NEPCon Evaluation of Holzkontor und Pelletierwerk Schwedt GmbH Compliance with the SBP Framework: Public Summary Report

First Surveillance Audit

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The promise of good biomass

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

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:	NEPCon OÜ, Filosoofi 31, 50108 Tartu, Estonia
Primary contact for SBP:	Ondrej Tarabus ot@nepcon.org, +34 605 638 383
Current report completion date:	08/Feb/2021
Report authors:	Michael Kutschke
Name of the Company:	Holzkontor und Pelletierwerk Schwedt GmbH, Germany
Company contact for SBP:	Sylwia Senczyszyn

Certified Supply Base:	Primary and secondary feedstock sourced from: Poland and Germany
SBP Certificate Code:	SBP-01-89
Date of certificate issue:	20/Jan/2020
Date of certificate expiry:	19/Jan/2025

This report relates to the First Surveillance Audit

2 Scope of the evaluation and SBP certificate

Scope description: Production of wood pellets, for use in energy production, at Holzkontor und Pelletierwerk Schwedt and transportation to Schwedt port (Germany) and port of Szczecin (Poland). The scope of the certificate does not include Supply Base Evaluation. The scope includes communication of Dynamic Batch Sustainability Data.

The supply base can potentially contain Germany and Poland.

The BP is using both primary (Roundwood) and secondary (wood chips, offcuts and sawdust) feedstock for their wood pellets production.

The BP has implemented the PEFC volume credit system and at the same time PEFC Physical separation system for non-certified material, which is not included in the PEFC Due Diligence System (DDS).

The BP produces both premium and industrial pellets, but only the industrial pellets is produced as SBP certified. The pellets stored at the BP location until the vessel is ready to load the material. Once the vessel is in the port, the pellets are transported to the harbour by trucks. The biomass is sold at Schwedt and Szczecin harbour under the FOB incoterms.

3 Specific objective

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

The scope of the evaluation covered:

- Review of the BP's management procedures;
- Review of the production processes, production site visit;
- Review of PEFC system control points, analysis of the existing PEFC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients;
- GHG data collection analysis.

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

Holzkontor und Pelletierwerk Schwedt GmbH (HPS), founded in 2006, is a wood pellets producer situated in the German municipality Schwedt/Oder on the Polish border. The pelletizing plant with a capacity of 120 000 tonnes a year produces 6 mm pellets according to ENplus A1 or industrial standards.

HPS is a PEFC certified pellet producer. Its direct suppliers of feedstock are PEFC or FSC certified. HPS has 5 to 10 direct suppliers, indirectly the wood comes from around 40 to 50 suppliers, mainly sawmills and vertically integrated wood processors. HPS practically uses only secondary feedstock (wood residues such as sawdust and shavings), rarery HPS uses primary feedstock (stems disposed of by wood processors). Around 50% is SBP-compliant Secondary Feedstock, 50% SBP-controlled Secondary Feedstock.

HPS has no direct impact on forest management practices. However, by buying from PEFC and/or FSC certified companies, HPS does guarantee that best practices are promoted and no locally protected tree species are harvested.

Regarding the regional forest and wood sector, HPS is a medium-size company. Considering specifically the use of wood residues, there are a few similar in size companies in the region. By producing wood pellets, HPS adds value to low-grade wood residues and creates jobs.

HPS uses only coniferous wood for pellet production of the following tree species:

- Scots pine (Pinus sylvestris) and some other pine species (Pinus spp.);
- Norway spruce (Picea Abies) and some other spruce species (Picea spp.);
- European larch (Larix decidua) and a few other larch species (Larix spp.);
- Several fir species (Abies spp.);
- Douglas fir (Pseudotsuga menziesii).

The supply base is Poland, Germany and Czechia.

