



# Forest Certification LLC Evaluation of MAGISTRAL TRANSIT LLC 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](http://www.sbp-cert.org)*

## *Document history*

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# 1 Overview

CB Name and contact: Forest Certification LLC, 121096, Russia, Moscow, Vasilisy Kozhinoy, bld. 1, office 17

Primary contact for SBP: Director of certification programs Savulidi Alexey. Phone/fax +7 (812) 384-69-88. Mobile phone +7 (911) 921-74-65. E-mail: Alexey.Savulidi@fcert.ru

Current report completion date: 17/Oct/2020

Report authors: Stashkevich Nikolai

Name of the Company: MAGISTRAL TRANSIT LLC: 666534, Russian Federation, Irkutsk region, Kazachinsko-Lensky district, Ulkan, Zheleznodorozhnyya Str., 1

Company contact for SBP: Aspaturyan Svetlana Igorevna, e-mail: otde165@yandex.ru, tel.: 8 (395-62) 4-17-48

Certified Supply Base: Russia, Irkutsk region

SBP Certificate Code: SBP-09-02

Date of certificate issue: 20/Oct/2020

Date of certificate expiry: 19/Oct/2025

This report relates to the Main (Initial) Audit

## 2 Scope of the evaluation and SBP certificate

The certificate scope covers the office and production site in Ulkan, the Irkutsk region, Russia.

Scope description: Production of wood pellets in Ulkan, Irkutsk region, Russia, for use in energy production. Post production end points – BP's factory gate and Russian's seaports of New Port, Nakhodka, Vladivostok. The scope of the certificate does not include Supply Base Evaluation. The scope of the certificate includes communication of Dynamic Batch Sustainability Data.

### 3 Specific objective

The specific objective of this evaluation was to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of 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
- Assess compliance against Instruction Document 5E: Collection and Communication of Energy and Carbon Data (Version 1.1 November 2019)

## 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

MAGISTRAL TRANSIT LLC was registered 15 February 2007.

The main activities of the enterprise are logging, sawing and planing of wood.

The address of the enterprise: 666504, Irkutsk region, Kazachinsko-Lensky district, settlement Magistralny, Rossiyskaya str., Building 2B, office 6. The production site of the enterprise (the warehouse) is located 666535, Irkutsk region, Kazachinsko-Lensky district, Ulkan village, st. Railway, 1.

In accordance with the lease contracts, Magistral-Tranzit harvests timber at 5 FMUs.

The technological process of Magistral-Transit LLC has the following stages and allows to carry out the following operations:

- 1) harvesting and removal of wood,
- 2) production and shipment of round timber.
- 3) production and shipment of lumber.
- 4) production and shipment of planed products.
- 5) production and shipment of briquettes from sawdust and pellets. At the time of the audit, the enterprise was producing only trial lots of pellets.

Company has valid FSC-certificates: FC-FM/COC-643541 and FC-COC-643543.

Pellet plant was commissioned in June 2020.

The incoming raw material for the production of pellets is a mixture of sawdust and chips from own sawmill (production of lumber from roundwood harvested in leased FSC-certified FMUs). There is no procurement of other certified raw materials and it is not planned. Non-certified round wood is processed in a separate workshop; waste from their sawmilling does not go to the production of pellets, but is used for own boiler house. The company uses a transfer control system. There is a physical separation of certified and non-certified raw materials; separate accounting of materials is maintained. All pellets will have the FSC 100% claim, since all incoming raw materials are in the same material category (FSC 100%).

A shunting diesel locomotive is used to move wagon trains at the production site of Magistral-Transit LLC.

Big bags loaded in wagons are transported to Ulkan station, from where they are delivered by rail to the ports: New Port, Nakhodka and Vladivostok.

