

# NEPCon Evaluation of DeCom LLC Compliance with the SBP Framework: Public Summary Report

First 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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## Table of Contents

- 1 Overview
- 2 Scope of the evaluation and SBP certificate
- 3 Specific objective
- 4 SBP Standards utilised
- 4.1 SBP Standards utilised
- 4.2 SBP-endorsed Regional Risk Assessment
- 5 Description of Company, Supply Base and Forest Management
- 5.1 Description of Company
- 5.2 Description of Company's Supply Base
- 5.3 Detailed description of Supply Base
- 5.4 Chain of Custody system

#### 6 Evaluation process

- 6.1 Timing of evaluation activities
- 6.2 Description of evaluation activities
- 6.3 Process for consultation with stakeholders

#### 7 Results

- 7.1 Main strengths and weaknesses
- 7.2 Rigour of Supply Base Evaluation
- 7.3 Compilation of data on Greenhouse Gas emissions
- 7.4 Competency of involved personnel
- 7.5 Stakeholder feedback
- 7.6 Preconditions
- 8 Review of Company's Risk Assessments
- 9 Review of Company's mitigation measures
- 10 Non-conformities and observations
- 11 Certification recommendation

# 1 Overview

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Current report completion date:	08/Oct/2020
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Certified Supply Base:	Russia, Irkutsk regions and Krasnoyarsk krai
SBP Certificate Code:	SBP-07-28
Date of certificate issue:	02/Oct/2019
Date of certificate expiry:	01/Oct/2024

#### This report relates to the First Surveillance Audit

# 2 Scope of the evaluation and SBP certificate

Scope description: Production of wood pellets in Bratsk, Irkutsk region, Russia, for use in energy production, and its transportation by different means of transport to different end points all over the world. 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 and assessment of compliance with ID 5E ver. 1.0.

# 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 <u>https://sbp-cert.org/documents/standards-documents/standards</u>

- □ 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 wood processing (primary and secondary) company located in Irkutsk region, Russia. Total annual production capacity of pellet plant is 52000 tones.

Company runs both pellet and lumber production, which supplies secondary feedstock with FSC 100% and FSC Mix Credit claims to the pellet plant. Secondary feedstock is not delivered by the external suppliers.

The round wood used at lumber production line (logs for primary production) originates from Irkutsk region and Krasnoyarsk krai and has mostly FSC 100% claim; one supplier delivers the round wood with FSC Mix Credit claim.

The BP has implemented FSC transfer system and all amount of produced biomass is sold with FSC Mix Credit claim – i.e after mixing the secondary feedstock with FSC 100% and FSC Mix Credit claim, BP downgrades the claim for pellets to FSC Mix Credit.

The biomass is transported by railway to Noviy port harbour in S.Petersburg, but potentially may be transported to any other harbour or railway station in Russia on FCA Incoterms delivery conditions.

Pellet plant was commissioned in October 2017.

## 5.2 Description of Company's Supply Base

DeCom LLC is a biomass producer located in Bratsk, Irkutsk Region. DeCom LLC has its own production site, which includes a sawmill, molded products workshop, a line for the production of wood pellets, drying complex for lumber, etc. The pellet line was launched in 2017 to process residues from its own wood processing industry (offcuts, sawdust and shavings). DeCom LLC receives sawlogs from its own leased area, as well as from suppliers and sub-suppliers. DeCom LLC holds FSC certificates: FC-FM / COC-643667 forest management certificates and FC-COC-643066 supply chain. SBP-compliant biomass is produced out of FSC 100% and FSC Mix Credit feedstock. In addition, the company produces non-SBP-compliant biomass without FSC claims and ensures the physical separation of FSC feedstock and biomass from uncertified.

Species composition in biomass production - Siberian larch (Larix sibirica) 65%, Scots pine (Pínus sylvéstris) 25%, Siberian spruce (Pícea obováta) + Siberian fir (Ábies sibírica) 10%.