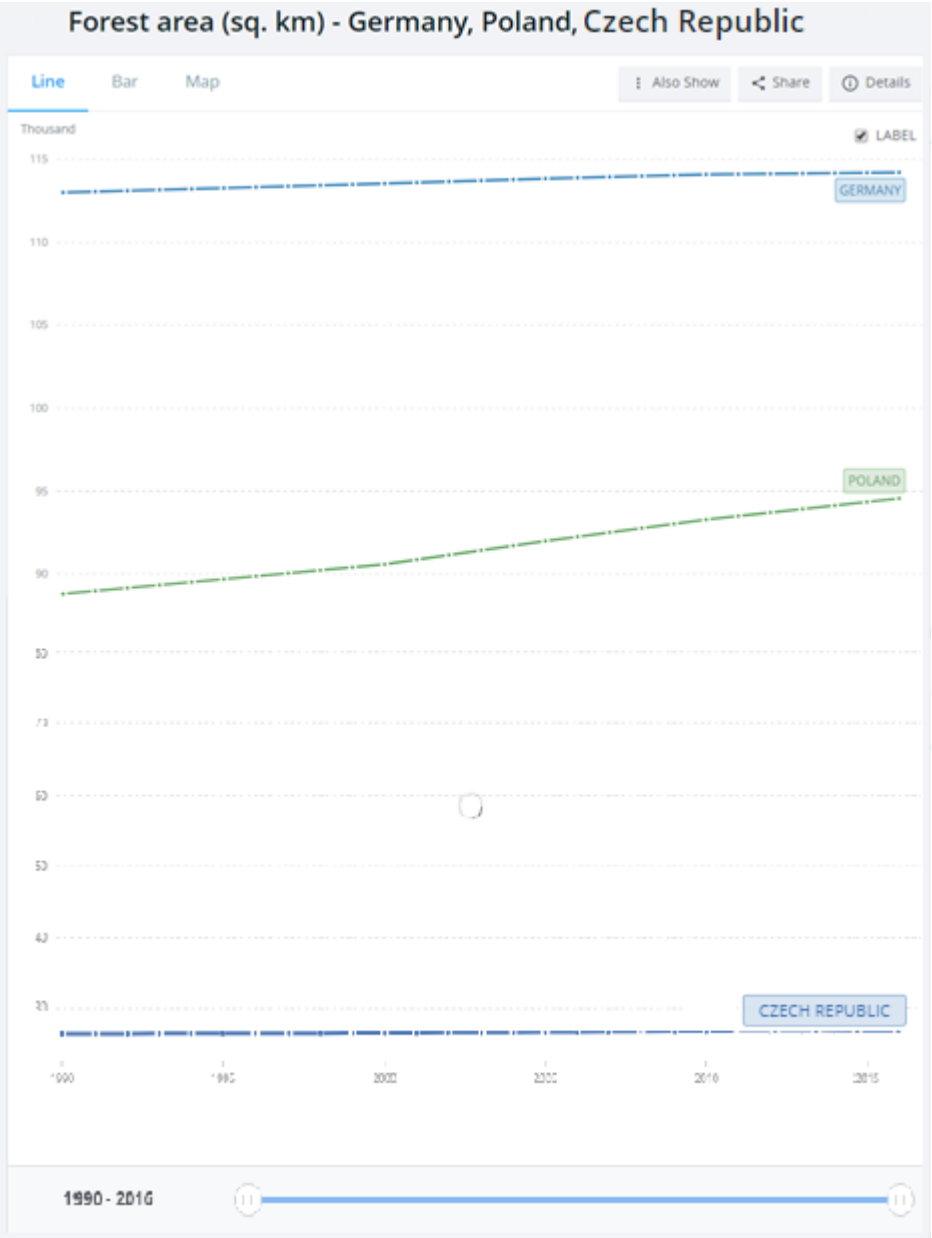
Germany and Poland have temperate forests, which are characterised by a mix of deciduous and coniferous tree stands. A broad array of silvicultural methods are applied. Small clear cuts and selective cuttings are used in most cases. Forests often do not need to be replanted, as they regenerate well naturally.

German and Polish forests belong to the best performing in Europe.

The forests of Czechia are amongst the most productive in Europe. The annual actual cut over 6 m3 per hectare is below the annual average increment. In general, the principles of sustainable forest management are being adhered to.

5.2 Description of Company's Supply Base

Table 1: FAO data on forest area development in Germany, Poland, and Czechia (source: World Bank website)



The FSC National Risk Assessment for Germany did not find any specified risks to sustainability.

The FSC National Risk Assessment for Poland resulted in a specified risks on:

- The right to freedom of association and collective bargaining;
- The protection of sites and species in the Bialowieża, Hajnówska, and Browsk Forest Districts;
- The conservation of High Conservation Values in the protected forest of Bialowieża (Hajnówska, and Browsk Forest Districts) and in the Krosno Regional Directorate of State Forests.

The FSC National Risk Assessment for the Czech Republic resulted in two specified risks, one on HCV 1 (Species diversity) and one on HCV 3 (Ecosystems and habitats).

CITES species are present in Germany, Poland and Czechia but do not include any trees. Germany, Poland and Czechia have adopted a Red List classification of species in accordance with criteria from the International Union for Conservation of Nature (IUCN).

Below a description is given per country.

Germany

In Germany the forest area is 11.4 million hectares which corresponds to about 33% of the total land area of 34.9 million hectares (FAO 2016). Between 1990 and 2016 the forest area has increased by 1,1%.

