



NEPCon Evaluation of Latgranula SIA Compliance with the SBP Framework: Public Summary Report

Main (Initial) 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

CB Name and contact:	NEPCon OÜ, Filosoofi 31, 50108 Tartu, Estonia
Primary contact for SBP:	Ondrej Tarabus otarabus@nepcon.org, +34 605 638 383
Current report completion date:	25/Jun/2020
Report authors:	Oļesja Puišo, Ēriks Līdemanis
Name of the Company:	Latgranula SIA, production address: Rupniecibas street 10, Incukalna district, Inčukalns, LV-2141, Latvia. Legal address: Rudolfa Blaumana 3a, Sigulda, LV-2150, Latvia
Company contact for SBP:	Ojārs Bēziņš; mob. +371 26549705; e-mail: ojars.berzins@latgranula.lv
Certified Supply Base:	sourcing from Republic Latvia and Estonia
SBP Certificate Code:	SBP-08-11
Date of certificate issue:	29/Jun/2020
Date of certificate expiry:	28/Jun/2025

This report relates to the Main (Initial) Audit

2 Scope of the evaluation and SBP certificate

Scope of certificate includes production of wood pellets for use in energy production and its transportation by different means of transport to different end points in Latvia. The scope of the certificate does not include Supply Base Evaluation. The scope of the certificate includes communication of Dynamic Batch Sustainability Data.

The certificate scope covers the production site and office of the organization – Biomass producer SIA Latgranula in Inčukalns.

The Organisation holds a valid FSC Chain of Custody certificate NC-COC-060189, covering procurement of raw material, production of heating pellets and its sales.

The organisation is using only tertiary feedstock for biomass production: wood industry residues – dry sawdust and shavings are sourced from small number of suppliers – small and medium sized secondary producers situated in Latvia. No biomass drying is taking place.

For producing SBP-Compliant production the BP is using FSC certified and FSC Controlled Wood inputs within the FSC credit system. In addition to this non-certified inputs are segregated and processed separately. The origin of feedstock used for biomass production is Latvia and Estonia.

3 Specific objective

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

The scope of the evaluation covered:

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

BP is a pellet producing company located in Incukalna, Latvia. The designed production capacity of pellet plant is expected to be 34000 tones.

Dry sawdust as well as shavings are used in pellet production. No biomass drying process is taking place.

The tertiary feedstock used for pellet production originates from Latvia and Estonia and is both FSC certified and non FSC certified.

The BP implements FSC credit system and produced biomass will be sold with FSC Mix credit claim or as non-certified. From non-certified feedstock, the BP is producing premium grade pellets and briquettes, whereas FSC certified feedstock is used for producing of FSC certified production – industrial pellets.

The biomass is expected to be transported by trucks to different ports in Riga (DAP) as well as sold at factory gate (EXW/ FCA).

Pellet plant was commissioned in 1998.

5.2 Description of Company's Supply Base

The BP is sourcing tertiary feedstock – sawdust and shavings. The origin of feedstock is Latvia and Estonia. Forests within the Supply Base are temperate and hemi-boreal. The dominating species are pine and spruce. Other main wood species growing in the supply base area are: birch, alder, ash, aspen, oak.

5.2.1 Latvia:

3.2 million ha of forest, agricultural lands 1,87 million ha. Forest covered area of Latvia amounts to 51%.

The area covered by forest is increasing. The expansion happens both naturally and by afforestation of infertile land unsuitable for agriculture.

Forests lands consists 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 7.4%, aspen 5.4%, black alder 3%, ash 0.5% and oak 0.3% .

46.3% of whole forest area is owned by state, other 53.7 are private forests and other forest ownership types. Management of the state-owned forests is performed by the public limited company 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 highly endangered species and biotopes located without the designated protected areas, if a functional zone does not provide that, micro reserves are established. According to data of the State Forest Service (2015), the total area of micro reserves is 40 595 ha. Identification and protection planning of biologically valuable forest stands is carried out continuously.