## 5.2 Description of Company's Supply Base

Magistral-Transit Limited Liability Company (Magistral-Transit LLC) is a large logging company in the Irkutsk Region. The resource base of the enterprise is the forest fund area of its own rental base in the Irkutsk region. The volume of the forest fund is 263899 ha. The company has an FSC forest management certificate (FC-FM/COC-643541). Magistral-Transit LLC carries out a full cycle of wood processing, from timber harvesting to shipment of finished products to end customers.

From leased forest areas, round timber is delivered for processing to a production site located in the Ulkan of the Kazachinsko-Lena district of the Irkutsk region. For the production of pellets, the company uses sawmill waste from its own sawmill (the mix of wood chips and sawdust) – FSC 100% secondary raw materials.



The Irkutsk region has one of the richest forest resources among the regions of Russia. Forests in the Irkutsk region occupy 71.5 million hectares, or 92% of its territory. The forest covers of the region is 82.6%. The lands of the forest fund occupy 69.4 million hectares. The total timber stock of the Irkutsk region is 8.8 billion m<sup>3</sup>, including the coniferous forest stock - 7.5 billion m<sup>3</sup>.

In accordance with the legislation of the Russian Federation, all the lands of the forest fund are owned by the state. Legal entities receive forest land for lease for a period from 10 to 49 years (with the right to extend the lease). Long-term rental relations are the dominant legal form for obtaining the right to harvest timber. The conclusion of lease agreements for forest plots or agreements for forest stands transactions are carried out at auctions for the sale of the right to conclude such agreements.

The Lands that are leased must necessarily go through state cadastral registration.

The Forest Code of the Russian Federation obliges each tenant to develop a forest development plan for 10 years (based on taxation and forest management), implement measures for the conservation, protection and reproduction of forests, submit a forest declaration and make additions on how they plan to use the forest sources in the given period of time. Once a quarter, tenants are required to compile reports containing information on the measures taken to secure, protect and reproduce forests and volumes of felling for the calendar year with a cumulative total.

Forest management practices are based on the achievement of renewable sustainable forest management in accordance with the requirements of forest legislation and the principles of forest certification. The rotation period of the felling is 60-120 years. Harvesting is carried out by clear cutting at the maturity stage with subsequent reforestation. Sanitary felling is also possible. Planting saplings, seedlings or natural regeneration can be used for reforestation. Ensuring high-quality reproduction of forest resources and protective forestation is an obligatory condition for forest user, which implies the forest development projects that are to improve the quality of the forest area usage, pinpoint of which is limitless and sustainable characteristics.

The composition of the forests of the Irkutsk region: Scots Pine (*Pinus sylvestris*), Siberian larch (*Larix sibirica*), Siberian pine (*Pinus sibirica*), Siberian spruce (*Picea obovata*), Siberian fir (*Abies sibirica*), saggy birch (*Betula pendula*), aspen (*Populus tremula*), and tree-shaped willow (*Salix spp.*)

According to the forest legislation during the wood harvest, specimens listed in the Red Book, as well as their habitat, are subject to conservation. Felling of valuable, endangered and specially protected tree species is prohibited. Plantations with a predominance of Siberian cedar pine (*Pinus sibirica* Du Tour.) are prohibited for felling.

Magistral-Transit LLC does not procure or purchase tree species listed in the Red Book or CITES list.

Within the resource base of the enterprise, high conservation value forests (HCVF) have been identified, Magistral-Transit LLC complies with a moratorium on timber harvesting in these forest areas.

Within one of the forest areas leased by Magistral-Transit LLC, intact forest territories are found. The company concluded an agreement on the conservation of high conservation value forests with the need of protection.

## 5.3 Detailed description of Supply Base

Total Supply Base area (ha): 263 899 (lease areas of MAGISTRAL TRANZIT LLC)  
Tenure by type (ha): state owned 263 899  
Forest by type (ha): boreal 263 899  
Forest by management type (ha): managed natural 263 899  
Certified forest by scheme (ha): 263 899 of FSC certified forest

Detailed information about BP's supply base may be found in their forest management plan available on the official website: <http://magistral.ru/>. The applicant for the certificate also posted his SBR on the official website

## 5.4 Chain of Custody system

The BP holds valid FSC Forest Management and Chain of Custody certificates: FC-FM/COC-643541 and FC-COC-643543.