Of the 11.4 million hectares of forest in Germany 67% is private property (of which 19% is owned by corporations) and 33% is public property (4% is owned by the Federal Government, 29% by the provinces).

Private woodlands in Germany is predominantly small and fragmented. About half of the private forest plots are less than 20 hectares. German forests are diverse and offer habitats for many animals and plants.

In forests under all types of ownership less wood was harvested than grown. Timber stocks amount to 3.7 billion m³ in total and 336 m³ per hectare in average. The increment of timber is in average 11.2 m³ per hectare a year and 121.6 million m³ per year in total. Between 2002 and 2012 around 76 million m³ of raw timber (cubic metres of timber harvested not including bark) were used per year. The forests in Germany are acting as a sink and relieves the atmosphere of around 52 million tonnes of carbon dioxide annually.

According to the results of the third Federal Forest Inventory 2011/2012 some 36% of the forest area is classified as very natural (14.5%) or as natural (21.3%). The proportion of natural forest areas in state forests (around 40%) is higher than in private forests (around 30%).

State forests are generally certified according to the requirements of the PEFC or FSC certification systems and are managed accordingly. A total of around 67% of all forests are PEFC certified and 10.5% FSC.

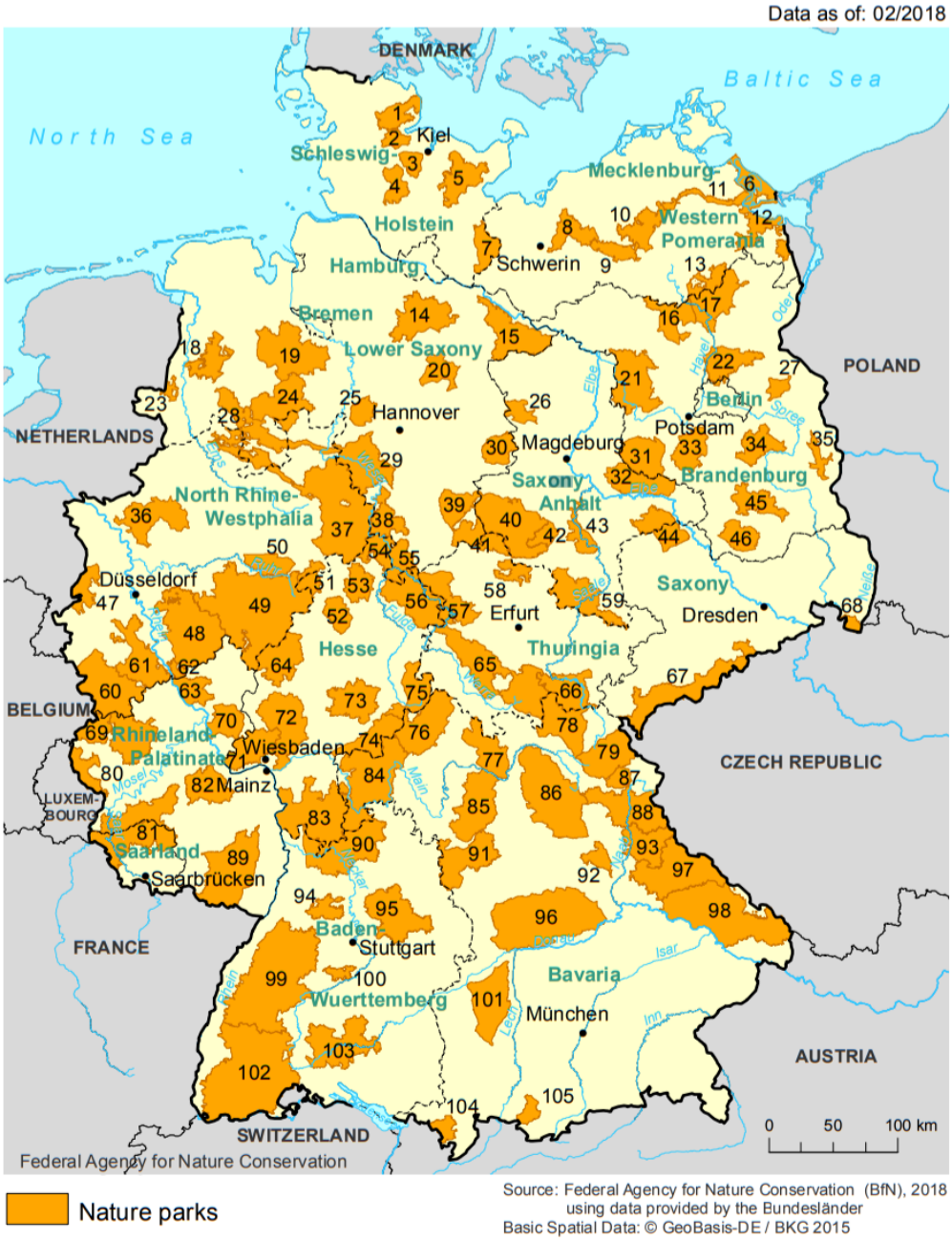
Mixed forests dominate in Germany with a 76% share of the total forest area. Spruce, pine, beech and oak account for 73% of the forests. At present deciduous trees account for 43% of the forest cover and coniferous trees 57%. Spruce is present all over the country but mainly from the foothills of the Alps to the highlands of the south and south-west of Germany and the central uplands. Pine is found mainly in the north-east lowlands, from Lower Saxony to Brandenburg and Saxony.