On the other hand, for preservation of biological diversity during forest management activities, general nature protection requirements binding to all forest managers have been developed. They stipulate that at felling selected old and large trees, dead wood, undergrowth trees and shrubs, land cover around micro-depressions are to be preserved, thus providing habitat for many organisms.

Latvia has been a signatory of the CITES Convention since 1997. CITES requirements are respected in forest management, although there are no species included in the CITES lists in Latvia.

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 Conservation Agency 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, wood-working industry and furniture production amounted to 6 % GDP in 2012, while export yielded 1.7 billion euro (17 % of the total amount).

Latvian State forests are FSC (50%) and PEFC certified (100%). Small forest groups of FSC forest owners exist in Latvia. Total FSC certified area is estimated ca 30%. PEFC certified area is appr. 60% of the total forest area.

5.2.2 Estonia

The forest is defined in the Forest Act. There are three main forest categories described in this legislation: commercial forests, protection forests and protected forests. According to the ownership, forests are also divided into private forests, municipality forests and state owned forests. The state owned forest represent approximately 40% of the total forest area³ and are certified according to FSC and PEFC forest management and chain of custody standards in which the indicators related to forest management planning, maps and availability of forest inventory records are being constantly evaluated and addressed⁴. The state forest is managed by State Forest Management Centre (RMK) which is a profit-making state agency founded on the basis of the Forest Act and its main duty lies in a sustainable and efficient management of state forest.

Currently more than 2 230 000 ha, equal to 51% of the Estonian land territory, is covered by forest as indicated in Figure 1 and the share of forest land is growing. According to FAO data, during 2000 - 2005,

average annual change in the forest cover was +0.4 %⁵. Forestry Development Plan 2012-2020 and Yearbook Forest 2014, that gives annual reports and facts about the forest in Estonia, state that during last decade the cutting rate in Estonian forests is from 7 to 11 mill m3 per year⁶. The amount is in line with sustainable development principle when the cutting rate doesn't exceed the annual increment and gives the potential to meet the long-term economic, social and environmental needs. According to the Forestry Development Plan 2012-2020 the sustainable cutting rate is 12-15 mil ha per year.

For logging in any type of forest, it is required that a valid forest inventory or forest management plan, along with a felling permit issued by the Environmental Board, is available. All issued felling permits and forest inventory data is available in the public forest registry online database⁷.

Area of protected forests accounts for 25.3% of the total forest area whereas 10% is considered to be under strict protection. The majority of protected forests are located on state property. The main regulation governing the preservation of biodiversity and the sustainable use of natural resources is the Nature Conservation Act⁸. Estonia has signed the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in 1992⁹ and joined the International Union for Conservation of Nature (IUCN) in 2007¹⁰. There are no CITES or IUCN protected tree species naturally growing in Estonia.

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

More detailed information about each supply base region (general description of the forest resources and forest management practices within the Supply Base) is publicly available at the SBP homepage: <https://sbp-cert.org/accreditations-and-certifications/certificate-holders/>

5.3 Detailed description of Supply Base

Total Supply Base area (ha): 5.642 million. ha

Tenure by type (ha): 3.01 million ha in state ownership, 2.63 million ha private owned.

Forest by type (ha): 59% hemi-boreal forest according to FSC classification, 41% temperate forests

Forest by management type (ha): 5.28 million ha managed, semi-natural forests

Certified forest by scheme (ha): PEFC, total certified area 2.95 million ha for Latvia and Estonia, 2.620 million ha – FSC forest management scheme

Quantitative description of the Supply Base can be found in the Biomass Producer's Public Summary Report, published in the SBP website.

5.4 Chain of Custody system

The Organisation holds a valid FSC chain of custody (COC) certificate NC-COC-060189, covering procurement of raw material, production of heating pellets and its sales. There are FSC procedures in place including the description of the FSC/SBP systems implemented and other documents.

The organisation is using only tertiary feedstock for biomass production: wood industry residues – sawdust and shavings that is sourced from small number of suppliers – small and medium sized sawmills in the region. No biomass drying is taking place.

