



NEPCon Evaluation of UAB “Gairelita” Compliance with the SBP Framework: Public Summary Report

Re-assessment

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Completed in accordance with the CB Public Summary Report Template Version 1.4

For further information on the SBP Framework and to view the full set of documentation see www.sbp-cert.org

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1 Overview

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Current report completion date:	10/Nov/2020
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Name of the Company:	UAB "Gairelita"
Company contact for SBP:	Mr. Kestutis Burdulis, economic adviser
Certified Supply Base:	sourcing from Latvia, Lithuania, Estonia, Norway, Sweden, Belarus, Russia
SBP Certificate Code:	SBP-01-10
Date of certificate issue:	04/Mar/2021
Date of certificate expiry:	03/Mar/2026

This report relates to the Re-assessment

2 Scope of the evaluation and SBP certificate

Scope of this evaluation is based on SBP standards 2; 4; and 5.

The certificate scope covers the production site in Radviliskis, Lithuania. The Organisation holds valid FSC Chain of Custody and FSC Controlled wood certificate, covering pellet production.

The input material used by the organisation for biomass production (both as raw material for pellet production and feedstock used into dryer) contains secondary feedstock supplied by suppliers from Lithuania and Latvia. Based on FSC system (credit system) FSC certified and controlled feedstock is used for FSC pellet production. Wood pellets are sold through Klaipeda (under FOB, DAP) port in Lithuania and Riga (under FOB, DAP) port in Latvia as well as from production side (under EXW). The scope includes Instruction Document 5E Dynamic Batch Sustainability Data.

All inputs materials delivered to the pellet production plant are FSC certified, PEFC certified, FSC controlled wood or included in the Organisation's FSC Controlled wood verification system. Feedstock used in the biomass production originates from Latvia, Lithuania, Estonia, Belarus, Norway, Russia and Sweden.

Scope description:

Production of wood pellets, for use in energy production, at Radviliskis, Lithuania and transportation to port of Riga, Klaipeda. The scope of the certificate includes instruction document 5E: Collection and Communication of Energy and Carbon Data and 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 is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification. Evaluation of the practical implementation of the requirements of the applicable standards.

The scope of the evaluation covered:

- Review of the BP’s management procedures;
- Review of the production processes, production sites 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;
- Review of the updated Supply Base Report;
- Evaluation of mitigation measures implemented for secondary feedstocks;
- SAR and profiling data collection analysis;
- Instruction Document 5E Dynamic Batch Sustainability Data

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. Supply Base Evaluation is not covered by the Scope of the Evaluation

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

BP is a biomass producer with a production site situated in Radviliskis, Lithuania. BP is sourcing secondary feedstock for its production. Pellets are produced from sawmill residuals (chips, sawdust and shavings). The pellets could be sold as SBP compliant by bulk.

The suppliers from Latvian and Lithuanian deliver feedstock; however, the place of harvesting of the secondary feedstock is originating from not only Latvia and Lithuania, but also Belarus, Estonia, Norway, Sweden and Russia. All Feedstock is delivered to the pellet plant by road transport. BP is using its own transport, so the information about the producer is available and is trustworthy.

Incoming feedstock is either FSC certified, PEFC certified, FSC Controlled or controlled according to the existing BP FSC Controlled wood verification program. FSC Controlled wood verification program is applicable for feedstock originating from Latvia and Lithuania. The feedstock originating from Belarus, Norway, Estonia, Sweden and Russia is coming with FSC claim. Origin information is kept, and origin information access agreements are signed with feedstock suppliers. As a part of the Origin Verification program BP is conducting regular supplier audits and requesting its suppliers to sign origin declaration agreements.

The BP is implementing FSC credit system. The amount of the biomass produced according to FSC credit system might be sold as SBP-compliant or SBP- controlled biomass claim.

After the production, pellets are stored in BP's facilities and then loading into the buyer's transport. Sales are done based on the FOB, DAP or EXW sales conditions.

5.2 Description of Company's Supply Base

BP is sourcing secondary feedstock only for its production. All feedstock is delivered by companies registered in Latvia and Lithuania; however, the feedstock may originate also from Belarus, Norway, Sweden, Estonia and Russia.

