



# DNV GL Business Assurance Finland Oy Ab Evaluation of Stora Enso Wood Products, OOO Setnovo, Nebolchi Mill Compliance with the SBP Framework: Public Summary Report

Fourth 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](http://www.sbp-cert.org)*

## *Document history*

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*Version 1.1: published 30 January 2018*

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# 1 Overview

CB Name and contact:	DNV GL Business Assurance Finland Oy Ab
Primary contact for SBP:	Jyrki Sopenen, jyrki.sopenen@dnvgl.com
Current report completion date:	23/Oct/2020
Report authors:	Karina Seeberg Kitnaes; Jyrki Sopenen
Name of the Company:	Stora Enso Wood Products, OOO Setnovo, Nebolchi Mill
Company contact for SBP:	Irina Vasilyeva, irina.vasilyeva@storaenso.com; tel. +7 816 686-51-01
Certified Supply Base:	North-West Russia, including the Regions of Arkhangelsk, Leningrad, Kirov, Kostroma, Novgorod, Pskov, Republic of Karelia, Tver and Vologda.
SBP Certificate Code:	SBP-05-04
Date of certificate issue:	19/Sep/2016
Date of certificate expiry:	18/Sep/2021

This report relates to the Fourth Surveillance Audit

## 2 Scope of the evaluation and SBP certificate

Production of wood pellets at Nebolchi and transportation to the port of St. Petersburg. The scope of the certificate does not include Supply Base Evaluation.

## 3 Specific objective

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

## 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

OOO Setново, Nebolchi Mill, is a saw mill complex operating under the ownership and management of Stora Enso Division Wood Products. The top management is located in Helsinki, Finland. At the local context of Nebolchi, the sawing, planing and pellet operations are managed by the mill manager and operational management staff.

The raw material of the pellet production unit originates completely from the adjacent own saw mill, including a planning unit producing shavings for pellets, and from the neighbouring sawmill. The saw dust and shavings are conveyed from the main product units by a conveyor and an air pipe to the pellet production unit and storage, while minor amounts of saw dust are transported by wheel loaders from a supporting buffer stock. The saw dust supplied by the external neighbouring sawmill is conveyed by truck to the pellet production unit and storage.

The pellets are transported either in sacks by truck or in containers by train to the port of St. Petersburg, where the ownership is transferred to the buyer when offloading.

The saw mill sources its feedstock from FSC certified and controlled forests by Stora Enso's own wood supply unit or FSC-certified and controlled suppliers within the supply base. The feedstock supplied from the main production units at the mill to the pellet production unit is transferred with FSC credit claim.

The BP holds valid FSC and PEFC COC certificates: PEFC: 169333-2014-AE-FIN-FINAS, valid from 04 Apr 2020 to 03 Apr 2025, and FSC COC+CW: DNV-COC-001077, DNV-CW-001077, valid from 16 Apr 2020 to 15 Apr 2025. The scope of the FSC certificate and of the PEFC certificate includes wood pellets as product group.



## 5.2 Description of Company's Supply Base

The sawmill's wood sourcing area is the North-West Region and Central Region, including: Novgorod, Vologda, Leningrad, Tver, The Republic of Karelia, Kostroma, Pskov and Nizhniy Novgorod. The share of Nebolchi pellet raw material from total supply base harvesting is 0,17%.

All land in supply base area is owned by Russian Federation, no private forest ownership. The logs are transported by trucks and railway to the mill complex. Stora Enso has an FSC-certified affiliate company for wood sourcing, Stora Enso Forest West. All raw material is bought and invoiced by this company. The ownership is transferred upon receive at the mill yard.

All wood sources are covered by the Stora Enso wood traceability system, which is third party certified according to PEFC Chain of Custody and FSC Chain of Custody /Controlled Wood. All wood sourcing is done in line with

- Stora Enso policy for the sustainable sourcing of wood and fibre, and land management,
- Stora Enso Supplier Code of Conduct,
- National and international laws
- FSC Controlled Wood and PEFC Due Diligence requirements.

Nebolchi pellet mill uses only sawmill residues: SBP-compliant Secondary Feedstock, with inputs purchased as FSC Mix Credit and FSC 100%.

Tree species that Stora Enso sawmills use are Pine (*Pinus sylvestris*) and Spruce (*Picea abies*). Other species (including *Betula* sp, *Larix*, *Populus*, *Alnus*, *Salix*) are also present in the forests.