<https://info.fsc.org/details.php?id=a02f300000gHgfMAAS&type=certificate>

<https://info.fsc.org/details.php?id=a02f300000gHimkAAC&type=certificate>

Magistral-Transit LLC declared the use as input raw materials only waste of its own sawmill production (a mixture of sawdust and chips), which is processing round timber from its own FSC-certified leased forest areas (raw material category – FSC 100%). Non-certified timber is allowed for sawing only in the second workshop, geographically distant from the first. Waste from the second workshop goes to its own boiler house. Thus, the operation of the declared transfer control system of applications is ensured.

Certified waste from the storage pockets is transported by own transport to the pellet production shop. Those responsible at the site (operators and senior operators of an automatic line for the pellet production) keep primary records of incoming raw materials, after which the information is summarized in the form of summary tables.

At the time of the current audit, the production of pellets is not included in the scope of the supply chain certificate (only trial batches of pellets have been released), but with regard to raw materials for the production of pellets (2 FSC COC audits for 2019 and 2020 were passed without conditions), the control of risk of entering the non-compliant raw materials and the competence of responsible employees can be confirmed

## 6 Evaluation process

### 6.1 Timing of evaluation activities

Onsite main assessment was conducted on 15-16.10.2020 (12 h). Assessment activities included documents review at office, inspection of production facilities and staff interviews.

<i>Date</i>	<i>Activities*</i>	<i>Location</i>
15.10.2020	<ul style="list-style-type: none"> <li>• Opening meeting.</li> <li>• Interviews with management and leading specialists of the enterprise.</li> <li>• Analysis of the resource base report.</li> <li>• Analysis of the internal documentation of the enterprise developed as part of the SBP certification.</li> <li>• Visit to the production site of the enterprise, places of acceptance, storage, processing of incoming raw materials and manufactured products.</li> </ul>	Office, production site
16.10.2020	<ul style="list-style-type: none"> <li>• Validation of an SBP enterprise supply chain system.</li> <li>• Interviews with employees.</li> <li>• Work with enterprise documentation. Fill out a checklist for applicable SBP certification standards.</li> <li>• Validation of the collection of SBP data on GHG, energy, carbon and stability characteristics.</li> <li>• Preparation of preliminary audit findings.</li> <li>• Closing meeting. Summing up the preliminary results of the audit.</li> </ul>	

\*Prior to onsite visit, detailed desk verification of documents has been implemented (3 h).

### 6.2 Description of evaluation activities

Composition of audit team:

Auditor(s), role	Qualifications
Stashkevich Nikolai, audit team leader	Forest Certification SBP lead auditor. He has successfully passed SBP auditor training in Berlin on 3-4 September 2019. Auditor had more than 100 audit-days in each of last years (2016-2019) on FSC and PEFC lead auditor.

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 prior to the assessment and lead auditor had enough time to review it and get well prepared for onsite visit. Assessment started with an opening meeting attended by the representatives from Organisation's management and staff.

Auditor introduced himself, provided information about audit plan, methodology, auditor qualification, confidentiality issues, and assessment methodology and clarified certification scope. During the opening meeting the auditor explained CB's approval related issues.

After that auditor went through all applicable requirements of the SBP standards nr. 2, 4, 5 and instruction document 5e covering input clarification, existing chain of custody system, management system, CoC, recordkeeping/mass balance requirements, emission and energy data and categorisation of input and

verification of SBP-compliant biomass. During the process, overall responsible person for SBP system and other staff were interviewed.

After a roundtrip around BP's pellet production was undertaken. During the site tour, applicable records were reviewed, staff was interviewed and FSC system critical control points were analysed.

At the end of the assessment findings were summarised and assessment were provided to the management and SBP responsible person.