The Supply base of DeCom LLC is the forest fund of the Irkutsk region and the Krasnoyarsk Krai. DeCom LLC has its own forest-management unit in the Krasnoyarsk Krai, from where the FSC-certified sawlogs come from. From suppliers, roundwood comes from different parts of the Irkutsk region with FSC 100% and FSC Mix Credit claims.

Krasnoyarsk Krai has one of the largest forest resources among Russian regions. The territory of the forest fund of the region is 158,7 million hectares. The total stock of forests amounts to 11,7 billion m3 - this is about 1/3 of the Siberian Federal District reserves and 1/7 of the total Russian forest stock. In the structure of forest stands of the Krasnoyarsk Krai coniferous stands prevail, the share of which is about 76%.

The forest fund of the Irkutsk region is 71,5 million hectares. According to the information contained in the regional Forest Plan, 12% of the country's forest reserves are concentrated in the region. But not all forest area is covered with forests. Some of them have been cut down and not yet replanted; part damaged by fires; about 1,6 million hectares are occupied by glades, ravines, roads, buildings, etc. The total standing stock is 8,8 billion m3, including the stock of coniferous stands – 7,5 billion m3.

Less than 1% of raw materials are used in the production of wood pellets and fuel briquettes from the total volume of timber harvest in the Irkutsk region and Krasnoyarsk region.

In accordance with the legislation of the Russian Federation, all lands of the forest fund are in state ownership. Legal entities receive forest plots for use for a period of 10 to 49 years on loan (with the possibility of their prolongation). Long-term rental relations are the dominant legal form for obtaining the right to harvest timber on stem. The conclusion of lease agreements for forest plots or purchase and sale agreements for forest stands is carried out at auctions for the sale of the right to conclude such agreements. Land leased, must pass a 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 regulation), implement measures for the conservation, protection and reproduction of forests, submit a forest declaration and make addendums to it about the planned way of forest resources use. Once a quarter, tenants are required to submit a forest declaration containing a report on the implemented measures and logging volumes of felling for a calendar year with a cumulative total.

Within the Supply Base, 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 is 60-120 years. Only clear cuts are used as a method of wood harvesting at the maturity stage with subsequent reforestation. Sanitary felling is also possible. The maximum cutting area is limited to 50 ha. Reforestation can be done with planting seedlings or the promotion of natural regeneration. Ensuring high-quality reproduction of forest resources and protective afforestation is a prerequisite for the use of forests. To do this, a Forest Development Project is being developed, the measures in which are aimed at improving the forestry characteristics of the forest area, and the implementation of continuous and sustainable forest management.

The composition of the forests of the Krasnoyarsk Krai and the Irkutsk Region includes Scots pine (Pinus sylvestris), Siberian larch (Larix sibirica), Siberian cedar pine (Pinus sibirica), Siberian spruce (Picea obovata), Siberian fir (Abies sibirica), and Silver birch (Betula pibirula), aspen (Populus tremula), ), a tree-shaped willow (Salix spp.) is found.

When harvesting wood, according to the forest legislation species listed in the Red Book, as well as their habitats, are subject to conservation. Harvesting of valuable, endangered and specially protected species of trees is prohibited. On the territory of the Krasnoyarsk Krai there are such types of trees listed in the Red Book as Small-leaved Birch (Betula microphylla Bunge), Pseudocossack Juniper (Juniperus pseudosabina Fisch. & C.A. Mey.). In the Irkutsk Region, Siberian Blue Spruce (Picea obovate Ledeb. Var. Coerulea Malysch) and Berry Apple Tree (Malus baccata (L.) Borkn.) are subject to conservation. Areas with a predominance of Siberian cedar pine (Pinus sibirica) are prohibited for cutting in the Irkutsk region.

DeCom LLC does not procure and does not purchase tree species listed in the Red Book or CITES list.