Latvia:

3.2 million ha of forest, agricultural lands 1,87 million ha. Forests cover 51% of the total area. Area covered by forests is increasing. The expansion happens due to both natural afforestation of unused agricultural lands and by afforestation of low fertility agriculture land. Forests lands consist of forests 91,3%, marshes 5.3%, open areas 1,1%), flooded areas 0,5% and objects of infrastructure 1,8%. The main wood species are pine 34.3%, birch 30.8% and spruce 18.0%. Other wood species are aspen, aspen, black alder, ash and oak.

51.8% of whole forest area is owned by state, 1.4% are in municipal ownership, but other 46.8% are private forests and other forest ownership types (data: State Forest Service statistics, 2014). Management of the state-owned forests is performed by the public joint stock company AS Latvijas Valsts Meži, established in 1999.

The enterprise ensures implementation of the best interests of the state by preserving value of the forest and increasing the share of forest in the national economy.

Historically, extensive use of forests as a source of profit began later than in many other European countries, therefore a greater biological diversity has been preserved in Latvia. For the sake of conservation of natural values, a total number of 674 protected areas have been established. Part of the areas have been included in the European network of protected areas Natura 2000. Most of the protected areas are state-owned.

In order to protect high nature conservation values such as rare and endangered species and habitats that are located outside designated protected nature areas, micro reserves are established. According to data of the State Forest Service (2015), the total area of micro reserves constitutes 40 595 ha. Identification and protection planning of biologically valuable forest stands is carried out continuously primarily in state forests.

On the other hand, there are general nature protection requirements binding to all forest managers established in forestry and nature protection legislation aimed at preservation of biological diversity during forest management activities. They stipulate a number of requirements, for instance, preserving old and large trees, dead wood, undergrowth trees and shrubs, land cover around micro-depressions thus providing habitat for many organisms, including rare and/or endangered species.

Latvia has been a signatory of the CITES Convention since 1997. CITES requirements are respected in forest management, although none of local Latvian tree and shrub species are included in the CITES annexes.

Areas where recreation is one of the main forest management objectives add up to 8 % of the total forest area or 293 000 ha (2012). Observation towers, educational trails, natural objects of culture history value, picnic venues: they are just a few of recreational infrastructure objects available to everyone free of charge. Special attention is devoted to creation of such areas in state-owned forests. Recreational forest areas include national parks (excluding strictly protected areas), nature parks, protected landscape areas, protected dendrological objects, protected geological and geomorphologic objects, nature parks of local significance, the Baltic Sea dune protection zone, protective zones around cities and towns, forests within administrative territory of cities and towns. Management and governance of specially protected natural areas in Latvia is co-ordinated by the Nature Protection Board under the Ministry for Environmental Protection and Regional Development.

5% of Latvian inhabitants are employed in forestry, wood-working industry, furniture production industry.

The share of forestry, woodworking industry and furniture production amounted to 6 % GDP in 2012, while export yielded 1.7 billion euro (17 % of the total volume of export). State forests are FSC/ PEFC certified. In addition to state forest enterprise, 6 private forest managers are managing forests in accordance with FSC standard requirements. The FSC certified are in the country amounts to a total of 1,743,157 ha, including 248,021 ha of private forestland. 1,683, 641 ha forests are also PEFC certified.

Lithuania

Agricultural land covers more than 50 percent of Lithuania. Forested land consists of about 28 percent, with 2.17 million ha, while land classified as forest corresponds to about 30 percent of the total land area. The south-eastern part of the country is most heavily forested, and here forests cover about 45 percent of the land. The total land area under the state Forest Enterprises is divided into forest and non-forest land. Forestland is divided into forested and non-forested land. The total value added in the forest sector (including manufacture of furniture) reached LTL 4.9 billion in 2013 and was 10% higher than in 2012. According to the ownership forests are divided into state (1.08 million ha), private forests (0,85 million ha) and other ownership types (0.2 million ha).