## 6.3 Process for consultation with stakeholders

09/09/2020 the information letter (e-mail) was sent to the stakeholders. More than 8 stakeholders was informed about the assessment. No comments from stakeholders have been received. List of informed stakeholders includes such groups of stakeholders as of FSC Russua, indigenous peoples' communities, state forestry authorities, etc.

# 7 Results

## 7.1 Main strengths and weaknesses

Strength: All certified raw materials for the production of pellets SBP at the time of the assessment come from own production site. The transfer system with a single material category (FSC 100%) with proper control allows to avoid uncertified material entering the chain of custody (uncertified mix of chips and sawdust goes to own boiler).

Weaknesses: lack of stable production (calculation by trial lots) and inattention in preparing SBP-documents.

## 7.2 Rigour of Supply Base Evaluation

Not applicable

## 7.3 Collection and Communication of Data

The following energy sources are used by BP: electricity for pellet production; diesel for feedstock delivery, handling and pellet transportation to the Ulkan (nearest rail station); biomass fuel (saw mill residues) for burner (for drying). Diesel consumption is recorded in the summary excel-file, which takes into account the machines used, the start, end and duration of the shift, fuel consumption, mileage and operating time with the engine on. The electricity consumption was substantiated by the data of the electricity metering at the enterprise (pellet production shop) for 2020; the document was signed by the chief power engineer. Data on burnt biomass volumes are recorded in accounting for incoming raw materials - primary records were demonstrated, as well as a summary table for the reporting period.

## 7.4 Competency of involved personnel

BP staff showed good understanding of knowledge of all applicable SBP requirements. The following key staff members are involved to SBP certification:

- SBP responsible (certification engineer). He is responsible for checking procedures, documents, incl. for sales and purchases, for organizing the complaints process, calculating energy consumption based on actual indicators, providing data to the certification body.
- the procedure within the framework of their duties is guided by: the head of the pellet production shop, the chief power engineer, operators and senior operators of an automatic line for the pellet production, the laboratory assistant for finished products, a dispatcher for GPS equipment for monitoring equipment operation, a sales accountant, an accountant of a material group, warehouse manager for finished products, declarant.

According to the corresponding Training seminar protocol, SBP-training (on the content of the SBP-Manual) was provided by certification engineer and head of the pellet production shop. The date of seminar was 03-07-2020.

All interviewed personnel was competent.

## 7.5 Stakeholder feedback

No comments received from stakeholders prior to, during or after this assessment.

## 7.6 Preconditions

None

# 8 Review of Company's Risk Assessments

Not applicable

## 9 Review of Company's mitigation measures

Not applicable



## 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	NC Grading: Minor
<b>Standard &amp; Requirement:</b>	SBP Framework Standard 5: Collection and Communication of Data, V.1.0, March 2015; p. 5.1  All data submissions must be supported by appropriate evidence.
<b>Description of Non-conformance and Related Evidence:</b>	
The applicant for the certificate has developed SBP Audit Report (SAR) on Energy and Carbon Data for Pellets and Supply Base Report: LLC MAGISTRAL TRANSIT (SBR; in Russian and English versions), containing data on the raw materials used, manufactured products and energy consumption. When interviewing the employee responsible for SBP certification, he justified the values presented in the documents, provided the relevant evidence, except for the following: - no relevant evidence of the Design capacity and Average lower heating value specified in section 3.1 SAR was provided; - the electricity consumption indicated in section 3.2 SAR, was substantiated by the data of the electricity metering at the enterprise (pellet production shop) for 2020. The document was signed by the chief power engineer of the enterprise. According to the comments received from the employee responsible for SBP and the chief power engineer, the indicated values were taken on the basis of meter readings - no relevant evidence of the indicated electricity consumption values was provided. Due to a temporary omission, a decision was made to assess the non-compliance as minor.	
<b>Timeline for Conformance:</b>	By the next surveillance audit, but no later than 12 months from report finalisation date
<b>Evidence Provided by Company to close NC:</b>	Pending
<b>Findings for Evaluation of Evidence:</b>	Pending
<b>NC Status:</b>	Open

