as arboricultural arisings (from overgrown agricultural land, wood growing along the drainage systems, roads, railway lines etc.) is used as input material for production of SBP-compliant biomass.

The BP has used the draft of the regional risk assessment presented on the SBP website for stakeholder consultation in 2017 and has only updated some few "Locally Adaptable Verifiers" which were considered to be more specific for their supply base. Based on the identified "specified risks" in this risk assessment the organization has suggested several mitigation measures which were consulted with relevant stakeholders during several meetings which took place prior to the surveillance audit.

The stakeholder consultation process has been conducted through notification of stakeholders and distributing the SBR report and describing risk mitigation means to stakeholders. Most stakeholders were contacted directly via phone and where the stakeholders were interested in expressing their opinion a faceto-face meeting took place. The BP keeps records of communication with stakeholders.

After consensus with stakeholders was reached, SIA Pellet4Energia has undertaken implementation of the mitigation measures for individual indicators. Those mitigation measures were designed in cooperation with nature protection and forestry experts and external consultants.

Since 28.09.2017 the BP uses the SBP-endorsed Regional Risk Assessment for Latvia. The SBP-endorsed Regional Risk Assessment foreseens the same risk mitigation measures as the previous draft of Regional Risk Assessment.



7.3 Collection and Communication of Data

The BP has established procedures and responsibilities for collecting and communicating GHG and transport data in accordance with the requirements in SPB standard 5, and the associated Instruction Document 5e. It was found during the audit that the systems from monitoring and recording production related GHG data were well established. BP uses diesel for feedstock transportation and handling onsite, electricity for biomass production, diesel for biomass transportation to harbour, and diesel and electricity in harbour for biomass handling and loading to the vessel. Diesel consumption for feedstock transportation to production site, and biomass transportation to harbour is based on information obtained from haulers. Electricity and diesel consumption at production site is based on actual values, and electricity and diesel consumption in harbour is based on actual data obtained from harbour.

7.4 Competency of involved personnel

During the surveillance audit it was identified which staff members are involved in management and implementation of the SBP system. Those are Board Member/ Export Manager, Production Manager, Technologist, Transport Manager, Pellet Production Factory Work Allocation Manager, Forest Logging Manager, Stock Controller, Loading truck drivers and Pellet mill operators.

Mentioned staff members were interviewed during the third surveillance audit and all demonstrated awareness of their responsibilities within the SBP system. In overall, auditors evaluate the competency of main responsible staff to be sufficient for implementing the SBP system with both primary and secondary material sourced within the SBE. This has been based on interviews, review of qualification documents, training records and set of procedures and documents that were composed for the SBP system as well as field observations during the annual surveillance and scope change audits.

The Supply Base Evaluation (SBE) system is implemented by existing organization staff that has undergone external training and is supervised by responsible person at the company –member of the board/export manager and helped by external consultant. Internally there are different staff members responsible for different aspects of the SBP certification.

Member of the board/export manager holds the overall responsibility for SBP and SBE system, as well as procurement and supplier related issues. Responsibility is fixed in documented procedures as well as internal documents of the organization (order).

Quality manager is responsible for SBE system implementation and supplier audits. Accountancy staff is responsible for recordkeeping, accounting. Office manager is responsible for verification of incoming feedstock registration and mass-balance accounting. Material receptionists are responsible for incoming material reception, identification of material status and subsequent classification of feedstock in the accountancy system. Pellet production operators are responsible for moisture measurements and production recordkeeping.

Involved personnel, including responsible staff at suppliers and sub-suppliers have demonstrated sufficient knowledge in relevant fields, including knowledge of critical aspects - recognition and identification of HCVF, health and safety requirements. Relevant certificates and diplomas were presented. Qualification requirements for personnel (to be) involved in SBE system are provided in documented procedures of the BP.

During surveillance audit a NCR raised regarding credit account, PEFC Controlled Sources feedstock classification. The non-conformity caused by unsufficiancy of internal quality control system. In general, auditors evaluate the competency of main responsible staff to be sufficient for implementing the SBP system with both primary and secondary feedstock sourced within the SBE. This has been based on interviews,





review of qualification documents, training records and set of procedures and documents that were composed for the SBP system as well as field observations during the audit.

7.5 Stakeholder feedback

No comments regarding the SBP SBE system for primary and secondary feedstock sourcing within the SBE system were received during the audit period. No stakeholder consultation was done before the annual surveillance audit.