No CITES or IUCN listed forest tree species are represented in the sourcing. All CITES and IUCN listed species are protected by legislation, e.g. protection areas and are excluded from commercial forests. The regional Red Books of Russia list those species of plants and animals, which are under a threat of distinction or which shall be treated with special care in the regions concerned. In FM certified areas additionally experts are involved doing field work, based on what additional set aside areas settled.

The total forest area of Leningrad, Vologda, Novgorod, Pskov, Kostroma, Tver, Republic of Karelia and Nizhniy Novgorod is 41,93 million hectares. The average annual harvesting volume represents 0,4% of the annual growth of the forests, while the net annual increment of forests is 2,7 m<sup>3</sup>/ha/year. The missing infrastructure leaves large parts of the forests beyond economic access.

Stora Enso has a policy in Russia since 1990's not to source wood from designated natural old-growth forests, from conservation areas unless in line with the conservation programme, or from areas designated for conservation planning. In addition, high conservation values of forests are protected in the managed forests. All Stora Enso's forest lease areas are managed in line with FSC Forest Management certification.

Harvesting operations take place in state owned forests, typically leased to private companies. Stora Enso has leased a total of 0.4 million hectares of state-owned forests which are all FSC Forest Management certified. Approximately 50 % of the forest area within the supply base is FSC Forest Management certified.

Forest management practices are based on the forestry law, forestry guidelines, and forest management planning practice by the state forestry organization. Also, long term forest lease companies must hold a valid forest management plan. The forest rotation period is 60-120 years. Forest is grown with 1-2 thinnings during the rotation period, with a final harvesting and a regeneration of a mature stand. Planting or natural seeding can be used in regeneration. Alternatively, forest regeneration is done in narrow stripes, which are regenerated naturally before proceeding into the next stripe. GMO trees or introduced tree species are not used.

Continuous cover forestry practice is also available. Continuous cover forestry is based on a 15-20 years harvesting cycle with selective harvesting and preservation of the viable undergrowth to form the next tree generation. In the North-West Russia's two-storey spruce-birch stands, where spruce was naturally generated under a pioneering birch layer, it is common to remove the upper birch layer with preservation of the viable spruce understorey.

## 5.3 Detailed description of Supply Base

The Supply Base is the North-West Region and Central Region, including: Novgorod, Vologda, Leningrad, Tver, The Republic of Karelia, Kostroma, Pskov and Nizhniy Novgorod. From the supply base, only certified inputs are allocated to the pellet production unit at the mill. There is no Supply Base Evaluation required.

### Supply Base

- a. Total Supply Base area (ha): 87 million ha in Leningrad, Kostroma, Nizhniy Novgorod, Novgorod, Pskov, Republic of Karelia, Tver and Vologda within SB
- b. Tenure by type (ha): State ownership/Long-term concession to forestry enterprises
- c. Forest by type (ha): 87 mill ha Boreal forest
- d. Forest by management type (ha): 87 mill ha managed semi-natural with native species
- e. Certified forest by scheme (ha): More than 50% of supply base is FM certified, including Stora Enso's forest lease areas (0,4 million hectares and suppliers' forest lease areas (0,9 million hectares), which are FSC certified.

### Feedstock

- f. Total volume of Feedstock: Band: 0-200.000 tonnes
- g. Volume of primary feedstock: N/A
- h. Volume of primary feedstock from primary forest: N/A
- i. List all species in primary feedstock, including scientific name: N/A
- j. Volume of secondary feedstock:
  - 80-100% sawdust
  - 0-19% sawmill residues.
- k. Volume of tertiary feedstock: N/A.

The Qualitative description of the Supply Base can also be found in the BPs Public Summary Report, which is available for download from the SBP website at: <https://sbp-cert.org/certificate-holders/stora-enso-wood-products-ooo-setnovo-sbp-05-04/>

## 5.4 Chain of Custody system

The BP has valid FSC and PEFC COC certificates: PEFC: 169333-2014-AE-FIN-FINAS, valid from 04 Apr 2020 to 03 Apr 2025, and FSC COC+CW: DNV-COC-001077, DNV-CW-001077, valid from 16 Apr 2020 to 15 Apr 2025. The scope of the FSC certificate and of the PEFC certificate includes wood pellets as product group.