According to the ownership right forests are divided in to: state forests – 1081 000 ha (49.7%), private forests - 858 000 ha (39.4%) and forest reserved for restriction 238 000 ha (10.9%).

Forest land is divided into four protection classes: reserves (2 %); ecological (5.8 %): protected (14.9 %); and commercial (77.3 %). In reserves all types of cuttings are prohibited. In national parks, clear cuttings are prohibited while thinning and sanitary cuttings are allowed. Clear cutting is permitted, however, with certain restrictions, in protected forests; and thinning as well. In commercial forests, there are almost no restrictions as to harvesting methods.

Lithuania is situated within the so-called mixed forest belt with a high percentage of broadleaves and mixed conifer-broadleaved stands. Most of the forests - especially spruce and birch - often grow in mixed stands. Pine forest is the most common forest type, covering about 38 percent of the forest area. Spruce and birch account for about 24 and 20 percent respectively. Alder forests make up about 12 percent of the forest area, which is high, and indicates the moisture quantity of the sites. Oak and ash can each be found on about 2 percent of the forest area. The area occupied by aspen stands is close to 3 percent

Lithuania has been a signatory of the CITES Convention since 2001. CITES requirements are respected in forest management, although there are no local tree and shrub species included in the CITES annexes.

All state-owned forests 1081 000 ha are FSC certified. In addition to state forest enterprise, 4 private forest managers are managing forests (35 869 ha) in accordance with FSC standard requirements.

Estonia

Estonia is a member of the European Union since 2004. The Estonian legislation is in compliance with the EU's legislative framework and directives. National legislative acts make references to the international framework. All legislation is drawn up within a democratic system, subject to free comment by all stakeholders. The Estonian legislation provides strict outlines in respect to the usage of forestry land and the Estonian Forestry Development Plan 2020 has clear objectives and strategies in place to ensure the forestland is protected up to the standards of sustainable forest management techniques.

The Ministry of the Environment coordinates the fulfilment of state duties in forestry. The implementation of environmental policies and its supervision are carried out by two separate entities operating under its governance. The Estonian Environmental Board monitors all of the work carried out in Estonia's forests whereas the Environmental Inspectorate exercises supervision in all areas of environmental protection.

The forest is defined in the Forest Act. There are three main forest categories described in this legislation: commercial forests, protection forests and protected forests. According to the ownership, forests are also divided into private forests, municipality forests and state-owned forests. The state owned forest represent approximately 40% of the total forest area and are certified according to FSC and PEFC forest management and chain of custody standards in which the indicators related to forest management planning, maps and availability of forest inventory records are being constantly evaluated and addressed . The state forest is managed by State Forest Management Centre (RMK) which is a profit-making state agency founded on the basis of the Forest Act and its main duty lies in a sustainable and efficient management of state forest. Overall there is 1 491 863 ha⁵ of FSC certified and 1 241 612 ha⁶ of PEFC certified forest.

Currently more than 2 232 000 ha, equal to 49,3% of the Estonian land territory, is covered by forest. According to FAO data, during 2000 - 2005, average annual change in the forest cover was +0.4 % . Forestry

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

Belarus

In Belarus, forestland covers 9.5 million ha. Forests are quite evenly spread over the country's six regions with the average value of the forest cover (ratio between the stocked forestland and the total land) being 39.3%. Area of Agricultural area 8.7 million ha.

The area covered by forest is increasing. The expansion happens both naturally and by afforestation of infertile land unsuitable for agriculture. Within the last decade, the timber production in Belorussia has fluctuated approx., 11 million cubic metres (<http://www.mlh.by>, 2015.)

Forest area of Belarus consists of Belarus consist of: forests- 7,89 million ha, Other wooded land 0.91 million ha. The main wood species in Belarus are: pine 50,4%, spruce 9,2%; birch 23,1%; black alder 3,3%; grey alder 3,3 %: aspen 2,1%; other species 3,3%.

The forests in the Republic of Belarus are state property. Forests under the jurisdiction of the Ministry of Forestry (Minleshoz) cover 86% of the forest fund. Besides, a significant share of the forest fund is managed by the Administration of the President of the Republic of Belarus (8%) and by the Ministry of Emergency Situations of the Republic of Belarus (2%).