The stakeholder consultation was carried out by the CB in first assessment and scope change audits showed that BP's stakeholder consultation process was comprehensive and all key stakeholders were involved in the process. Consultation confirmed that the stakeholders already expressed their opinion to biomass producer.

The stakeholder consultation carried out by the CB showed that BP's stakeholder consultation was comprehensive, well documented (See documented responses from stakeholders during stakeholder notification process in Exhibit 10 (2017) and principal stakeholders were involved in the consultation process. Consultation confirmed that the stakeholders already expressed their opinion to biomass producer or did not have comments.

7.6 Preconditions

No open preconditions related to this evaluation exist.



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 <u>after</u> the SVP has been performed and after any mitigation measures have been implemented.

The SBP endorsed risk assessment for Latvia outlines "specified risk" for indicators 2.1.1 (only HCVF category 3), indicator 2.1.2 (HCVF categories 1, 3 and 6) and indicator 2.8.1. Mitigation measures planned and implemented by the BP can be considered sufficient in order to reduce the risk to "low risk" for indicators mentioned. See risk ratings in Table 1.

Risk assessment taking into consideration risk mitigation measures is presented in Table 2. It is concluded that the actions taken (for the suppliers included in the SBE) by the BP lead to substantial decrease of the risk and the final risk level for all indicators can be considered as "low risk".

Table 1 Risk ratings for SBP SBE Indicators

	Risk rating	
Indicator	(Low or Specified)	
	Producer	СВ
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	Specified	Specified
2.1.2	Specified	Specified
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	СВ
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	Specified	Specified
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low



Table 2. Final risk ratings of Indicators as determined after the Supplier Verification Program and mitigation measures.

	Risk	rating
Indicator	(Low or Specified)	
	Producer	СВ
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

	Risk rating	
Indicator	(Low or Specified)	
	Producer	СВ
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

Mitigation measures of risks for feedstock originating from Latvia. The organization has designed and is in the process of implementing mitigation measures for 3 indicators evaluated as specified risk (2.1.1, 2.1.2 and 2.8.1). The BP has also updated the supplier contracts with clause requiring the supplier to agree to take necessary actions to avoid supplying material whose risks cannot be mitigated.

To mitigate risks of mentioned 3 indicators at secondary feedstock level, the BP accepts secondary feedstock only from approved suppliers, which provide "low risk" or in BP's classification "SBE NR" primary feedstock only. Primary feedstock suppliers are checked and verified by the BP. The risk mitigation measures for secondary feedstock is also carried out by BP. The BP get's information from sawmills on weekly basis about cutting sites the wood is originating and provided to sawmills and carries out the risk mitigation measures.

Indicator 2.1.1 (HCVF category 3):

Woodland Key Habitat tool ("WKH tool") was developed by biomass producers in Latvia united under the Latvian biomass association "LATBio" with purpose to mitigate risks related to sourcing feedstock from High Conservation Value Forests (Woodland Key Habitats and/or forest habitats of EU importance in particular). The tool is used in sourcing of feedstock from private forest owners and shows "Risky areas" which may comprise Woodland Key Habitats and/or forest habitats of EU importance and "Green areas" which most likely do not comprise HCV areas (WKHs and/or EU forest habitats). The tool is based on existing forest inventory databases and implements filtering forest inventory databases using the algorithm from "Inventory of woodland key habitats; methodology" (T. Ek, R. Auziņš, Mežaudžu atslēgas biotopu inventarizācija, Valsts meža dienests, Ostra Gotaland Meža pārvalde Zviedrija, 2002). The tool has been verified in field verification process that took place (carried out by licenced forest ecology, biodiversity experts) to verify the correctness of the methodology and the algorithm implemented. Five different areas in Latvia were visited (each area ca. 200 ha) which have proved that the tool shows correct data and the WKH is not present in the "green areas". The WKH tool is used by the BP. The BP has defined the following approach for risk mitigation with regard to identification of high conservation values - all harvesting sites in the SBE system shall be screened using WKH tool "LATBio" and inspected and evaluated for presence of high conservation values according to WKH checklist. If necessary other data bases can be used (for example Nature Conservation Agency database). The checklist has been elaborated by forest habitat experts in Latvia and are used by many SBP certified biomass producers and forest management companies. The screening and evaluation of WKH are carried out before or during forest harvesting for supplies from approved suppliers.

The BP does not accept feedstock originating from areas/logging sites which show up in the Latbio or Nature Conservation Agency databases as "risky areas", i.e. where there is probability of High conservation values. The BP requires documental approval for tree felling – Felling Permit copy for all loads of feedstock sourced. All suppliers supplying feedstock from private owned forests are regularly audited – harvesting sites are regularly sampled and inspected by the BP.