All feedstock sourced to the main production units of the mill is covered by Stora Enso's own wood traceability system, which is third party certified according to FSC Chain of Custody/Controlled Wood and PEFC COC. All feedstock is sourced to the pellet production unit and one neighbouring mill through the FSC COC system of the sawmill using the credit system. Both the own main production mill complex and the neighbouring mill are FSC COC certified. The system and certificate cover pellets as a product group.

Based on the reviewed supplier invoices, claims are entered into the volume credit system, credits calculated and transferred correctly to sales documents. The company maintains clear volume credit accounts and summaries.

There is a common credit account management and calculation tool for the whole mill complex, where the SBP inputs and outputs are calculated and can be verified against the FSC volume credit accounts. The input invoices contain proper claims based on the FSC status so that the correct SBP status can be established for each batch (SBP compliant biomass). The BP is aware of the SBP claims and batch specific coding system, which is used on the sales invoices.

# 6 Evaluation process

## 6.1 Timing of evaluation activities

August-September 2020: Audit planning, document review (location: Home office and DNV GL office, Espoo Finland), performed by the auditors Karina Seeberg Kitnaes (TL), Jyrki Sopenen and DNVGL staff responsible at DNV GL. Duration: 0,25 person-day of total 1 person-day.

16 and 18 September 2020: The remote audit was performed by Karina Seeberg Kitnæs (TL, biologist, M.Sc., approved SBP auditor, 24 years of professional international experience with forest biodiversity, forestry, forest industry, certification, Natura 2000 implementation, key biotope mapping from working as senior expert on targeted international projects in Northern, North-eastern and Eastern Europe and many other countries), and by Jyrki Sopenen (SBP approved auditor, many years of professional experience in certification and direct employee of DNVGL Business Assurance Finland Oy Ab. The two auditors were assisted by translator Alexander Lukin.

The remote audit was performed by the auditor team with participation from ASI and from the BP via Teams with sharing of screen and access to system and interviews at the BP main office, receipt of requested documentation from the BP representatives. Duration: 1 person-day.

Day 1 (remote): 16.09.2020

- 09:30-10:00 Opening meeting: Introduction of participants, roles and confidentiality; Short introduction of the company, SBP audit process overview, Review of open Non-compliances.
- 10:00-11:30 SBP Standard 2: Verification of feedstock; incl. feedstock data, records of forest of origin and Supply Base Reports, SVP and risk mitigation measures.
- 11:30-12:30 Video tour around the storage and pellet production units at the mill, as well as the electricity monitoring station and conveyer belts and air pipes, and Health and Safety equipments.

Day 2 (remote): 18.09.2020

- 09:00-11:30 SBP Standard 4: Chain of Custody, incl. DTS records and volume calculations, SBP claims.
- 12:00-14:00 SBP Standard 5: Collection and Communication of Data; and Instruction Document 5E - requirements review of data and records; SBP Audit Report for Energy and GHG data (SAR), Verification of profile and energy data, monitoring and calculations.
- 14:00-15:00 Auditors' preparation for the closing meeting.
- 15:00-16:00 Closing meeting and end of audit.

September-October 2020: Off-site audit with system and procedures review, assessment of corrective actions, reporting, technical review (location: Home office and DNV office, Espoo Finland) performed by the Lead auditors, Technical reviewer and Certification decision maker. Duration: 0,75 person-day (total off-site 0,25+0,75=1,0 person-day).

## 6.2 Description of evaluation activities

The remote audit method included using Teams with interviews, sharing screen for documentation checks and video tour at pellet production site, storages etc., and sampling of documentation for review via e-mailing. The audit included records verification, document and report review and interviews of staff regarding the management system procedures, calculations and invoicing arrangements and records verification as well as reverse tracking of a timber batch.

This Periodic Surveillance Audit contained:

- Review of all relevant data and records related to SBP Std. 2 on verification of feedstock, including calculation verifications, control of data on origin crosschecked with supply base and review of supply base reports in English and Danish. Completion of DNVGL checklist for std. 2.
- Review of all relevant data and records related to SBP Std. 4 on Chain of Custody, including volume calculation verification, classification and crosscheck with DTS database records.
- Review of all relevant data and records related to SBP Std. 5 on collection and communication of GHG data and review and verification of data recorded and reported in the SAR for pellets including transport to end-points.

