



NEPCon Evaluation of GLHU Stolbtsovski leshoz 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*

Document history

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1 Overview

CB Name and contact:	NEPCon OÜ, Filosoofi 31, 50108 Tartu, Estonia
Primary contact for SBP:	Ondrej Tarabus otarabus@nepcon.org, +34 605 638 383
Current report completion date:	04/Dec/2020
Report authors:	Siarhei Minkevich
Name of the Company:	GLHU Stolbtsovski leshoz. Pellet plant and Central office: 17 Sentiabria Street, 15, Stolbtsy town, Minsk Region, Republic of Belarus
Company contact for SBP:	Lamaka Andrei Mechislavovich, Engineer of Certification and Standartization. Phone: +375-1717-78837; email: stolbzyles@tut.by.
Certified Supply Base:	The area managed by GLHU Stolbtsovski leshoz, Republic of Belarus
SBP Certificate Code:	SBP-01-52
Date of certificate issue:	18/Nov/2016
Date of certificate expiry:	17/Nov/2021

This report relates to the Fourth Surveillance Audit

2 Scope of the evaluation and SBP certificate

Scope of certificate includes production of wood pellets for use in energy production and its transportation by different means of transport to different end points in Belarus. 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. 1.1.

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

GLHU Stolbtsovski leshoz is a state forest management institution who manages state forests. The area of the forest fund managed by the GLHU Stolbtsovski leshoz of Minsk State Forestry Board is 90033 ha.

GLHU Stolbtsovski leshoz has sawmill plant as well as pellet plant located at the same production site where sawmill plant of leshoz works. Pellet plant uses sawmill residues from their sawmill: sawdust (feedstock). During the reporting period firewood, slabs and sawdust were used as biofuel that originates from the state forest fund of GLHU Stolbtsovski leshoz. Therefore, the feedstock for pellet production - sawdust comes from the sawmill plant and firewood, slabs from leshoz' forest fund. The supply base is forest fund of GLHU Stolbtsovski leshoz. In this reporting period feedstock was received only from the forest fund of GLHU Stolbtsovski leshoz. The pellet plant has the production capacity of 4000 tonnes pellets/year.

GLHU Stolbtsovski leshoz (biomass producer, BP) is forest management institution, located in Minsk region, Belarus, has more than 300 staff members. The BP holds valid FSC FM/CoC certificate covering round wood, firewood, sawmill products, chips, fuel pellets, and for biomass production uses only 100% PEFC-certified and FSC 100%certified feedstock (Biomass is delivered to the customer by means of railway service (railway wagons). Occasionally the deliveries can be made by the trucks (however it is not common mean of deliveries for export, but more typical transport for the internal market).

5.2 Description of Company's Supply Base

GLHU Stolbtsovski leshoz is a state forestry institution that manages the forest fund and has its own sawmill plant and small pellet production. Production of fuel pellets is located at the following address: 17 Sentiabria Street, 15, Stolbtsy, Minsk region, Republic of Belarus.

The supply base of the organization is the total territory of Stolbtsovski leshoz.

Forests are the dominant vegetation type on the territory of the Supply Base. The structure of the FME includes Okinchitskoe, Opechkovskoe, Prudskoe, Nalibokskoe, Kulskoe, Kletischenskoe, Rubezhovichskoe, Starinskoe and Hotovskoe forestry areas and the logging unit. The FME is located in the western part of the Minsk region, within the Stolbtsy administrative district. The total area of the FME is 90,033 hectares, including 83,000 hectares covered with forest.

The main forest forming breed in the forest fund of Stolbtsovsky forest farm is Pinus, which occupies 61.7% of the forest-covered land. Less represented are Picea, Betula and Alnus glutinosa, occupying respectively 12%, 15.5% and 9.3% of the forest-covered area. The distribution of the forest by the prevailing species is as follows: Pinus - 61.7%, Picea - 12%, Quercus - 0.5%, Fraxinus - 0.1%, Betula - 15.5%, Populus tremula - 0.6%, Alnus glutinosa - 9.3%. The total share of conifers is 73.7%, hardwood - 0.8%, softwood - 25.5%.

The most common is the mossy group of forest types, which occupies 34.5% of the forest area covered, slightly less represented by the blueberry (14.9%), brackish (20.3%) and fern (8.9%) groups of forest types. All of them are characterized by quite high productivity with optimal selection of the main species.

Much less productive are the forests belonging to the following groups of forest types: sedge (3.3%), lingonberry (0.4%), long-billed (2.3%), which are usually represented by native forest-forming rocks and are not subject to reconstruction.

In spring, all cut down areas are planted with forest crops or left for natural infestation. All established young forests are taken care of annually.