In Belarus, an environmental protection system has been in place since 1960, from the time a Nature Protection Committee was established. Specially protected area accounts 7,7 % of the whole area of the country. However, together with the natural sites subject to special protection such as water conservation zones and areas of habit and growth of endangered wild animals and plant species, this figure increases to 22,1 % of the country's total area.

It is considered that about 75 % of the original Central European mixed forest cover is estimated to be lost. Pristine and relic stands of this forest type are believed to have been eliminated complete except in Belovezha Forest, which is located close to Belarus and Poland border. It is one of the largest and best presented forest tract in the lowlands Europe. It still contains a wide array of old-growth forest stands representing all the major habitat types, a rich variety of wildlife and a still not sufficiently studied numerous lower plants, fungi and slime moulds.

Belorussia has been a signatory of the CITES Convention since 1995. CITES requirements are respected in forest management, although there are no species included in the CITES lists in Belorussia.

Forest regeneration is carried out annually over an area of 32,000 ha, including 81% of the forest planting and seeding and 19% by natural regeneration. There are 2 strictly protected Nation reserves and 4 National parks present in Belarus at the moment. Area of National reserves accounts 2,98 million ha and area of National parks is 3,98 million ha.

Forestry and the forest industry are essential parts of the republic's economy. In Belarus wood-based industry consists of forestry (13.5% of all production), Roundwood processing (69,5 % of all production), pulp and paper (16,4 % of all production) sectors.

All forest area is certified by PEFC certification scheme: 7,7 million. ha (83 forestry) and FSC certification scheme 5,0 million. ha (61 forestry)

Norway

About 38% of the surface area in Norway is covered by forest. The total forested area amounts to 12 million hectares, including more than 7 million hectares of productive forest. 15% of the productive forest has been estimated as non-economic operational areas due to difficult terrain and long-distance transport, which means that economical forestry may only be operated in about 50% of the forested area. The most important species are Norway spruce (47%), Scots pine (33%) and birch (18%).

From the forest area: Privately owned forests 80 %; State and municipalities 12%.

Industrial private 4 %; Local common land 4 %

All productive forests in Norway are certified, i.e. 7.397.000 hectares (both FSC and PEFC). The number of certified forest owners is approximately 43.000 (private, municipalities, state).

Approximately 6.4% of mainland Norway has protected area status. In addition, 15,000 square km of Spitsbergen is designated as conservation area - national parks, nature reserves or other kinds of protected area cover 10-12% of the area of the remote islands.

The total number of species in Norway is estimated to be 45,000, of which approximately 33,000 are known and described. It exists information enough to estimate whether a species is threatened or not for only 10,000 species. Of these, 150 are threatened by extinction, 279 are deemed vulnerable, 800 are categorized as rare (the last number also includes species, which are rare of natural causes and not only because of human intervention). 359 are deemed species of special concern, 36 species are indeterminate, while 169 species are classified as insufficiently known.

Species "Red lists" can be used to point out the habitats containing an especially rich variety of endangered species. Red list species have often proved to be the red warning lights of nature to tell us that a biotope is threatened or something else is wrong in nature. The red lists also give us a picture of the condition of our flora and fauna and may contribute to the efforts of securing and improve the ecosystem for these species.
http://www.borealforest.org/world/world_norway.htm

In the country, there are areas of endangered high conservation value forests. More specifically, there are Global200 and IFL areas in the northern mountain regions.

Norway has been a signatory of the CITES Convention since 1976. CITES requirements are respected in forest management, although there are no local tree and brush species included in the CITES lists annexes.

Those regions identified by Conservation International as a Biodiversity Hotspot. Those forest, woodland, or mangrove ecoregions identified by World Wildlife Fund as a Global 200 Ecoregion and assessed by WWF as having a conservation status of endangered or critical. Those regions identified by the World Resources Institute as a Frontier Forest Intact Forests Landscapes, as identified by Greenpeace (www.intactforests.org)

In 2006 forestry and the forest industries accounted for about 0.8% of the Gross National Product in Norway. Of the total employment of 2.443.000 persons in Norway, approximately 40.000 people receive their income from forestry and from the forest industry. 6.700 persons (0.3%) are directly employed in forestry. About 50 percent of the Norwegian round wood harvested is used by sawmills. There are 225 sawmills in Norway operating on an industrial scale.