The forests are in average 77 years old. Oak forests are in average 102, beeches 100, and firs 96 years old. Douglas fir forests are the youngest at 45 years old in average. Almost a quarter of the forest (24%) is older than 100 years and 14% is older than 120 years. In the German forests is in average 20.6 m³ deadwood per hectare (around 224 million m³ of deadwood in total). The deadwood stock has reached 6% of the living timber stock. Natural regeneration is predominant in Germany, planting accounts only for 13% of the young stock.

Germany has 16 National Parks covering approximately 2145 km² (not including the North Sea and Baltic areas). This is 0.6% of the total land area. About 17% of the German forest consists of protected areas according to the European Directive on Fauna Flora Habitat (FFH Directive) thus forming part of the European protected area network "Natura 2000". There are specially protected biotopes over some 593 thousand hectares, i.e. 5% of the forest area. These are in most cases (77%) forest mire, marsh woods or floodplain forests, as well as other wetland biotopes.

Germany has 105 nature parks with a total area of 10.1 million ha, nature parks cover 28.4 percent of Germany's land surface. The share of land covered by nature parks increased by 42% (about 3.0 million ha) between 1998 and 2017. Protected areas account for some 56% of land within nature parks. Nature conservation areas account for about 5 percent of land in nature parks in Germany although this figure varies across the country.

Illustration 1: Nature parks in Germany, of which 56% are protected areas



Poland

Forest functions in Poland are divided into: production forests, protective forests and social forests. Production forests are maintained to ensure their sustainability for regular harvesting of timber and non-timber forest products, development of tourism, income from timber sales, and hunting services. Protective forests ensure the protection of biodiversity including a variety of habitats and certain flora and fauna species. Social forests focus mainly on recreational and health services to society.

In Poland 87% of forests are public property (of which 2% are 23 national parks); 13% is privately owned. Regarding state forests and National Parks harvesting operations are based on Forest Management Plans and their annual revisions (which are approved by the Ministry of Environment). A permission to harvest and sell wood is achieved through a few steps. Firstly, the annual inventory is approved. Secondly, field inspectors

(foresters) check the plans and issue an harvesting permit to contractors. Lastly, the harvested wood is marked by the foresters as legally harvested. Regarding private forests a permission to harvest is given either by a State Forest Officer (forester) or by a State Forest Authority.

The state foresters do not practice monoculture anymore, instead they adjust the species composition of stands to that occurring naturally in a particular area. Therefore the area of broadleaved stands in the State Forests increased from 13% to more than 28% in the years 1945-2014. The more plentiful tree species are oak, ash, maple, sycamore, elm, as also birch, beech, alder, poplar, hornbeam, aspen, linden and willow. Coniferous species however still cover most of the forest area. The main tree species of most coniferous forests is Scots pine (*Pinus sylvestris*).

Of Poland's approximately 9.6 million hectares of forest 7.6 million hectares are PEFC-certified and 7.2 million hectares are FSC-certified (2018). The entire Polish State Forest is PEFC-certified. 16 out of 17 Regional Directorates of State Forests (RDSF) are FSC certified and the last one is currently in the process of becoming certified.