To mitigate risks of mentioned indicator at secondary feedstock level, the BP accepts secondary feedstock only from approved suppliers, which source "low risk" primary feedstock only. Primary feedstock suppliers supplying to sawmills are checked and verified by the BP. The BP get's information



from sawmills on weekly basis about cutting sites the wood is originating and provided to sawmills and carries out the risk mitigation measures.

Indicator 2.1.2 (HCVF category 1):

The BP has required all suppliers of primary and secondary feedstock included in the SBE to undergo a training course for identification high conservation values in forest ecosystems. The training course is organised held by recognized forest ecology and forest habitat experts. Different suppliers, including suppliers and sub-suppliers of primary and secondary material have participated in the trained training course and obtained knowledge on how to recognize woodland key habitats using special checklist, recognize important bird habitats and nesting sites and how these shall be protected.

Each supplier is required to evaluate all sites prior to harvesting and evaluate the presence of Woodland Key Habitats, large diameter nest or protected bird species. Interviews with suppliers as well as review of records showed that the procedure is followed by approved suppliers. In case of longer supply chains, e.g. primary processors supplying secondary feedstock or traders/brokers, supplier of material to BP shall make necessary risk mitigation measures to assure that the feedstock can be considered low risk. In case of sub-suppliers, supplier shall verify that the material supplied by sub-supplier is not being sourced from areas with WKHs and with appropriate H&S risk mitigation. In many cases the suppliers are actually evaluating the site prior to purchasing it and in case there is occurrence of large bird nests of indicative presence of potential WKH, they do not purchase the stand.

BP is monitoring the evaluation of the sites during regular supplier audits (frequency of the audits determined in documented procedures).

Indicator 2.1.2 (HCVF category 3):

The BP checks every supply of primary feedstock that is going to be supplied as low risk material by filling in the WKH inventory checklist. In case the area is identified as potential Woodland key habitat as a result of supplier own evaluation, the feedstock cannot be supplied as the material with "low risk" claim. The BP or supplier, however, can invite certified biotope expert to evaluate the harvesting site for presence of WKH. In case the decision is negative, the site can be harvested and supplied to BP as "low risk" feedstock.

Secondary feedstock suppliers are sourcing raw material from BP controlled and approved suppliers. Only BP approved primary feedstock suppliers can supply feedstock. List of approved primary suppliers is available.

To mitigate risks of mentioned 3 indicators at secondary feedstock level, the BP accepts secondary feedstock only from approved suppliers, which provide "low risk" primary feedstock only. Primary feedstock suppliers are checked and verified by the BP. The risk mitigation measures for secondary feedstock is also carried out by BP. The BP get's information from sawmills on weekly basis about cutting sites the wood is originating and provided to sawmills and carries out the risk mitigation measures for all 3 indicators.

Indicator 2.1.2 (HCVF category 6):

The specified risk for this sub-indicator relates to noble tree species with large diameter which might be coming from old manors, parks or tree alleys having cultural heritage value. The BP has implemented procurement policy that noble species will not be sourced and in case it will be the diameter can't exceed 70cm. The interview with the receptionist as well as site tour through the storage area proved that no noble tree species are received. This procedure is also followed by suppliers of secondary material (sawmills and brokers/traders) by applying BP's procedure. Field inspections at suppliers of



secondary feedstock showed that this requirement is followed in general. Interviewed responsible staff showed awareness of the requirement. Site tour through the storage areas showed that small amount of large diameter and noble tree species are present. It has been explained also by interviewed persons, that large diameter trunks are sometimes received with FSC certified material from state forest enterprise and are delivered with certification claim. Certified feedstock are out of the scope of SBE.

Indicator 2.8.1:

Each supplier is checked for H&S issues by the BP prior to accepting him as a supplier under the SBE system. The BP uses checklist which is filled in during interviews with the workers in the forest. Each supplier is checked in several forest plots before becoming accepted supplier.

Monitoring of suppliers is carried out regularly, at least one surveillance audit in 6 months per each supplier. In case the BP identifies one aspect of the H/S not fulfilled during the monitoring visits, the supplier gets notification and the feedstock is not sourced from particular supplier until the corrective action is implemented, confirmed by additional H&S audit.

The supplier audits are conducted by the BP itself. In additional to this sub-suppliers and sawmills are conducting internal audits for their suppliers. BP does verify supplier audits methodology and conducts audits..