Sweden

The Swedish Forest Agency is the national authority responsible for forest matters. It seeks to ensure that the country's forests are managed in such a way that yields are plentiful and sustainable, while preserving biodiversity. The agency is also working to better understand the importance of the forest, including its value for outdoor recreation. The agency has offices throughout the country. Its main tasks are to advise on forest-related issues, to monitor compliance with the Forest Law, to provide services to the forest industry, to support nature conservation efforts and to carry out inventories. Sweden is the second largest afforested area in Europe after Russia. Sweden's productive forests cover about 23 million hectares. However, if this area is calculated according to international forest land definitions, it is 27 million hectares. The predominant species in Swedish forests are spruce and pine. These two species accounts for more than 80% of timber stocks. In northern Sweden, pine is the most common species, while in southern Sweden, spruce, mixed with some birches, predominates. Thanks to efficient and far-sighted forest management, Swedish timber stocks have increased by more than 60% over the last hundred years and now stand at 300 million m³. In recent years, the volume felled has been between 85 and 90 million m³, with an annual increase of around 120 million m³.

There are about 1.9 million hectares of protected forests in Sweden. To a large extent, about 90% of these forests are forests where small interventions are allowed. Strictly protected forests, which are not subject to human intervention, account for 0.3% of the forest area. National parks, nature reserves and nature reserves cover an area of 4.2 million hectares, i. 10% of Sweden's land area. There are at least 220.00 ha of protected forests that are still productive in terms of forest growth. In addition, there are about 12,000 ha of protected habitat types and 25,000 ha of wooded land set aside and protected by environmental agreements. Large areas of forest are also protected from voluntary activities of forest owners. Sweden 1974 August. signed the Convention on Endangered Species of Wild Fauna and Flora, and the Convention entered into force in 1975. in July. Sweden has also set up a national committee for the International Union for Conservation of Nature.

Families of private forest owners own about 50% of Sweden's forests, private forestry companies about 25%, and the state and other state owners own the remaining 25%. Swedish forest ownership varies from region to region. In the southern parts of the country, forests are mainly privately owned, while in northern Sweden companies manage more forests.

Focus on sustainable supply solutions 80% of Sweden's forest land is FSC-certified or PEFC-certified. FSC-certified forests cover 10.2 million hectares and PEFC-certified forests 7.5 million hectares. Out of a total of 7.5 million hectares certified under the PEFC scheme, 3 million hectares belong to the family.

Russia:

Forests cover 46.6% of the area of the Russian Federation, which is 1183.3 million hectares. The total area of FSC forestland on the territory of the Russian Federation is 764 million hectares, accounting for about 21% of world reserves of standing timber.

Forests are mainly boreal. Areas occupied by the main wood species plantations remain rather stable within last decades. Hardwood species compose 68.4%, softwood – 21,7%. Other wood species compose less than 1% of the forests.

The total reserve of the wood in the forests located on forest fund land is 80 billion m³. In accordance with Russian legislation, 100% of the forest fund land are state property. Legal entities can use forest areas in lease and short-term use. Lease relations are the dominant legal form of forests using. Allowable woodcutting area

in the Russian Federation is about 660 million m³, including softwood - 370 million m³. Using the allowable woodcutting area does not exceed 35% of the country territory.

According to Rosleskhoz (Russian Forestry), data the total recourses of increased volumes of cutting with the aim of cutting within the country is about 400 million m³ per year. High quality reproduction of forest resources and protective forestation is a prerequisite for use of forests. All reforestation activities in leased forest areas are planned and carried out by forest users at their own expense in accordance with the forest management projects. The main way of reforestation in the Russian Federation is the procurement of natural regeneration. Artificial reforestation is carried out by creating forest plantations: planting or seeding of forest plants in the region of the supply base where active wood-cutting is taking place. As well all forest users plan and implement a set of fire-prevention measures aimed at preventing and reducing the after-effects of forest fires in the summer period.