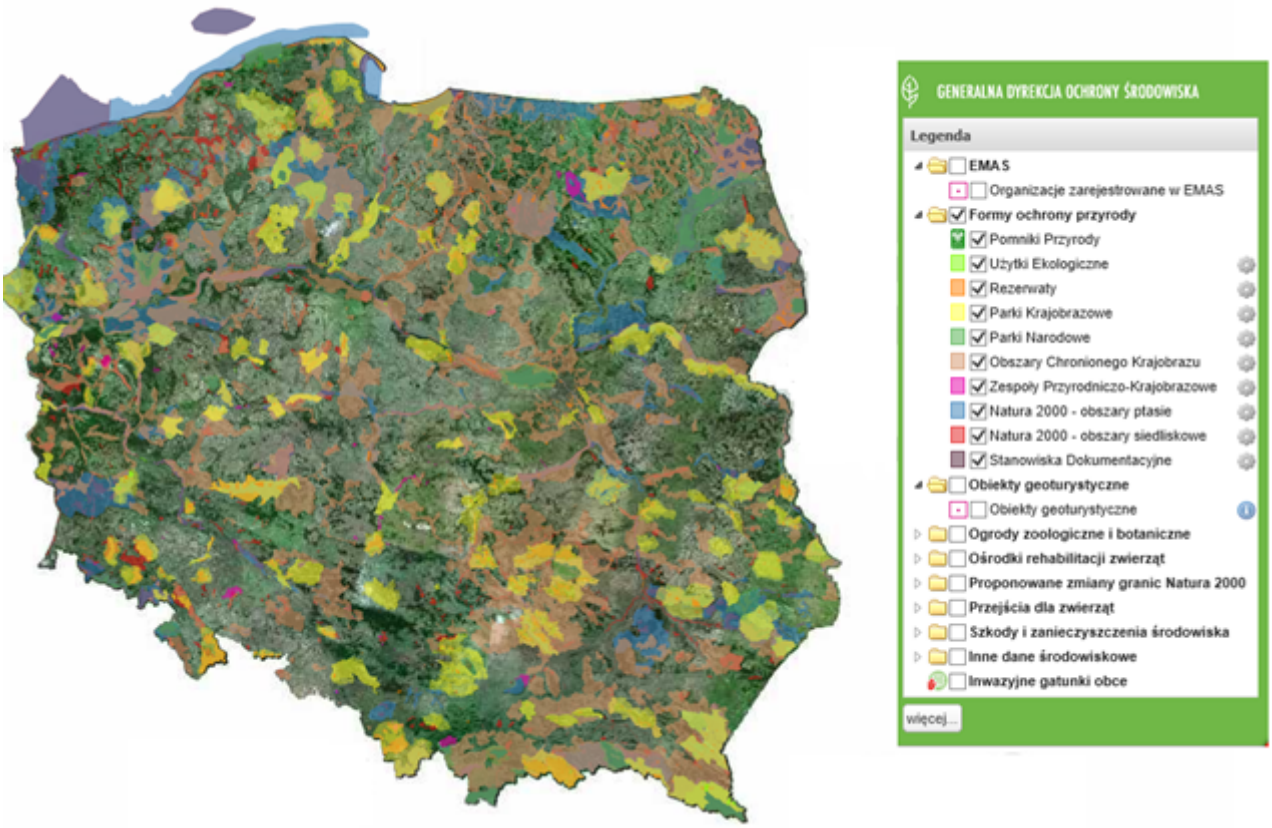
Over 30% of Poland is covered by forests. The FAO (2017) and FSC (2018) report a steady growth of forest area. Moreover wood stocks in the state forests have increased - 190 cubic meters/ha in 1991 against 254 cubic meters/ha in 2011. Forest stands of over 80 years old cover nearly 2 million hectares.

Forestry and the related industrial branches are important elements of the national economy. The State Forest Service gives employment to many people. It cooperates closely with local communities and non-governmental organizations. In recent years Polish State Forestry has achieved excellent economic results. Moreover for most stakeholders the non-production functions of the Polish forests are most important.

The State General Directorate for Environmental Protection (GDOS) (http://geoserwis.gdos.gov.pl) has on its website advanced geographic information on protected areas of Polnad including:

- *23 national parks and buffer zones;*
- *122 landscape parks and buffer zones;*
- *1498 nature reserves and buffer zones;*
- *402 protected landscape areas;*
- *260 nature and landscape complexes;*
- *174 documentation stands;*
- *138 SPAs (special protection areas designated under the Birds Directive 79/409/CEE);*
- *843 SACs (special areas of conservation designated under the Habitats Directive 92/43/CEE);*
- *7 overlapping areas (SPAs and SACs within common boundaries);*
- *16 Ramsar sites.*

Illustration 2: Different kinds of protected areas in Poland (interactive map of GDOS)



Czech Republic

The forest area in Czechia is 2.67 million hectares, which is 34.6% of the total land area in the country (FAO 2016). The forest area increased between 2010 and 2015 by 10,000 ha. More than one-third of Czech forests are under threat from the worst infestation of bark beetle in history.

61.5% of the whole forest area belongs to the state. The rest is distributed between municipalities (17%) and private owners (19%). Most of the state forests are administrated by “Lesy České republiky s.p.”, the rest by the Czech Army, by the Office of the President of the Republic and by National Parks Administration.