NC number 02	NC Grading: Minor
<b>Standard &amp; Requirement:</b>	SBP Instruction Document 5E: Collection and Communication of Energy and Carbon Data, V1.1, November 2019; p. 6.2.1, 6.2.3  6.2.1 The SAR Reporting Period shall meet the following criteria: - the period should be 12 consecutive months; and

	<p>- the start date shall not exceed 18 months before the audit onsite closing meeting date as indicated in the SAR.</p> <p>The BP may select a convenient Reporting Period, for example, fiscal year, civil/calendar year or any other 12-month period if it fits those requirements.</p> <p>Examples:</p> <p>1) The audit onsite closing meeting is conducted on 1 April year Y. The BP may use data from the calendar year Y-1 as the start date of the reporting period is 15 months before the date of the audit onsite closing meeting.</p> <p>2) The audit onsite closing meeting is conducted on 1 November year Y. The BP may not use the whole calendar year Y-1 as the reporting period as Y-1 exceeds 18 months from the date of the audit onsite closing meeting. The BP could select the period 1 May year Y-1 to the end of April year Y, as the Reporting Period start date then corresponds to 18 months before the date of the audit onsite closing meeting.</p> <p>6.2.3 Where a Reporting Period other than 12 months is used the BP shall justify the Reporting Period used in the SAR. Examples of justifications include: a recent commissioning or a significant change as described in 6.2.2 For recently (re-)commissioned plants, engineering values may be used as verifiable evidence and then actual values should be evaluated after start-up when stable operations have been reached for at least three (3) consecutive months.</p>
<b>Description of Non-conformance and Related Evidence:</b>	
<p>According to SAR, the reporting period is from 01-06-2020 to 10-07-2020, and according to section 2.3 of the SBP Manual of Magistral-Transit LLC, the reporting period is from 28-06-2020 to 01-07-2020 (discrepancy of data in different sources). The selected reporting period is not equal to 12 months (justified by the fact that the pellet production shop has not yet been fully launched). Also, the person in charge of SBP certification indicated that trial releases of pellets for June 12-15, 2020 were excluded from the accounting of energy costs. Calculations of energy costs are given based on actual values for the reporting period. At the same time, the actual values are not evaluated when they are stable, and the operations were carried out for at least three (3) months in a row. Due to a temporary omission, it was decided to assess the nonconformity as minor.</p>	
<b>Timeline for Conformance:</b>	By the next surveillance audit, but no later than 12 months from report finalisation date
<b>Evidence Provided by Company to close NC:</b>	Pending
<b>Findings for Evaluation of Evidence:</b>	Pending
<b>NC Status:</b>	Open

<b>NC number 03</b>	<b>NC Grading: Minor</b>
<b>Standard &amp; Requirement:</b>	<p>SBP Instruction Document 5E: Collection and Communication of Energy and Carbon Data, V1.1, November 2019; p. 6.8.3</p> <p>In all cases, the BP shall provide full information on power generation and use to the CB, and this shall be reported in the SAR. The metered values used for reporting shall cover not only the biomass production process but also non-biomass related process lines (for example, sawmill or other production facilities).</p>
<b>Description of Non-conformance and Related Evidence:</b>	

<p>SAR section 3.2 takes into account the use of electricity for biomass production. According to this, electricity consumption is estimated based on invoices from an external electricity supplier. At the same time, according to the comments received from the employee responsible for SBP and the chief power engineer, the indicated values are taken on the basis of meter readings - the source of energy consumption data is incorrectly indicated in the SAR. The electricity consumption specified in section 3.2 SAR was substantiated by the data of the electricity metering at the enterprise (pellet production shop) for 2020. The document was signed by the chief power engineer. At the request of the auditor, the employee responsible for SBP and the chief power engineer could not demonstrate documentary evidence confirming the correctness of the values specified in the Accounting data. Due to a temporary omission, a decision was made to assess the non-compliance as minor.</p>	
<b>Timeline for Conformance:</b>	By the next surveillance audit, but no later than 12 months from report finalisation date
<b>Evidence Provided by Company to close NC:</b>	Pending
<b>Findings for Evaluation of Evidence:</b>	Pending
<b>NC Status:</b>	Open