According to the forest, legislation of the Russian Federation the species listed in the Red Book shall be preserved as well as their habitats when harvesting. Banned is harvesting of precious, become extinct and specially protected wood species.

Forest complex of the Russian Federation, including the forestry and forest industry of harvesting and wood handling occupies an important place in the economy of the country. Products of forest complex are widely used in many industries, construction, agriculture, printing, trade and medicine.

The forest complex of the Russian Federation employs about 60 thousand of large, medium and small enterprises in all regions of the country.

The share of the forestry sector accounts 1.3% of GDP; 3.7% of the total industrial output, 2.4% of foreign profits in the scale of the Russian Federation. The total number of employees in the forest complex of Russia is about 1 million people.

From the total production of forest complex of the Russian Federation about 60% products are for the domestic market and 40% - for export.

Forest certification is an effective tool for combating against illegal harvesting and illegal wood trade. The forest certification FSC (Forest Stewardship Council) is widely used in Russia. The total area of FSC certified forests is 619 821.4 ha. Also, the certification system PEFC (Program for the Endorsement of Forest Certification Schemes) is used but less extensively. Certified forest area in Russia is about 40 million hectares, or 30% of the total number of forests under lease. Certified forests are located in 25 regions of Russia. The number of FM certificates on forest management is 121, the number of chain of custody certificate CoC is 320. Also, the number of certificates for controlled wood is growing steadily, according to recent data it was about 140. The dynamics of forest certification in Russia points to the ever-increasing activity of wood companies, which indicates to the responsibility to ensure the legality of wood harvested and compliance with environmental and other requirements.

Detailed information about the supply base region (general description of the forest resources and forest management practices within the Supply Base) is publicly available at the BP's homepage: <http://www.gairelita.lt>

5.3 Detailed description of Supply Base

Total Supply Base area (ha): 808,1 million ha (including Latvia, Lithuania, Belarus, Estonia, Sweden, Norway and whole area of Russia)

Tenure by type (ha): 791.66 million ha state ownership, 18,16 million ha private forests; other 0.28 million ha

Forest by type (ha): boreal 808,1

Forest by management type (ha): 808,1 million ha managed natural

Certified forest by scheme (ha): FSC, total certified area 59,51 million ha (FSC) and 18,13 million ha PEFC

Quantitative description of the Supply Base can be found in the Biomass Producer's Public Summary Report <http://www.gairelita.lt/>

Number of suppliers: 45

Controlled Feedstock 0%

SBP-compliant Primary Feedstock 0%

SBP-compliant Secondary Feedstock 92%

SBP-compliant Tertiary Feedstock 8%

SBP non-compliant Feedstock 0%

Species *Picea abies* (L.) H. Karst.; *Pinus sylvestris* (L.); *Alnus glutinosa* (L.) Gaertn.; *Alnus incana* (L.) Moench, *Populus tremula* (L.); *Betula pendula* (Roth); *Betula pubescens* (Ehrh.)

5.4 Chain of Custody system

The Organisation is holding valid FSC Chain of Custody and FSC Controlled wood certificate. Valid FSC system description and other documents exist.

The Organisation is implementing FSC credit system. FSC Credit system is used for materials received as FSC certified, PEFC certified, FSC Controlled wood and feedstock verified according to the Organisation's own Controlled wood verification system. The Controlled wood system or the organisation is covering only Latvia and Lithuania. Feedstock from Norway, Sweden, Estonia, Belarus and Russia is delivered by FSC certified suppliers and are coming with FSC certification claim. Supplier list is maintained. The BP was FSC assessed in September 2015.

After the reception, incoming feedstock and unloaded into piles according to type of feedstock and load is registered into the recordkeeping system. For the credit account purposed, the volume of feedstock is recalculated into the sawdust and then into the tons based on the conversion factors and volume into tons recalculation coefficient. It is designated into the procedures, that FSC credit account is updated once in a month: with the data about the raw material, reception and pellets sold with the SBP claim.