Forests in Czechia can be divited in 3 groups: Production Forests, Protection Forests and Special Purpose Forests. The Protective Forests category includes forests in exceptionally unfavorable locations for forest growth. In the Special Purpose Forests wood can also be harvested, but this are national parks, nature reserves, etc.

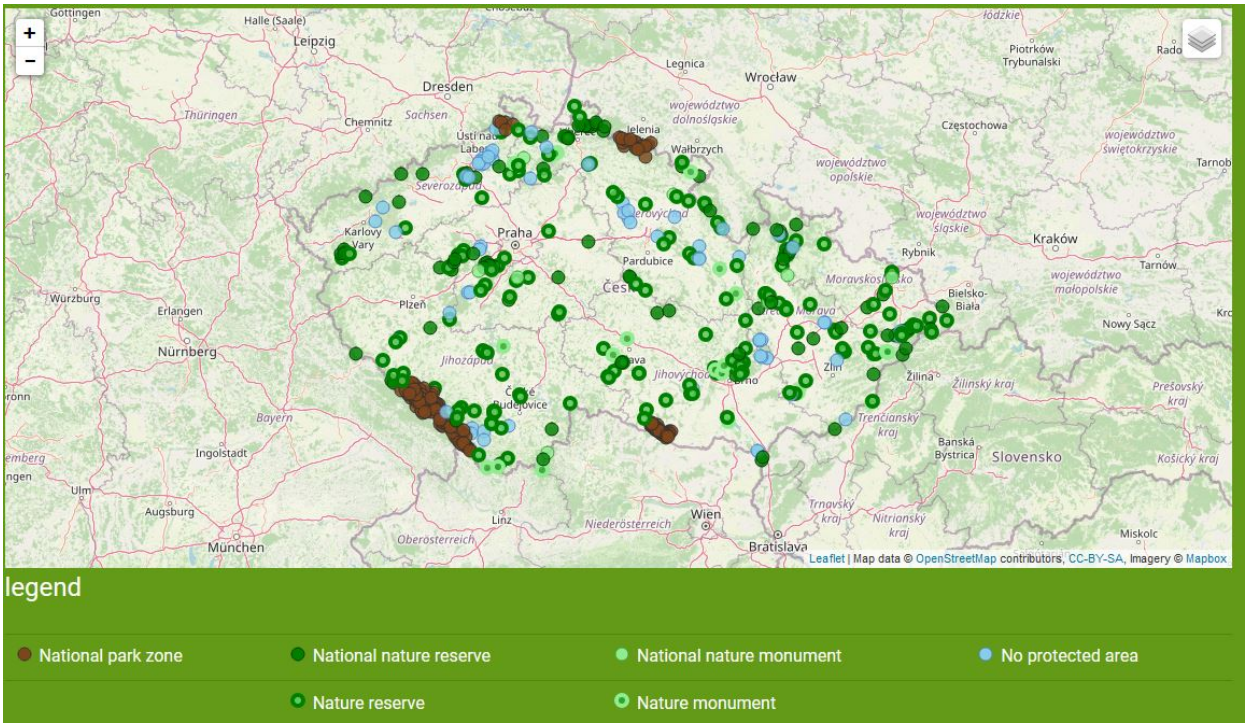
The current distribution of forests and tree species is mainly a result of forestry. The current share of conifers (72.5%) is more than twice as high as in natural forests. The proportion of deciduous trees is increasing, but is still far from its natural proportion. The dominant species are spruce – 54%, pine – 18%, oak – 6%; and beech – 5%.

Around 68% of the entire Czech forest area (1.8 milions ha) is PEFC certified. Only around 100,000 ha of this are accounted for by private forest owners, 165,000 ha by municipal forest owners and 1.5 million ha by state forests, which are thus certified.

0.09% of total forest area are old-growth forests, 0.28% are natural forests and 0.73% are near-natural forests. Most of them are located in national parks and protected areas which makes them more or less protected. Four National Parks cover 1.51% of the total area of Czechia, 26 Protected Landscape Areas (PLAs) cover 14.42%, and small-scale protected areas cover 1.40%. Natura 2000 areas cover 18.99%, with many overlapping with other protected areas.

Forest has increasingly become the important factor of socioeconomic development of Czech society. Besides timber production, multifunctional forest management also fulfils a wide range of other ecological and social functions for the benefit of general public. Forests also represent a significant component of integrated policy of rural development, mainly for their contribution to income and job opportunities in the areas with a high rate of unemployment. The significance of forests in the future will increase, not only because forests are the most important environmental element but also because they are a renewable source of high-quality wood, energy wood and other forest products.