NC number 04	NC Grading: Minor
<b>Standard &amp; Requirement:</b>	<p>SBP Instruction Document 5E: Collection and Communication of Energy and Carbon Data, V1.1, November 2019; p. 6.9.6</p> <p>Different types of fuels may be used for drying. Either fossil fuels, such as:</p> <ul style="list-style-type: none"> <li>- natural gas;</li> <li>- industrial gas;</li> <li>- diesel oil;</li> <li>- propane; or</li> <li>- waste heat fossil boiler.</li> </ul> <p>Or biomass fuels, such as:</p> <ul style="list-style-type: none"> <li>- wood pellets – imported or diverted from the biomass product;</li> <li>- wood residues – imported or diverted from feedstock groups;</li> <li>- bark – diverted from debarked round wood in feedstock groups, or imported;</li> <li>- other biomass residues; or</li> <li>- other (specify).</li> </ul> <p>For every type of fuel used, specify fuel consumption in MJ / metric tonne and in one of these units:</p> <ul style="list-style-type: none"> <li>- litres / metric tonne biomass;</li> <li>- kg / metric tonne biomass; or</li> <li>- Nm<sup>3</sup> / metric tonne biomass.</li> </ul>
<b>Description of Non-conformance and Related Evidence:</b>	
<p>According to SAR Section 3.3b, a burner is used to dry biomass in a tumble dryer; Section 3.5 SAR indicates the amount of sawmill waste incinerated during the reporting period. At the same time, SAR does not contain data on consumption of sawdust / chips in MJ / metric ton and in one of the following units (liters / metric ton of biomass; - kg / metric ton of biomass; or - Nm<sup>3</sup> / metric ton of biomass) according to the requirement of paragraph standard. Due to a temporary omission, it was decided to assess the nonconformity as minor.</p>	
<b>Timeline for Conformance:</b>	By the next surveillance audit, but no later than 12 months from report finalisation date

<b>Evidence Provided by Company to close NC:</b>	Pending
<b>Findings for Evaluation of Evidence:</b>	Pending
<b>NC Status:</b>	Open

<b>NC number 05</b>	<b>NC Grading: Observation</b>
<b>Standard &amp; Requirement:</b>	SBP Framework Standard 2: Verification of SBP-compliant Feedstock, V.1.0, March 2015;  p.15.4 The management system shall identify the personnel responsible for implementing systems and procedures.
<b>Description of Non-conformance and Related Evidence:</b>	
According to order No. 6-m of 01.07.2020, section 3.2 of the SBP Manual of Magistral-Tranzit LLC and comments from representatives of the company's management, a certification engineer was appointed responsible for SBP certification. At the same time, in accordance with section 3.1.1 of the Manual, for the first and subsequent years after the start of production, the head of the shop for the production of fuel pellets is responsible for SBP certification (information discrepancy in different sources).	
<b>Timeline for Conformance:</b>	Other
<b>Evidence Provided by Company to close NC:</b>	Pending
<b>Findings for Evaluation of Evidence:</b>	Pending
<b>NC Status:</b>	Open

# 11 Certification decision

Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:

<b>Certification decision:</b>	Certification approved
<b>Certification decision by (name of the person):</b>	Artem Kornilov
<b>Date of decision:</b>	20/Oct/2020
<b>Other comments:</b>	BP should inform CB immediately when stable operations of the pellets production have been reached during three (3) consecutive months. An additional audit is required after receiving this information from BP.