DeCom LLC is located in Bratsk, Irkutsk Region. Bratsk serves as an important support base for the development of the northern regions of Eastern Siberia and the Far East of Russia. The company provides jobs for residents of the Krasnoyarsk Krai and the Irkutsk Region.

The main enterprises of the forest industry in the Irkutsk region, which are also the largest tenants and loggers: JSC Ilim Group, JSC Bratsk Timber Industry Complex (BLPK) - manufacturers of pulp and cardboard; Omfal LLC, Ind-Timber LLC, Lesresurs LLC, PromLesTrade LLC, IP Zarechny, Madera CJSC - manufacturers of lumber and pellets; LLC TM Baikal, CJSC KATA, LLC Orion, LLC Lesobalt - manufacturers of lumber; Usolsky Plywood Plant LLC, Ilim Timber LLC - plywood manufacturers.

DeCom LLC is one of the 20 largest enterprises in the Irkutsk region in terms of timber processing, although it does not independently harvest timber in the region.

Raw material ratio: FSC certified raw materials 54%, and non-certified materials 46%. In the reporting period, sawlogs for primary processing were supplied from 7 FSC-certified enterprises and from 13 enterprises with non-certified material.

### 5.3 Detailed description of Supply Base

Total Supply Base area (ha):	230,2 mln. ha
Tenure by type (ha):	public 230,2 mln. ha
Forest by type (ha):	boreal 230,2 mln. ha
Forest by management type (ha):	managed natural 325,4 mln. ha
Certified forest by scheme (ha):	12,5 mln. ha FSC-certified forest

Detailed information about BP's supply base may be found in their Supply Base Report available at company's homepage <u>http://www.ooodekom.ru/pellets</u>:

## 5.4 Chain of Custody system

The BP holds valid FSC Chain of certificate

https://info.fsc.org/details.php?id=a0240000008ph3aAAA&type=certificate

BP implements FSC transfer system of claims – most of the round wood for primary processing (sawmilling) is sourced with FSC 100% claim, and one supplier delivers the round wood with FSC Mix Credit claim.

After the reception, incoming volume of the primary feedstock (saw logs) is registered in Organisation's database and processed at sawmilling and wood-working facilities. Pellets are produced of the FSC 100% and FSC Mix Credit secondary feedstock (sawdust and wood offcuts), originating exclusively from own sawmilling and wood-working facilities. All pellets then have FSC Mix Credit claim (downgrading). There is also an option to ensure separate production of FSC 100% pellets from FSC 100% feedstock, and FSC Mix Credit pellets from FSC Mix Credit feedstock, but it has not been used in the reporting period. Non-certified wood material is also used by Organisation, and physical segregation of certified and non-certified wood material is ensured at all production stages (both for primary and secondary manufacturing).

# 6 Evaluation process

### 6.1 Timing of evaluation activities

Audit was conducted on September 28-29, 2020 (total app.11 hours). Audit activities included documents review, inspection of production facilities and staff interviews.

Activity	Location	Date/time
Opening meeting	Bratsk, BP's office	28/09/2020
		09.45-10.00
Interview with H&S engineer, H&S documents review	Bratsk, BP's office	28/09/2020
		10.00-10.30
SBP-related documents review (SBP	Bratsk, BP's office	28/09/2020
resonsible		13.00-12.00
Evaluation of critical control points in FSC CoC	Bratsk, BP's office	28/09/2020
physical segregation of certified and non- certified wood material)		12.00-13.00
Information in Radix – staff interview and	Bratsk, BP's office	28/09/2020
		13.00-13.30
SBP-related documents review (SAR, primary calculations of GHG data); interview with SBP	Bratsk, BP's office	28/09/2020
responsible		13.30-17.00
Inspection of the production facilities (chain of	Bratsk, pellet plant	29/09/2020
interview onsite		09.00-09.30
SBP-related documents review (SAR, primary	Bratsk, BP's office	29/09/2020
responsible and other involved staff		09.30-13.15
Closing meeting	Bratsk, BP's office	29/09/2020
		13.15-13.30