For producing SBP-Compliant production the BP is using FSC credit system. In addition to this, non-certified inputs are segregated and processed separately. From non-certified feedstock the BP is producing premium grade pellets and briquettes, whereas FSC certified feedstock is used for producing of FSC certified production – industrial pellets.

6 Evaluation process

6.1 Timing of evaluation activities

Onsite assessment was conducted on May 15, 2020 and May 27, 2020 (appr. 7 hours), remote audit covering both BP and outsourced production was conducted at May 18, 2020 (5h x 2 auditors), Additional time was spend for the document review and evaluation at May 15, 2020 (2h x 2 auditors).

In total 2,5 auditor days were spent for the assessment audit.

Assessment activities included documents review at office, inspection of production facilities and staff interviews.

Activity	Location	Auditors	Date/time
Short opening meeting, CoC evaluation, evaluation of the CCP, roundtrip around the production facilities, interview of the production staff	Latgranula production site	ELI	15/05/2020 10.00-13:30
Opening meeting	Skype	OP, ELI	18/05/2020 10.00-12.00
Documents and procedures review (feedstock inputs, SBR, CoC control system and critical points, sales, compliance with legal requirements, staff interview.	Skype	OP, ELI	18/05/2020 13.00-16:00
Documents and procedures review (SAR and energy use energy data), staff interview	Office	ELI	27/05/2020 09:30-12:30
Closing meeting	Office	OP,ELI	27/05/2020 12.30-13.00

6.2 Description of evaluation activities

Composition of audit team:

Auditor(s), roles	Qualifications
Oļesja Puišo, Riga, Latvia Lead Auditor evaluation against standards 2 and 4	Audit team leader. Oļesja has passed CoC/ FM lead auditor training, PEFC CoC, ISO 140001, SAN and Legal Source training courses. Previous experience in woodworking industry as well as many years of experience within CoC auditing. She has passed the SBP lead auditor training and has participated on several SBP assessments.
Eriks Lidemanis Lead Auditor evaluation against standard 5	Audit team member. Joined NEPCon in 2017. Holds bachelor's degree from Latvia University of Agriculture Forest Faculty (forest management). Previous work experience in wood processing industry and roundwood measurement. Ēriks has passed the NEPCon lead assessor training course in FSC Chain of Custody and FSC FM operations and obtained the FSC CoC/FM auditor qualification. And has participated in FM audits in Latvia, Lithuania and Russia. Successfully obtained SBP auditor qualification in 2019 and participated in SBP audits in Latvia

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

Description of the audit evaluation:

All SBP related documentation connected to the SBP as well as FSC CoC system of the organisation, including SBP Procedure, SAR and GHG data calculations, Supply Base Report and FSC system description was provided by the company in the prior to the assessment, which started with an opening meeting attended by the representative of the BP.

Audit team leader introduced the audit team, provided information about audit plan, methodology, auditors qualification, confidentiality issues, and assessment methodology and clarified certification scope.

After that auditors went through all applicable requirements of the SBP standards nr. 2, 4, 5 covering input clarification, CCP on production, existing chain of custody system, management system, CoC, recordkeeping requirements, emission categorisation of input and verification of SBP-compliant biomass. During the process, overall responsible person for SBP as well as outsourced production staff was interviewed.

Field visit of the production was taken place at 15.05.2020 and 27.05.2020. During the visit a roundtrip around pellet production mill was undertaken, documents(SAR, procedures) and records were reviewed. During the site tour, applicable records were reviewed, staff was interviewed and FSC system critical control points were analysed.

At the end of the audit, findings were summarised, and audit conclusions based on use of 3 angle evaluation method were provided to the management and SBP responsible person.