Illustration 3: Natural forests in Czechia (source: www.naturalforests.cz)



5.3 Detailed description of Supply Base

Supply Base

a. Total Supply Base area (ha): 23.55 million ha
   - Forests in Germany: 11.42 million ha (2016)
   - Forests in Poland: 9.46 million (2016)

- Forests in Czech: 2.67 milion ha (2016)

b. Tenure by type (ha): 9.90 million ha privately owned; 13.65 million ha public
   - Forests in Germany: 7.64 million ha privately owned; 3.78 million ha public
   - Forests in Poland: 1.23 million ha privately owned; 8.23 million ha public
   - Forests in Czech: 1.03 milion ha privately owned; 1.64 milion ha public

c. Forest by type (ha): temperate forests

d. Forest by management type (ha): managed natural

e. Certified forest by scheme (ha): 8,240,596 ha of FSC, 19,536,541 ha PEFC
   - Forests in Germany: 1,353,829 ha of FSC (2019), 7,580,690 ha PEFC (2019)
   - Forests in Poland: 6,764,123 ha of FSC (2019), 7,155,851 ha PEFC (2019)
   - Forests in Czech: 122,644 ha of FSC (2020), 1,800,000 ha PEFC (2019)

Feedstock

f. Total volume of Feedstock: 0 – 200,000 tonnes*

g. Volume of primary feedstock: 0%

h. List percentage of primary feedstock (g), by the following categories.
   Subdivide by SBP-approved Forest Management Schemes:
   - 0% Certified to an SBP-approved Forest Management Scheme
   - 100% Not certified to an SBP-approved Forest Management Scheme

i. List all species in primary feedstock, including scientific name:
   - Pine species (*Pinus spp.*);
   - Spruce species (*Picea spp.*);
   - European species (*Larix spp.*);
   - Fir species (*Abies spp.*);
   - Douglas fir (*Pseudotsuga menziesii*).

j. Volume of primary feedstock from primary forest: None (0%)

k. List percentage of primary feedstock from primary forest (j), by the following categories.
   Subdivide by SBP-approved Forest Management Schemes:
   - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme
   - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme

   Not applicable

l. Volume of secondary feedstock: 100%*

Type \ Origin	Germany	Poland	Czechia
Chips	0%-19%	0%-19%	0%
Sawdust	0%-19%	60%-79%	0%-19%
Shavings	0%-19%	0%-19%	0%
Off-cuts	0%-19%	0%-19%	0%
Untreated small chips and dust	0%-19%	0%-19%	0%

m. Volume of tertiary feedstock: 0 tonnes (0%).

* As exact data differ every year and are considered confidential, ranges (bands) of feedstock amounts and percentages are presented.

5.4 Chain of Custody system

BP holds valid PEFC CoC certificate - PEFC/04-31-2318, https://pefc.de/einkaufsratgeber/unternehmen/1701 , using both PEFC percentage based method (Volume credits) and physical separation. The organization receives feedstock partly with PEFC claim and partly without any claim. Material which is not PEFC certified or PEFC controlled sources is not included in the BP's SBP biomass, but physically separated from SBP compliant/controlled feedstock. Separation is done via storing raw material on separate storage area and via different production cycle.

The physical separation is assured during the production and storage processes (both feedstock and biomass) by using compliant material for SBP pellets, and non-compliant material for premium pellets which are produced at different time.

The compliant and controlled feedstock is used in a credit system where the certified proportion is calculated using a production conversion factor and the share (%) of the certified material. Material with FSC claim will be included. The amount of SBP output is calculated from available credits in the credit system.

6 Evaluation process

6.1 Timing of evaluation activities

The on-site evaluation was conducted on the 01 and 14th of December 2020 (10.5 hours). Assessment activities included documents review at office, inspection of production facilities and staff interviews.

Activity	Location	Auditor(s)	Date/time
Tuesday 1th of December			
Opening meeting 1. Presentation of the organization and the processes in the pellet production 2. Non-conformites from last year 3. Updates in the Supply Base Report	Skype	MK	07.30-08.30
Monday 14th of December			
1. Evaluation of the material origin, CoC 2. Documented procedures (Management system), including procedures for: ○ Management review ○ SBR ○ Health and safety procedures and training	Office	MK	08:00-11.30
Interview with Purchasing department representative 1. Evaluation of incomming delivery notes and invoices 2. Critical control points of PEFC CoC	Purchasing department	MK	11:30-12:15
Lunch break			12:15-13:00
Review of the system for the collection and reporting of energy and emissions data • Reporting period • Transport data • Records of fuel use in production and storage • SAR	Office,	MK	13:00-14:00

Chain of custody review (site tour); 1. Interview with roundwood acceptance department 2. Production 3. Storage	Production and storage facilities Port storage facilities	MK	14:00 – 15:30
Interview with Sales department representative 1. Understanding of SBP sales process 2. Critical control points of PEFC CoC	Sales department	MK	15:30-16:30
Closing meeting*	Office,	MK	16:30 – 17:00
Estimated end of the evaluation			17:15

* It is expected that management will be present during opening and closing meeting.
NB! The presented agenda is evaluative and may change during the evaluation.