### 6.2 Description of evaluation activities

Composition of audit team:

Auditor(s), roles	Qualifications
Nikolai Tochilov, audit	NEPCon SBP lead auditor. He has successfully passed SBP auditor training in
team leader	Tallinn in January 2015; previous experience with more than 50 SBP
	assessments and annual audits in Russia and Europe.
Aleksandra	SBP auditor in training. She has successfully passed online SBP auditor training
Paikacheva, trainee	organised by SBP in August 2020. No previous experience in SBP auditing.
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:

Annual audit started the opening meeting in with the staff responsible for FSC CoC and SBP certification.

Audit team leader introduced the audit team, 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 accreditation 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 and SBP-controlled biomass. During the process, overall responsible person for SBP system and other staff members were interviewed. Furthermore, the audit activities included roundtrip at the pellet plant and staff interviews, mostly focusing on verification of energy use data included in SAR.

Finally, 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.

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: https://preferredbynature.org/impartiality-policy

#### 6.3 Process for consultation with stakeholders

No stakeholders consultations conduction prior to, during or after this audit.

# 7 Results

#### 7.1 Main strengths and weaknesses

Strengths: Robust recordkeeping system. Good awareness of certification requirements by involved staff.

Weaknesses: see NCRs in Section 10 below.

### 7.2 Rigour of Supply Base Evaluation

Not applicable.

### 7.3 Collection and Communication of Data

The following energy sources are used by BP: diesel for feedstock delivery and handling; biofuel for feedstock drying; electricity for biomass production; diesel for biomass handling and shipping; diesel and electricity for biomass transportation to customer. Relevant energy use results included in SAR are mostly based on actual measurements.

#### 7.4 Competency of involved personnel

Interviewed staff was well familiar with their responsibilities. There are few staff members involved in SBP certification: SBP responsible (FSC CoC, SBP management and monitoring, SAR, complaints procedure, SBR), pellet production chief (feedstock and biomass moisture measurements, monitoring of the amount of feedstock used in production and the amount of produced biomass), accountant (diesel consumption), pellet plant foreman (moisture measurements and registering), chief power engineer (electricity), declarant (invoices and DTS), H&S engineer (H&S), vice director general (compliance with legal requirements, anticorruption policy).

#### 7.5 Stakeholder feedback

No stakeholder consultations conducted by NEPCon prior to, during or after this audit.

#### 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

NC number 01/19	NC Grading: Minor	
Standard & Requirement:	SBP Instruction Document 5B V.1.1 p. 5.5.4	
	Where data is not available (such as during the commissioning of	
	plants), estimates from design parameters can be used. The BP shall	
	justify the use of any nominal values to the CB, and this shall be	
	recorded in the SAR.	
Description of Non-conformanc	e and Related Evidence:	
Pellet plant is not equipped with s implemented. Installed power of a was counted and multiplied on co why they took the coefficient of m coefficient could vary from 0,5 to the average value of electricity co NCR.	eparate electric meter(s). Therefore, engineering calculations have been ill electric machinery at pellet plant (including wood chipper and lighting) efficient of machinery loading (0,6). BP staff could not justify to auditor achinery loading as 0,6. In opinion of different staff members, the 0,8. Considering that the final result of electricity consumption is above nsumption of the other pellet plants of such size, auditor raised minor	
Пеллетное производство не оборудовано отдельным электросчетчиком. Поэтому был использован теоретический расчет. Установленная мощность используемого на пеллетном производстве оборудования (включая рубительную машину и освещение) была умножена на коэффициент загрузки оборудования (0,6). Представители Организации не смогли пояснить аудитору, почему был использован именно такой коэффициент загрузки. По мнению разных сотрудников Организации, коэффициент загрузки может варьировать от 0,5 до 0,8. С учетом того, что финальный результат расчета потребления электроэнергии выше средних показателей электропотребления у других		
Timeline for Conformance:	By the next surveillance audit, but no later than 12 monhts from report finalisation date	
	До следующего ежегодного аудита, но не позднее 12 месяцев с даты утверждения отчета	
Evidence Provided by Company to close NC:	Calculation of installed power and weighted average load factor of the electrical equipment for wood chipper, pellet line, dryer and lighting.	
	Explanations by stan.	
	Расчет установленной мощности и средневзвешенного коэффициента загрузки электрооборудования для рубительной машины, пеллетной линии, аэродинамической сушилки и теплогенератора. Пояснения работников.	
Findings for Evaluation of Evidence:	BP has submitted the detailed calculation of installed power and weighted average load factor of the electrical equipment for wood chipper, pellet line, dryer and lighting. The final result of the weighted average load factor is 0,648.	
	Представлен детальный расчет установленной мощности и средневзвешенного коэффициента загрузки электрооборудования для рубительной машины, пеллетной линии, аэродинамической сушилки, теплогенератора и освещения. Рассчитанная величина коэффициента загрузки составляет 0,648.	