Impartiality commitment: NEPCon commits to using impartial auditors and our clients are encouraged to inform NEPCon management if violations of this are noted. Please see our Impartiality Policy here: <http://www.nepcon.org/impartiality-policy>

6.3 Process for consultation with stakeholders

The stakeholder consultation was carried out on March 25, 2020 by sending direct email to different stakeholder categories. In total representatives of 45 stakeholders has been notified. The stakeholder structure according to type is as following: authorities and forestry and nature protection supervising institutions (35%), timber industry and nature conservation associations (30%), non-governmental organizations (20%), academia and scientific institutions (8%); and 6% - FSC national/regional representative, forest managers and other organizations. No comments from the stakeholders have been received.

7 Results

7.1 Main strengths and weaknesses

Strengths: Small number of the management staff, BP is EN+ certified and GHG data collection is set.

Weaknesses: See in the NCR section of the report.

7.2 Rigour of Supply Base Evaluation

Not applicable

7.3 Collection and Communication of Data

The organization has compiled emission data in the SBP Energy and GHG report (SAR) as a part of preparation process for the SBP assessment. The data had been provided prior to the assessment audit and verified and validated at the time of audit.

The following energy sources are used by BP: electricity for pellet production; diesel for feedstock handling, shipping and for biomass transportation to customer.

7.4 Competency of involved personnel

Overall, BP staff showed satisfactory understanding and knowledge of all applicable SBP requirements. The following key staff members are involved to SBP certification: SBP related staff responsibilities are presented in Section 4. "Responsibilities.." of the SBP Procedure. Generally, very few staff members are involved into SBP certification: SBP responsible/ Board Member (maintaining of the management system, staff training, volume recording, trademark use, feedstock delivery coordination), operators and shift lead (production process), accountant (incoming data recordkeeping). Prior SBP assessment, BP was supported by external consultant.

7.5 Stakeholder feedback

No feedback from stakeholders have been received prior, during and after this assessment.

7.6 Preconditions

One precondition was identified and closed by the organization before completing of the assessment report.

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.

N/A- SBE is not included in the certificate scop.

9 Review of Company's mitigation measures

N/A- SBE is not included in the certificate 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.

NC number 01/20	NC Grading: Major
Standard & Requirement:	<i>Standard #2: Verification of SBP-compliant feedstock. Instruction document 2C 4.1. The report shall be concise, covering the most important features, and shall be completed using the latest versions of the SBR Template for Biomass Producers downloaded from the SBP website</i>
Description of Non-conformance and Related Evidence:	
The Supply Base Report meets the minimum requirements of SBP: covering relevant data and is completed by using the latest version of the SBR Template for Biomass producers. Upon reviewing of Supply Base Report few deficiencies were identified: 1) Estonia is not mentioned as a supply region; section 2.3. of the report cover misleading information about the volume of certified feedstock used and received; 3) section 2.5. does not cover information about area of Estonia	
Timeline for Conformance:	Prior to (re)certification
Evidence Provided by Company to close NC:	Updated SBRs
Findings for Evaluation of Evidence:	Prior finalization of report the BP have corrected SBR. Review of reports confirmed that they concise and cover the most important features.
NC Status:	Closed

NC number 02/20	NC Grading: Minor
Standard & Requirement:	SBP Standard #2, p.15.3. The BP management system shall document all necessary procedures (15.3)
Description of Non-conformance and Related Evidence:	
All necessary procedures are documented. See Exhibits to this report. Most relevant SBP and Chain of Custody related processes are covered in the documented procedures: SBP procedure. Other SBP	

<p>related documents (Product Group Schedule, Supply Base Report, SBP Report on Energy and GHG data as well as other documents and records) required by SBP standards have been prepared by the BP and made available to auditors during the on-site assessment audit. Review of documented procedures show that procedures indicated number of gaps, including reference to FOB not covered in SAR report (p.2.3. page 1; p.12.9 page 8), reference to outdated weblinks and wrong SBP contact persons (p.3.2. page 1; p.9, page 6; p.10.1.6 page 7; p.13.2 page 8), reference to FSC transfer system (p.6.2. page 3), reference to documents does not exist such as anticorruption policy (p.15 page9). Minor NCR 02/120 is issued.</p>	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	
Findings for Evaluation of Evidence:	
NC Status:	Open