Critical control points included verification of feedstock input categories and origin and output categories: pellets (SBP-compliant biomass) and checking the chain-of-custody volume accounting and supplier documentation thoroughly against DTS recordings, as well as the data and records available as specified in SBP std. 5 and the Instruction note 5E on collection and communication of data and the resulting SAR report on Energy and Carbon Data for Pellets in correct format.

The surveillance audit resulted in three (3) minor non-conformities and two (2) observations. These are described in section 10 of this report.

## 6.3 Process for consultation with stakeholders

N/A. This is the fourth periodic surveillance.

# 7 Results

## 7.1 Main strengths and weaknesses

There is proven competency and long experience of COC management in the Stora Enso divisional management, and at the local level at the Nebolchi Mill in Russia.

As the supply base contains only certified and controlled inputs, the SBP system for the mill and the pellet production is rather simple in terms of risk management and overall. The COC system and management functions well with recording of all data in a systematic and organised way.

During this fourth Periodic Surveillance, the strengths of the company include the clear track of secondary feedstock inputs, the flows from receipt of inputs through the pellet production line to end-point including clear track and recording of all transporting and storage.

## 7.2 Rigour of Supply Base Evaluation

N/A

## 7.3 Collection and Communication of Data

Since the scope of the SBP system is rather limited and as the feedstock originates exclusively from the secondary residues, the GHG profiling data can be obtained through a quite simple routine.

The baseline and general procedures are in line with the Instruction Document 5E requirements and procedures. The BP has maintained data for the SAR on Energy and Carbon Data for Pellets, version 2.0, September 2019, re-published April 2020, where all data are based on own data recordings and data from electricity supplier and transport company.

The SAR report prepared by the company covering the reporting period 01/01/2019 - 31/12/2019 was reviewed and approved at the PA4, after the BP had adjusted the report to include corrected data and correcting a number of smaller flaws. At the time of the audit, the SAR was not complete, which resulted in a minor NC. The auditors also noted that the reporting period was not in line with the requirements of Instruction Document 5E, which resulted in a minor NC.

## 7.4 Competency of involved personnel

The personnel responsible for the system on the Stora Enso divisional management as well as at the Nebolchi Mill have a long experience of FSC Chain of Custody System management. In the Nebolchi Mill' SBP system context, the knowledge relating to GHG data profiling procedures has been improved and data calculations are clearly well run by the involved personnel.

## 7.5 Stakeholder feedback

N/A. This is the fourth periodic surveillance

## 7.6 Preconditions

None.

# 8 Review of Company's Risk Assessments

N/A



## 9 Review of Company's mitigation measures

N/A

## 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.

<b>NC number</b> SBP5-PA4-2020-01	<b>NC Grading:</b> Minor
<b>Standard &amp; Requirement:</b>	SBP STD. 5, Instruction Document 5E, 6.1.1-6.1.2, 6.10.1
<b>Description of Non-conformance and Related Evidence:</b>	
<p>During the audit, it appeared that the SAR report was not fully completed and some data was not filled in. Immediately after the audit, the BP filled in and corrected the SAR report as identified during the audit. Some of the information missing in the SAR include:- two SDI starting points were missing in the table-transport fuel consumption was not included in the table- two of three scope end points were missing in the table. The requirement laid down in the Instruction document 5E is that the BP shall present all data as requested in the SAR to the auditor during the audit in order for the CB to be able to evaluate compliance before the audit closing meeting.</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>	<i>Click or tap here to enter description provided by Company to close the NC.</i>
<b>Findings for Evaluation of Evidence:</b>	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
<b>NC Status:</b>	Open

<b>NC number</b> SBP5-PA4-2020-02	<b>NC Grading:</b> Minor
<b>Standard &amp; Requirement:</b>	SBP STD. 5, Instruction Document 5E, 6.2.1
<b>Description of Non-conformance and Related Evidence:</b>	
<p>The SAR report covers the calendar year 2019. However, the start date of the SAR exceed 18 months before the audit closing meeting data as indicated in the SAR. The argument of the BP was that this is due to postponement of the original audit date. The reason for postponement was Covid-19 restrictions before the audit was then finally settled to be a remote audit. The requirement laid down in the instruction document 5E is that the start date of the SAR reporting period should not be older than 18 months from the audit closing meeting date.</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>	<i>Click or tap here to enter description provided by Company to close the NC.</i>
<b>Findings for Evaluation of Evidence:</b>	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
<b>NC Status:</b>	Open