NC Status:	CLOSED / ЗАКРЫТО

#### List of NCRs raised during the current annual audit.

NC number 01/20	NC Grading: Minor
Standard & Requirement:	SBP Standard 4, p 5.3.1 All requirements of the relevant chain of custody control system specified in the SBP-approved CoC system shall be implemented to calculate outputs.
Description of Non-conformanc	e and Related Evidence:
One of three feedstock input groups for biomass production is wet sawdust. In the reporting period BP monitored the input amount for this group by counting/registering the amount of shovels with sawdust after drying. The weight of the shovel with dried sawdust is known – it is 1 tone. To convert amount of dry sawdust back to wet sawdust, BP used conversion factor 1,1-1,2. During the audit it was identified that with implementation of such conversion factor, it is impossible to ensure mass balance between the amount of wet feedstock (considering the loss of moisture during drying) and amount of produced biomass. Organisation has determined the weight of the shovel with wet sawdust again, and it appeared that it is 1,4 tones (i.e. to convert the amount of dried sawdust back to wet sawdust, 1,4 conversion factor should have been used). In such case, the amount of wet feedstock (considering the loss of moisture during the loss of moisture during drying) and amount of produced biomass is well balanced. Nevertheless, auditor considers that not all requirements of the FSC chain of custody control system have been properly implemented by BP to calculate outputs (i.e. to justify the production conversion factor). The amount currently specified in SAR document in Table 2.1 for wet sawdust inputs in the reporting period is in fact based on a single measurement of the wet sawdust amount (weight) in one shovel. At the same time, the weight of wet sawdust may vary, depending on the season of the year, moisture of the sawdust, and species proportion in feedstock composition.	
Одной из трех входящих групп сырья для производства пеллет являются сырые опилки. В отчетном периоде Организация вела учет количества этой группы сырья по количеству ковшей с опилками, прошедшими сушку. Вес ковша высушенных опилок известен – он составляет 1 тонну. Для перевода количества высушенных опилок в сырые Организация использовала коэффициент в диапазоне 1,1-1,2. В ходе аудита выяснилось, что при данном коэффициенте невозможно сбалансировать количество входящего материала (с учетом потери его влажности при сушке) и количество готовой продукции. Организация заново взвесила ковш сырых опилок и оказалось, что их вес составляет 1,4 тонны (т.е. для перевода количества высушенных опилок в сырые необходимо было использовать коэффициент 1,4. В этом случае количество количество входящего материала (с учетом потери его влажности при сушке) и количество потери его влажности при сушке) и количество готовой продукции хорошо балансируется. Тем не менее, аудитор считает что Организация не в полной мере внедрила все применимые требования системы контроля цепи поставки FSC для обоснования количества прозведенной продукции (т.е. для обоснования коэффициента выхода). Указанное в настоящее время в документе SAR в таблице 2.1 количество вошедших в отчетном периоде в производство сырых опилок основано фактически на единственном замере веса одного ковша сырых опилк. Между тем, вес сырых опилок может варьировать, в зависимости от сезона года, влажности материала, а также	
	finalisation date
Evidence Provided by Company to close NC:	-
Findings for Evaluation of Evidence:	-
NC Status:	ОРЕN / ОТКРЫТО