SBE primary verified feedstock with "low risk" status in the sales invoices are accepted by sawmills as low risk material and accounted. See the detailed description in section 9.1 Annex B. Number of the suppliers to sawmills is limited to approved SBE suppliers. All volumes of the primary feedstock delivered to sawmills is reported to the BP.



10 Non-conformities and observations

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

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

NC number 02/20	NC Grading: Minor
Standard & Requirement:	SBP Standard # 2, 17.1. Instruction Note 2C, 4.1

Description of Non-conformance and Related Evidence:

The requirement is provided in BP's documented procedure "SBP atbilstoša materiāla apstiprināšana, verifikācija, riska mazināšanas process", section 8. The BP is aware of this requirement as can be concluded from interview to the responsible person at the BP. The BP has prepared annual updates in Chapters 2.4., 2.5., 13.4., 13.5. regarding supplied and used feedstock, produced biomass etc. During SBR review recklessness errors were found: false measurement units of SB (m3 instead of ha, Ch.2.5), luck of written justified reasons why the feedstock information provided in bands in chapter 2.5. is commercially sensitive, unspecified risk according risk assessment in Chapter 3. As well incorrect naming of applied instruction documents of Standard 5 (Chapter 1) in Latvian version of SBR and editorial differences in chapters 2.1., 13.4 between English and Latvian version of SBRs found. Since these shortcomings do not affect the substance of the report as a whole, a minor NCR 02/20 raised.

Timeline for Conformance:	By the next surveillance audit, but no later than 12 monhts from report finalisation date
Evidence Provided by	Updated SBR: English version:
Company to close NC:	http://pellet4energia.lv/files/pdf/SBP_EN.pdf , Latvian version: http://pellet4energia.lv/files/pdf/SBP_LV.pdf)
Findings for Evaluation of Evidence:	During preparation of audit report the BP provided an updated SBR versions (http://pellet4energia.lv/files/pdf/SBP_EN.pdf, http://pellet4energia.lv/files/pdf/SBP_LV.pdf). The BP has fixed some errors in updated version of SBR. Still several shortcomings still found the minor NCR 02/20 remains open.
NC Status:	Open

CLOSED Non-conformance reports (NCRs):

NC number 01/20	NC Grading: Major
Standard & Requirement:	SBP Standard # 4, Requirement 5.3.1 SBP Standard # 4, Requirement 5.3.1

Description of Non-conformance and Related Evidence:

During the audit it was found that the FSC/SBP credit system was not functioning correctly: the input and outputs groups were not correctly identified according to FSC/SBP CoC system requirement. Since the function of a credit system is central to the validity of the certification claims, a Major Non-conformity is raised. Since similar major NCR 02/19 raised during second surveillance audit an Major NCR with 1 month timeline for conformance set.

Timeline for Conformance:	Other 1 month from closing meeting
Evidence Provided by Company to close NC:	Updated credit table, volume summary.
Findings for Evaluation of Evidence:	During the audit report preparation period the Organisation provided a credit table according to FSC/SBP CoC standard requirements. The updated credit account documented that no overdraft of the credit account had occurred, which was well-aligned with the auditors' evaluation of the volume data based on the production and sales records. The major NCR 01/20 closed.
NC Status:	Closed

NC number 03/20	NC Grading: Minor
Standard & Requirement:	SBP Standard # 4, ID 4B 1.3.

Description of Non-conformance and Related Evidence:

The use of SBP trademarks included in procedure "SBP sertifikācijas sistēmas apraksts" (Chapter 20). During document review it was observed that BP has used the previous SBP programmes name on it's webpage. The webpage contained the old name of program – Sustainable Biomass Partnership. Minor NCR 03/20 raised.

Timeline for Conformance:	By the next surveillance audit, but no later than 12 monhts from report finalisation date
Evidence Provided by Company to close NC:	Updated webpage.



Findings for Evaluation of	During preparation of audit report the BP has updated the BPs
Evidence:	webpage. The BP has changed programs name to the "Sustainable
	Biomass Program". See http://pellet4energia.lv/;
	http://pellet4energia.lv/en/. The minor NCR closed.
NC Status:	Closed

NC number 01/19 (26435)	NC Grading: Minor
Standard & Requirement:	SBP Standard # 2, Requirement 16.1

Description of Non-conformance and Related Evidence:

During the audit it was found that material sourced from suppliers of secondary feedstock in few cases was not delivered with documentation for the necessary risk mitigating measures relating to identification and protection of Woodland Key Habitats. It was found that a proportion of the material originated from forests that is identified in the biotope tool (the LATBio biotope tool (http://latbio.lv/MBI/search_db) as red areas; i.e. areas where there is an increased chance of presence of WKH and supplied to sawmills is not fully included in BP verification system. The BP explained that there is often an overlap between felling areas from which fuel wood logs have been delivered, and hence have been subject to identification and protection of WKHs, and the felling areas from which sawlogs have been harvested and the secondary feedstock have been derived. Since the gap pertain only a small proportion of the total volume of biomass, and the prevalence of WKH in the red areas is low, the non-conformity is raised as a minor NCR 01/19.