6.2 Description of evaluation activities

Composition of audit team:

Name	Qualification	Role/focus in evaluation
Michael Kutschke, Berlin, Germany	M.Sc. in Forestry. Michael is a chain of custody lead auditor in FSC and PEFC and FSC Forest Management lead auditor. Michael is a FSC Trademark expert and has experience from work with Legal Sources (EUTR) and SAN.	Lead auditor and responsible for all audit processes.

The audit was focused on management system evaluation: division of the responsibilities, documented management system, input material classification (reception and registration), analysis of the existing PEFC system and PEFC system control points as well as GHG data availability.

Description of the audit:

All SBP related documents connected to the SBP, as well as PEFC CoC system, was provided by the company prior to the audit. This including SBP and PEFC procedures, GHG data summaries and Supply Base Report. The audit started with an opening meeting attended by the SBP and purchase responsible persons.

The lead auditor introduced themselves and provided information about audit plan, methodology, auditor qualification, confidentiality, and clarified certification scope.

After this, the auditor went through all applicable requirements of the SBP standards no. 2, 4, 5 and related instruction documents covering input clarification, existing chain of custody system, management system, recordkeeping/mass balances, emission and energy data. Chain of Custody implementation was reviewed focusing in the Critical Control Points, in particular it was verified reception of the material and it's classification, identification of feedstock origin, production process with the conversion factors associated, mass balance, final product storage and sales. During the process, the overall responsible person for SBP system and other relevant staff were interviewed. The auditors also visited the pellet production facility, including goods reception and review of records, input of feedstock in production lines, separation system and other critical control points of the CoC system. Staff was also interviewed.

At the end of the audit, findings were summarised, and conclusions based on use of 3 angle evaluation method were provided to SBP responsible person during the closing meeting. Closing meeting was held on 21.10.2020.

6.3 Process for consultation with stakeholders

The Certification Body has conducted a stakeholder consultation by means of sending a stakeholder notification email to stakeholder organizations one month prior to the assessment audit date on October 17 2019. The notification encourages all stakeholders to forward any comments regarding harvesting practices, environmental performance and any other direct or indirect effect on stakeholders to organization and NEPCon.

No stakeholder consultation was undertaken before this annual audit.

7 Results

7.1 Main strengths and weaknesses

Strength: The BP has a small team of dedicated workers. The team has a good understanding of the SBP requirements. The BP has a strong supply system. It is also a very convenient location of the plant, since it is an established industrial area, where deliveries of material can be combined.

Weaknesses: -

7.2 Rigour of Supply Base Evaluation

Not applicable.

7.3 Collection and Communication of Data

The organization has had an energy engineer in the team who implemented the system for collection of the emission and energy data. The company supplied the auditor with actual data on Greenhouse Gas emissions where needed and has used default values where allowed. All data are well recorded and accessible

7.4 Competency of involved personnel

The organization has had an energy engineer in the team who implemented the system for collection of the emission and energy data. The company supplied the auditor with actual data on Greenhouse Gas emissions where needed and has used default values where allowed. All data are well recorded and accessible.

7.5 Stakeholder feedback

No stakeholder comments were received (see also section 6.3 above)

7.6 Preconditions

No open NCRs. There are no other pre-conditions open after this.

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 for this audit (supply base evaluation is not included in the certificate scope).

9 Review of Company's mitigation measures

Not aplicable

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 01/21	**NC Grading:** Minor
Standard & Requirement:	Standard #2 V1.0 - Verification of SBP-compliant feedstock - 2C - 4.1
Description of Non-conformance and Related Evidence:	
The organization has used the last SBR template. The SBR contains the most important features and all necessary details. During the review of SBR auditor identified that the share of roundwood used for biomass compared with the total harvested is missing for Germany, Poland and Czech republic. Therefore the auditor decided to raise a minor NCR.	
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:	*Click or tap here to enter description provided by Company to close the NC.*
Findings for Evaluation of Evidence:	*Click or tap here to enter findings for evaluation of evidence by the auditor.*
NC Status:	Open

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):	Pilar Gorría Serrano
Date of decision:	08/Feb/2021
Other comments:	*Click or tap here to enter text.*