<b>NC number</b> 02/20	NC Grading: Minor
Standard & Requirement:	SBP Instruction Document 5E, p 6.9.2 If feedstock is dried, then the following data shall be recorded in the corresponding Tables 3.3.b of the SAR. Initial moisture of the feedstock, as received, and method for its evaluation: - weighted average of moisture measurements performed on all Feedstock Groups; - <i>typical value based on some measurements (frequency of measurements,</i> - supplier / process specifications); or - default value, e.g. for round wood. Type of dryer: - drum dryer; - belt dryer; or - other (specify). Energy carrier: - steam; - hot water; - hot water; - hot water; - hot air / flue gases; or - other (specify) Heat consumption if a meter is installed Origin of the heat: - burner; - conventional burner; or - CHP

#### Description of Non-conformance and Related Evidence:

One of three feedstock input groups for biomass production is wet sawdust. In the reporting period BP monitored the moisture value for this group by based on information about moisture value of wet sawn material produced at primary processing facilities. The average moisture value of wet sawdust in the reporting period was determined as 68,8%. During the audit it was identified that with implementation of such average moisture value, it is impossible to ensure mass balance between the amount of wet feedstock (considering the loss of moisture during drying) and amount of produced biomass. Organisation during the audit has measured again the moisture value for wet sawdust, and it appeared that it is 35,5%. In such case, the amount of wet feedstock (considering the loss of moisture during drying) and amount of produced biomass is well balanced.

The moisture value for wet sawdust currently specified in SAR document in Table 2.1 is in fact based on a single measurement of the moisture value, done during the audit. At the same time, the moisture of wet sawdust may vary, depending on the season of the year.

Одной из трех входящих групп сырья для производства пеллет являются сырые опилки. В отчетном периоде Организация вела учет влажности для этой группы сырья по влажности продукции первичного производства (т.е. сырых пиломатериалов). Расчитанная средняя влажность опилок в отчетном периоде составила 68,8%. В ходе аудита выяснилось, что при данном среднем значении влажности невозможно сбалансировать количество входящего материала (с учетом потери его влажности сырых опилок и оказалось, что их влажность составляет 35,5%. В этом случае количество количество входящего материала (с учетом потери его влажности при сушке) и количество составила (с учетом потери его влажности при сушке) и количество готовой продукции хорошо балансируется.

Указанное в настоящее время в документе SAR в таблице 2.1 значение влажности вошедших в отчетном периоде в производство сырых опилок основано фактически на единственном замере влажности, сделанном в ходе аудита. Между тем, влажность сырых опилок может варьировать, в зависимости от сезона года.

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:	
Findings for Evaluation of	-
Evidence:	
NC Status:	ОРЕЛ / ОТКРЫТО