NC number 03/20	NC Grading: Minor
Standard & Requirement:	SBP Standard #5, Instruction document 5E, p. 3.1.9 3.1.9 An 'SBP Report on Energy and Carbon (SREG) for Supplied Biomass for inland transport shall always be completed by BPs and Traders where biomass is supplied using inland transport outside the scope of a Static Data Identifier (SDI). (5E 3.1.9)
Description of Non-conformance and Related Evidence:	
The responsible person is aware in which case SREG needs to be produced, but the requirement is not explicitly contained in the documented procedures of the organization.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	
Findings for Evaluation of Evidence:	
NC Status:	Open

NC number 04/20	NC Grading: Minor
Standard & Requirement:	Instruction 5E 6.2.2 The BP must inform its CB when a significant change in the operations occurs, resulting in a variation of electricity use or fossil fuel use greater than 25%. In that case, a new audit shall be required as

	<p>soon as stable operations have been reached during three (3) consecutive months after the change has occurred.</p> <p>Examples may result from a change of production process, a plant refurbishment after an incident, a major change in feedstock used (e.g. use of logs instead of saw mill residues), change of fuel for drying (e.g. fossil fuel instead of biomass) etc</p>
Description of Non-conformance and Related Evidence:	
<p>Interview during the audit shows that BP is aware of the requirement to inform the CB in case of significant changes in the operation, but there are no requirement in SBP procedure to inform CB when a significant change in the operations occurs, resulting in a variation of electricity use or fossil fuel use greater than 25%.</p>	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	
Findings for Evaluation of Evidence:	
NC Status:	Open

OBS 01/20	Standard & Requirement:	<p>SBP Standard #2, p. 6.3</p> <p>1.4 The BP shall ensure that the place of harvesting is within the defined SB. (6.3):</p> <p>Note: 'Place of harvesting' in the standard means the place of growth of the feedstock, i.e. the location of the tree stump</p>
Description of findings leading to observation:	<p>In order to ensure the place of harvesting is within the defined Supply Base, the BP will validate the timber origin in the supplier agreement. In order to implement this, the BP will complement the existing supply contracts with requirement allowing the BP to conduct a supplier verification audit. See the requirement (section 8) in documented procedures of the organization. (see Exhibit 1).</p> <p>In addition to this, according to documented procedures, the BP shall review timber origin documents based on sampling during the on-site audits to suppliers, confirming that "place of harvesting" is within the designated Supply Base.</p> <p>According to information from the responsible person, until the assessment audit the BP had not carried out actions to make sure the feedstock origin is within the defined supply base and the BP had made decisions on the supply base based on information from suppliers. Auditors decided to raise an observation OBS 01/20 due to non-confirmed information on the feedstock supply base and missing provisions in feedstock supply contracts allowing the BP to conduct audits with purpose to verify the feedstock origin.</p>	
Observation:	The BP should ensure that the place of harvesting is within the defined SB.	

OBS 02/20	Standard & Requirement:	<p>SBP Standard #5, Instruction document 5E, p. 6.10.3</p> <p>To determine the effective load in metric tonnes per vehicle: in the case of trucks, the weight should be measured by a weighbridge, or equivalent, and recorded in a control system.</p> <p>Note: For transport by truck, train or flatboat the most important parameters are the distance and the capacity of the vehicle. It is usually enough to make a good estimate of the transport energy, based on proposed references by JRC and BioGrace. There is the option to record fuel use for transport, but this is not mandatory. For (long distance) sea transport fuel usage data must be provided. (5E, 6.10.3)</p>
Description of findings leading to observation:	All feedstock is received and accounted in volume units. For volume-mass conversions the BP uses data obtained during the last month period weighbridge data, but measurements are based on sampling.	
Observation:	To determine the effective load in metric tonnes per vehicle: in the case of trucks, the weight should be measured by a weighbridge, or equivalent, and recorded in a control system.	

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):	Ondrej Tarabus
Date of decision:	25/Jun/2020
Other comments:	<i>Click or tap here to enter text.</i>