In case of the FSC and / or SBP sales, the volume of sold pellets is withdrawn from the credit account.

6 Evaluation process

6.1 Timing of evaluation activities

Activity	Location	Date/time
Energy use calculations, documents and procedures review	NEPCon office	06/10/2020 9:00 – 13:00
Opening meeting	Office	13/10/2020 9:00-9:15
Documents and procedures review Inputs and outputs review	Office	9:15-11:00
Supplier verification audit (Lithuania)	UAB Sedaras UAB Kaimelis LT	11:00-14:00
Energy use calculations review	Office	14/10/2020 09:00 – 12:30
Chain of custody review (site tour), interview with responsible persons	Production site and office	12:30-13:15
Staff interviews	Production site and office	13:15-15:00
Closing meeting	Office	15:00 – 15:30
Supplier verification audit (Latvia)	SIA KMD Baltic SIA SQA Latvijas Finieris AS	16,26/10/2020

6.2 Description of evaluation activities

Auditor(s), roles	Qualifications
Povilas Misierauskas	P. Misierauskas is NEPCon certification manager (auditor – apprentice). P. Misierauskas hold Bachelor degree in Ecology and Environment and Master in Forest Ecology. He graduated from the Lithuanian University of

Lead auditor Evaluation against all applicable requirements	Agriculture. Mr Misierauskas taught laboratory work to Forest Ecology faculty dendrology discipline's students Forest Ecology faculty, implemented planting and green space inventory. He assessed green areas in 22 town and region municipalities. P. Misierauskas has a lot of experience in assessing preserved trees, identifying their state and value and implementing dendrological (decorative trees and bushes) expertise. He has been working as certification manager at NEPCon since 2013. Completed SBP auditor training course and acquired SBP auditor qualification in 2020.
Girts Karss Auditor Suppliers evaluation in Latvia	Girts Karss. Works for NEPCon since 2011. Girts Karss holds MSc in Environmental Science from the Lund University and the University of Latvia. He has passed the Rainforest Alliance lead assessor training course in FSC Forest Management and FSC Chain of Custody certification systems and obtained the FSC lead auditor qualification. In addition, he got the SBP lead auditor qualification. Girts Karss has participated in a number of FSC forest management and SBP assessments and annual audits.

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>

The audit 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:

October 13-14, 2020.

Auditor was welcomed in UAB Gairelita office in Radviliškis. Auditors started with an opening meeting attended by Economic Consultant and Financial Director. Auditor provided information about audit plan, methodology, auditor qualification, confidentiality issues, auditing methodology and clarified the audit scope.

During the audit, the auditor evaluated existing production. After that auditor went through all applicable requirements of the SBP standards No. 2, 4, 5, existing chain of custody and management system, CoC, record keeping / mass balance requirements, emission, energy data, and categorisation of input and verification of SBP compliant feedstock/ biomass. During the process, overall responsible person for SBP system and over responsible staff having key responsibilities within the system were interviewed.

After a roundtrip around BP's pellet production was undertaken. During the site tour applicable records were reviewed, production staff was interviewed. At the end of the day the preliminary results were presented.

October 13, 2020.

Two local suppliers from Lithuania (UAB Sedaras and UAB Kaimelis LT) were visited and inspected. During the supplier audits, auditor observed the audit methodology of the supplier audits conducted by the BP team. For sampling details see the finding 1.4 Appendix A.

October 16, 26, 2020

Three local suppliers from Latvia (SIA KMD Baltic, SIA SQA, Latvijas Finieris AS) were visited and inspected. During the supplier audits, auditor observed the audit methodology of the supplier audits conducted by the BP team. For sampling details see the finding 1.4 Appendix A

6.3 Process for consultation with stakeholders

The stakeholder consultation was carried out on 2 of September 2020 by sending direct email to different stakeholder categories: state institutions, local NGOs, authorities, government bodies, forest owners associations, academic and research institutions. No comments from the stakeholders were received. The stakeholder notification letter is added as an Exhibit to this report.