Standard & Requirement:       SBP Instruction Document 5E, p 6.9.3 At least one of the following options shall be used for the drying process, where applicable: Option 1 – Specify energy use of dryer, when applicable.         - If a heat meter is installed, calculate how much heat energy from the boiler is provided to the dryer and provide details of the calculation;         - Specify heat consumption in kWh per metric tonne dried feedstock and the corresponding period for this evaluation.         Option 2 – Specify input moisture content of feedstock.         - The preferred method in 6.9.2 is the weighted average moisture content based on moisture evaluation per shipment for all Feedstock Group.         - When measurement of moisture of incoming feedstock is not determined on receipt of feedstock, the moisture content shall be measured and recorded as soon as possible in the production process. For example, in the case of the receipt of logs, moisture should be measured after debarking and processing to chips.         - In the absence of moisture monitoring as specified above, the methodology used and the values recorded shall be justified to the CB,	<b>NC number</b> 03/20	NC Grading: Minor
<ul> <li>Option 2 – Specify input moisture content of feedstock.</li> <li>The preferred method in 6.9.2 is the weighted average moisture content based on moisture evaluation per shipment for all Feedstock Group.</li> <li>When measurement of moisture of incoming feedstock is not determined on receipt of feedstock, the moisture content shall be measured and recorded as soon as possible in the production process. For example, in the case of the receipt of logs, moisture should be measured after debarking and processing to chips.</li> <li>In the absence of moisture monitoring as specified above, the methodology used and the values recorded shall be justified to the CB,</li> </ul>	Standard & Requirement:	<ul> <li>SBP Instruction Document 5E, p 6.9.3</li> <li>At least one of the following options shall be used for the drying process, where applicable:</li> <li>Option 1 – Specify energy use of dryer, when applicable.</li> <li>If a heat meter is installed, calculate how much heat energy from the boiler is provided to the dryer and provide details of the calculation;</li> <li>Specify heat consumption in kWh per metric tonne dried feedstock and the corresponding period for this evaluation.</li> </ul>
and the justification shall be recorded in the SAR.	Description of Non-conformance	<ul> <li>Option 2 – Specify input moisture content of feedstock.</li> <li>The preferred method in 6.9.2 is the weighted average moisture content based on moisture evaluation per shipment for all Feedstock Group.</li> <li>When measurement of moisture of incoming feedstock is not determined on receipt of feedstock, the moisture content shall be measured and recorded as soon as possible in the production process. For example, in the case of the receipt of logs, moisture should be measured after debarking and processing to chips.</li> <li>In the absence of moisture monitoring as specified above, the methodology used and the values recorded shall be justified to the CB, and the justification shall be recorded in the SAR.</li> </ul>

Fresh slabwood was used by BP in the reporting period as a biofuel for dryer. BP monitored the moisture value for this biofuel based on information about moisture value of wet sawn material produced at primary processing facilities. The average moisture value of slabwood in the reporting period was determined as 68,8% (same moisture value, as for the wet sawdust included as Feedstock type 1 in SAR, table 2.1). During the audit it was identified that with implementation of such average moisture value, it is impossible to ensure mass balance between the amount of wet feedstock (considering the loss of moisture during drying) and amount of produced biomass. Organisation during the audit has measured again the moisture value for wet sawdust, and it appeared that it is 35,5%. In such case, the amount of wet feedstock (considering the loss of moisture value for slabwood currently specified in SAR document in Table 3.5 is in fact based on a single measurement of the moisture value of wet sawdust, done during the audit. The moisture of wet feedstock may vary, depending on the season of the year.

Горбыль естественной влажности использовался Организацией в отчетном периоде в качестве топлива для теплогенерации. Организация вела учет влажности для биотоплива по влажности продукции первичного производства (т.е. сырых пиломатериалов). Расчитанная средняя влажность горбыля в отчетном периоде составила 68,8% (то же значение влажности, что и для сырых опилок, включенных в SAR, табл. 2.1 в качестве типа сырья 1). В ходе аудита выяснилось, что при данном среднем значении влажности невозможно сбалансировать количество входящего материала (с учетом потери его влажности при сушке) и количество готовой продукции. Организация в ходе аудита произвела замер влажности сырых опилок и оказалось, что их влажность составляет 35,5%.

В этом случае количество количество входящего материала (с учетом потери его влажности при сушке) и количество готовой продукции хорошо балансируется.

Указанное в настоящее время в документе SAR в таблице 3.5 значение влажности горбыля основано фактически на единственном замере влажности, сделанном в ходе аудита. Между тем, влажность сырья может варьировать, в зависимости от сезона года.

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:	
Findings for Evaluation of	-
Evidence:	
NC Status:	ОРЕЛ / ОТКРЫТО

# 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):	Oļesja Puišo
Date of decision:	08/Oct/2020
Other comments:	Click or tap here to enter text.