<b>NC number SBP2-PA4-2020-03</b>	<b>NC Grading:</b> Observation
<b>Standard &amp; Requirement:</b>	SBP STD. 2, Instruction Note 2C, 4.1
<b>Description of Non-conformance and Related Evidence:</b>	
During the audit, some information on Supply Base was found to be missing, such as information on CITES and redlist species. During the audit, the BP prepared an updated version of the SBR and submitted this to the audit team before the closing meeting. An observation is issued to remind the BP to always prepare the Supply Base Report so that it is concise and include all information required in the latest version of the SBR template for BPs found on the SBP website	
<b>Timeline for Conformance:</b>	Other
<b>Evidence Provided by Company to close NC:</b>	<i>Click or tap here to enter description provided by Company to close the NC.</i>
<b>Findings for Evaluation of Evidence:</b>	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
<b>NC Status:</b>	Open

<b>NC number SBP4-PA4-2020-04</b>	<b>NC Grading:</b> Observation
<b>Standard &amp; Requirement:</b>	SBP STD. 4, 5.2.1
<b>Description of Non-conformance and Related Evidence:</b>	
One version of an invoice from the external supplier sampled and seen during the audit did neither include the FSC code of the supplier nor the claim FSC 100%. At the time of the audit, the responsible book keeper was on holidays and the original could not be located. Immediately after the audit when the book keeper had returned, the BP submitted the original of the invoice to the auditor team with correct FSC code and claim. The other invoices sampled from the external supplier were correct. An observation is raised to remind the BP to keep correct copies of purchase invoices from suppliers in good order and available during the audit.	
<b>Timeline for Conformance:</b>	Other
<b>Evidence Provided by Company to close NC:</b>	<i>Click or tap here to enter description provided by Company to close the NC.</i>
<b>Findings for Evaluation of Evidence:</b>	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>

<b>NC Status:</b>	Open
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<b>NC number SBP4-PA4-2020-05</b>	<b>NC Grading: Minor</b>
<b>Standard &amp; Requirement:</b>	SBP STD. 4, 5.5.2-5.5.3
<b>Description of Non-conformance and Related Evidence:</b>	
For the two invoices corresponding to the transactions in the DTS, the word "biomass" has not been included as part of the claim on the invoices for sales of SBP-compliant biomass. The SBP Std. 4 requires the claims on invoices to be worded: 'SBP-compliant biomass'.	
<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>	<i>Click or tap here to enter description provided by Company to close the NC.</i>
<b>Findings for Evaluation of Evidence:</b>	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
<b>NC Status:</b>	Open

<b>NC number SBP5-PA3-2019-01</b>	<b>NC Grading: Observation</b>
<b>Standard &amp; Requirement:</b>	SBP Standard 5, Instruction Document 5B, 3.2.9
<b>Description of Non-conformance and Related Evidence:</b>	
During the audit, all data reported in the ID5B SAR report was checked against the recordings and calculations of the BP. All data was possible to find and the calculations were well justified and sources presented. However, during the audit quite some time was spent on finding the data. This observation is raised to remind the BP to have procedures, data and records organised so that all SBP data reported in the ID5B SAR report and the ID5C profiling data sheet are immediately available during the external SBP audits.	
<b>Timeline for Conformance:</b>	Other
<b>Evidence Provided by Company to close NC:</b>	Recorded data and calculations of data reported in the SAR
<b>Findings for Evaluation of Evidence:</b>	During the audit, the company had recorded data available to support and show the calculations used for the reported data in the SAR report.
<b>NC Status:</b>	Closed

<b>NC number P1-1-2017-1P31</b>	<b>NC Grading: Minor</b>
<b>Standard &amp; Requirement:</b>	SBP Standard 2, 6.3
<b>Description of Non-conformance and Related Evidence:</b>	

<p>The BP has declarations from all suppliers stating that the raw material originates from the countries listed in the provided declarations. These declarations are renewed annually. However, the suppliers are not obliged to inform Stora Enso in case there are some amendments in the supply bases of the suppliers. Thus, there is no full-covering mechanism for ensuring that the place of harvesting is located in the defined supply base.</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>	Records, supplier declarations and transportation documents
<b>Findings for Evaluation of Evidence:</b>	The pellet production only receives secondary feedstock from own sawmill and one neighbouring mill. All supplies are FSC 100% or FSC CW. Records in place to prove place of harvest to within the defined SB. The Stora Enso traceability system ensures that the origin is recorded and the origin checked for being within the SB. Transport documents are available to the BP. For the FSC 100% inputs from the neighbouring mill, the BP receives annual records of origin from the supplier, which the BP crosschecks with the SB. The BP has not had any sales of SBP-compliant biomass since 2017.
<b>NC Status:</b>	Closed