7 Results

7.1 Main strengths and weaknesses

Strength: SBP system elements are implemented at the time of the audit. Use of the FSC credit system. Efficient record keeping system. Small number of the management staff and clearly designated responsibilities within the staff members.

Weaknesses: Nevertheless, of the good performance this year, the company has to deal with reputation issue, which was damaged 4 years ago, when the big fire and the death of production manager took place in the company's premises.

7.2 Rigour of Supply Base Evaluation

Not applicable

7.3 Collection and Communication of Data

BP has a system to gather and record Greenhouse Gas emissions. During the audit, BP made detailed overview of the systems and databases to gather and record such data. Evidence was provided to auditors.

7.4 Competency of involved personnel

The SBP responsible person was supported by external consultant who was closely involved in helping to set up and maintain the management system. The SBP responsible staff has shown good understanding of the requirements in relation to SBP certification and of the FSC CoC system. The following positions of the staff are mainly involved into the SBP system management: Economic Consultant, Director, Financial Director, accountant.

Overall responsible person has all required competences, education and work experience from timber and industry sector, but these requirements are not described in procedures.

According to interviews, review of biomass producer sales manager's CV and set of procedures and documents that were composed for the SBP system, auditors evaluated the competency of main responsible staff to be sufficient.

7.5 Stakeholder feedback

No comments or concerns were received during the Biomass Producer's and CB-s stakeholder notification period.

7.6 Preconditions

No open preconditions.

8 Review of Company's Risk Assessments

Describe how the Certification Body assessed risk for the Indicators. Summarise the CB's final risk ratings in Table 1, together with the Company's final risk ratings. Default for each indicator is 'Low', click on the rating to change. Note: this summary should show the risk ratings before AND after the SVP has been performed and after any mitigation measures have been implemented.

Not applicable

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 01/19	NC Grading: Minor
Standard & Requirement:	Standard #2: Verification of SBP-compliant feedstock The BP shall record the place of harvesting and the identity of the primary wood processor responsible for the supply of inputs classified as SBP-compliant Secondary Feedstock. (6.2)
Description of Non-conformance and Related Evidence:	
BP has 44 secondary suppliers, out of which 22 are secondary producers and 22 – primary producers. During the auditing period 10 secondary suppliers were changed (new). Supplier list is available. The information about the raw material origin is collected through the supplier origin declaration and is confirmed based on the supplier audits. The same suppliers provide feedstock for drier (FSC Mix Credit and FSC Controlled wood). According the SBP procedures origin declaration shall be signed with every supplier and supplier audits shall be conducted for all suppliers at least once in a year. It was confirmed during the audit that supplier origin declarations (Exh. 13) are signed with all the suppliers included in the supplier list of the company. During the audit supplier verification audits were done for 2 suppliers from Lithuania and 3 suppliers from Latvia. During the audit checking the supplier verification audit reports it was noticed that not all secondary suppliers were verified during the auditing period as it is foreseen in SBP procedures. Considering that the origin was not yet re-confirmed and demonstrated for all secondary feedstock suppliers and that BP plans till the end of this year to complete the supplier verification program, the auditor decided to rise minor non-conformance.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Supplier's origin declarations, supplier's verification audit reports, training documents
Findings for Evaluation of Evidence:	During the audit company provided list of feedstock suppliers (total 45). During the auditing period 1 secondary supplier was included. All signed supplier's origin declarations were available during the audit as well as supplier's verification audit reports. During the audit supplier verification audits were done for 2 suppliers from Lithuania and 3 suppliers from Latvia. Through documentation and interviews with supplier's representatives it was confirmed that origin of the feedstock matches the origin declaration they signed. During the auditing period additional training for responsible employees and root causes analyze was conducted (Exh.9). It was found that this requirement was not emphasized by their consultant and they were planning to conduct rest of the suppliers verification audits by the end of 2019. Interview with the

	client has shown that this standard requirement after training is known and will be implemented during next audits.
NC Status:	Closed

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):	Asko Lust
Date of decision:	10/Nov/2020
Other comments:	