Timeline for Conformance:	By the next surveillance audit, but no later than 12 monhts from report finalisation date
Evidence Provided by Company to close NC:	Updated procedure, interviews, incoming primary and secondary feedstock documentation.
Findings for Evaluation of Evidence:	The BP has improved the primary and secondary feedstock sourcing methodology. The procedure foreseens collecting origin information and performing risk mitigation measures to all kind of incoming feedstock. The BP collects, registers and analyses origin information and carries out risk mitigation measure for all incoming primary and secondary feedstock. During documentation review at BP and sawmill level no gaps identified. The NCR 01/19 closed.
NC Status:	Closed

NC number 03/19 (26437)	NC Grading: Minor
Standard & Requirement:	SBP Standard # 5, Instruction document 5b, Requirement 5.1.1

Description of Non-conformance and Related Evidence:

The collection of data for transport distances for feedstock is based on the driver self-registering the driven distance from the forest origin to the pellet mill. The system was demonstrated during the audit, and was found to be practical and sufficient. However, upon the review of the reported transport distances it



was found that there were 415 instances of "0" registrations, corresponding to app. 10% of all entries. During the audit, the responsible staff evaluated and corrected the "0" registrations, based on supplier and felling permits. Since the necessary calculations was possible, even if the system for truckdrivers reporting the transport distances was not successfully implemented a minor NCR was raised.

Timeline for Conformance:	By the next surveillance audit, but no later than 12 monhts from report finalisation date
Evidence Provided by	Overall incoming material register, interview with wood measurement
Company to close NC:	specialist at weighbridge.
Findings for Evaluation of	During the audit incoming material register was verified and auditors
Evidence:	didn't identify any cases where it was transport distances weren't registered. During the interview with wood measurement specialist he described that in cases when truck driver is not registering transport distance, he is doing it manually by verifying origin of material stated in delivery note.
NC Status:	Closed

C Grading: Observation
3P Standard # 5, Instruction document 5b, Requirement 3.2.9

Description of Non-conformance and Related Evidence:

The BP generally uses practical and reliable sources of information and acceptable justification where appropriate. However, during the audit is was found that there was a small difference between the energy recorded usage data for electricity and heat and the actual invoiced Mega Watt hours of electricity and heat. The differences found where between 0,6% and 2,7%, and in all cases the records from the internal meters were higher than the invoiced numbers.

Timeline for Conformance:	Other
Evidence Provided by	SAR, invoices for electricity and heat.
Company to close NC:	
Findings for Evaluation of	During the review of SAR and comparing the information provided in it
Evidence:	with information that is acceptable in invoices and electric and heat
	meters auditors concluded that information is accurate.
NC Status:	Closed



NC number 05/19	NC Grading: Minor
THE HUMBER GO, 10	No Grading. Willion
Standard & Requirement:	SBP Standard # 2 7.5 The SBR shall be updated at least annually
	(i.e. every 12 months).
Description of Non-conformance	e and Related Evidence:
During document review it was found that in section 2.5 there are inaccuracies in statistics describing the primary, secondary and total feedstock volumes. The total feedstock amount is lower than arithmetic sum of primary and secondary feedstock and lower then amount mentioned in section 13.4. According the information provided by BP and annual volume summary the failure caused by subjective carelessness. A minor NCR 05/19 raised.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 monhts from report finalisation date
	finalisation date
Timeline for Conformance: Evidence Provided by Company to close NC:	· ·
Evidence Provided by	finalisation date
Evidence Provided by Company to close NC:	finalisation date Updated SBR
Evidence Provided by Company to close NC: Findings for Evaluation of	finalisation date Updated SBR The BP has prepared updates to SBR in sections 2.4., 2.5., 4, 13.4.,



11 Certification decision

Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:	
Certification decision: Certification approved	
Certification decision by (name of the person):	Nikolai Tochilov
Date of decision:	07/Feb/2020
Other comments:	Click or tap here to enter text.