<b>NC number P1-2-2017-1P31</b>	<b>NC Grading: Minor</b>
<b>Standard &amp; Requirement:</b>	SBP Standard 2, 6.2
<b>Description of Non-conformance and Related Evidence:</b>	
<p>Since Initial Audit, the BP has acquired two new saw dust suppliers. For these suppliers, there is no access to records showing the origin of the raw material. Although both suppliers are FSC-certificate holders, the BP shall have an arrangement to record the place of harvesting.</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>	Records, supplier declaration and transport documentation
<b>Findings for Evaluation of Evidence:</b>	For the FSC 100% inputs from the neighbouring mill, the BP receives annual records of origin from the supplier, which the BP crosschecks with the SB. For the supplier declaration and records on origin, the BP crosschecks that the origin stated is within the defined supply base. The BP has not had any sales of SBP-compliant biomass since 2017.
<b>NC Status:</b>	Closed

<b>NC number P1-3-2017-1P31</b>	<b>NC Grading: Observation</b>
<b>Standard &amp; Requirement:</b>	SBP Std. 2, 15.4
<b>Description of Non-conformance and Related Evidence:</b>	

The person recording the transactions in the DTS has not been defined. This finding is issued as an Observation, since the SBP responsible has general responsibility over SBP and there is no confusion about it in practice.	
<b>Timeline for Conformance:</b>	Other
<b>Evidence Provided by Company to close NC:</b>	Interview with SBP responsible and procedures manual, demonstration of logging into the DTS
<b>Findings for Evaluation of Evidence:</b>	The personnel responsible for the SBP related procedures are clearly defined. The SBP responsible has also been defined to be the person to record the transactions in the DTS.
<b>NC Status:</b>	Closed

<b>NC number P1-4-2017-1P31</b>	<b>NC Grading: Minor</b>
<b>Standard &amp; Requirement:</b>	SBP Standard 5, Instruction Document 5B, 5.1.3
<b>Description of Non-conformance and Related Evidence:</b>	
The supporting evidence was missing for diesel consumption figures for handling of feedstock. The given data were estimates provided by the subcontractor.	
<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>	Data, records signed by contractor, calculations
<b>Findings for Evaluation of Evidence:</b>	The BP has maintained records of data and methodology for calculation energy use, including diesel consumption in a plausible way. Data provided by subcontractor and records maintained by the BP.
<b>NC Status:</b>	Closed

<b>NC number P1-5-2017-1P31</b>	<b>NC Grading: Minor</b>
<b>Standard &amp; Requirement:</b>	SBP Standard 5, Instruction Document 5B, 3.1.1
<b>Description of Non-conformance and Related Evidence:</b>	
Minor errors and inconsistencies in the SAR data:- The actual length of the conveyor for Feedstock ID 3 is 36,8 m instead of 30 m.- In the process descriptions, handling in the harbour and vessel transportation are described although these phases are not included in the scope of the SBP system.- The moisture content of feedstock after the dryer is given as a range of variation (9-12 %) instead of a fixed average.- The given moisture content of the pellets was 6,43 % but according to the calculated average of all measurements for year 2016 the correct value is 6,457 %- The use of wood chips in the boiler: according to SAR 0,007 but according to data and calculation 0,0077 t/ton of pellets- The use of bark in the boiler: according to SAR 0,078 but according to data and calculation 0,0701 t/ton of pellets	
<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>	Records, data, calculations
<b>Findings for Evaluation of Evidence:</b>	During the audit, the details, data and records behind the SAR report was checked and calculations were checked. All data was found to be supported by recorded data and calculations were found correct.
<b>NC Status:</b>	Closed

# 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>	Kimmo Haarala
<b>Date of decision:</b>	26/Oct/2020
<b>Other comments:</b>	Based on the fourth Periodic Surveillance process, it has been shown that the management system implemented by the BP meets the requirements of the applicable SBP standards and the certificate remains valid. The corrective action resulting from the three minor NC shall be implemented within 12 months following this surveillance.