The main purpose of forest management of Stolbtsovsky leskhoz is the organization of continuous, sustainable, economically efficient, multi-purpose, environmentally responsible, socially oriented forest management and forest use to meet the needs of society in raw material resources of the forest, taking into account the preservation and strengthening of ecological functions of the forest and the conservation of biological diversity of forest biocenoses.

On the territory of Stolbtsovsky leskhoz there are specially protected areas such as Reserve of national importance: Landscape Reserve "Naliboksky". Natural Monument of Republican Importance: Botanical Nature Monument "F.E. Dzerzhinsky Estate with the Adjacent Forest Plot". Natural monuments of local importance: Botanical nature monument "Sula" park. Hydrological natural monument: "Sudnitsa springs", spring "Krasny".

Great importance in the forest is given to the conservation of rare and endangered species of plants and animals. For each species of these plants and animals there are protection obligations. Data on rare species are recorded in the passports of rounds, indicating their habitats. Leskhoz implements all necessary measures to ensure the conservation of rare and endangered plant and animal species.

Among the animals listed in the Red Book of Belarus in the territory of Stolbtsovsky leskhoz there are: Black Apollo, Grey Crane, Pustilga, Badger, White Spined Woodpecker, Little Eagle.

On the territory of Stolbtsovsky Forestry there are no endangered species of animals and plants according to CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora).

Sawdust from own production (SBP compliant secondary feedstock), firewood (SBP compliant primary feedstock), sawmill waste is used for pellets production.

SBP product group	% in the total supply	Number of suppliers	Trees species composition
Controlled feedstock	%	0	-
SBP-compliant primary feedstock	%	-	-
SBP-compliant secondary feedstock	100%	Residues of own wood processing	10% Norway Spruce, 90% Scots Pine
SBP-compliant tertiary feedstock	%	-	-
SBP-non-compliant feedstock	%	-	-

5.3 Detailed description of Supply Base

Total Supply Base area (ha):	90033 ha
Tenure by type (ha):	90033 ha: state owned
Forest by type (ha):	temperate 90033 ha
Forest by management type (ha):	managed natural 90033 ha
Certified forest by scheme (ha):	90033 ha FSC-certified forest 90033 ha PEFC certified forest

Detailed information about BP's supply base may be found in their Supply Base Report available in Internet at <http://stolbzyles.by/sertifikaciya/> and will be uploaded to SBP website in company profile as SBP certificate holder.

5.4 Chain of Custody system

BP (GLHU Stolbtsovski leshoz) holds two PEFC certificates:

PEFC FM certificate <https://www.pefc.org/find-certified/company/954414> (BY/112 08.01.075.00112) (Participant in Group Certification FM), as well as Individual Certificate CoC (BY/112.08.02.075.00890) <https://www.pefc.org/find-certified/company/1018510> covering logging, also primary (round timber sawmill processing) as well as secondary (chips and pellets production) wood processing.

BP holds valid FSC FM/CoC Certificate:

<https://info.fsc.org/details.php?id=a023300000ayiWtAAI&type=certificate> (NC-FM/COC-017322) covering logging, also primary (round timber sawmill processing) as well as secondary (chips and pellets production) wood processing.

Secondary feedstock (sawdust) and biofuel (sawdust, slabs, round firewood) with FSC 100% claim and 100% certified PEFC claim is used for pellet production and FSC transfer system / PEFC transfer system of claims is implemented. No need in physical segregation of wood material as all material is PEFC certified (also FSC certified).

6 Evaluation process

6.1 Timing of evaluation activities

Due to coronavirus and illnesses among organisation' staff the onsite audit was conducted during several days in August and September 2020, see below in the table (app. 9 working hours). Audit activities included documents review at office, inspection of production facilities and staff interviews.

Activity	Location	Date/time
Document review	Review of submitted documentation	18/08/2020 09.00-11.00
Opening meeting	Office	18/08/2020 09.30-09.45
Chain of custody review (site tour); staff interview; document review	Production facilities	18/08/2020 09.45-13.00
Documents and procedures review (feedstock inputs, SBR, CoC control system and critical points, compliance with legal requirements, H&S), staff interview.	Office	08/09/2020 14.00-16.00
Documents and procedures review (SAR and energy use primary data); staff interview	Office	08/09/2020 16.00-16.45
Closing meeting	Office	08/09/2020 16.45-17.15

6.2 Description of evaluation activities

Composition of audit team:

Auditor(s), roles	Qualifications
Siarhei Minkevich, SBP auditor	NEPCon SBP lead auditor, FSC FM/COC and FSC CoC/CW lead auditor. He has successfully passed SBP lead auditor training in Germany in September 2019 and participated in several SBP assessments in Belarus and Lithuania.

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

Description of the audit evaluation:

All SBP related documentation connected to the SBP as well as FSC CoC and FSC PEFC system of the organisation, including SBP Procedure, SAR and GHG data calculations, Supply Base Report, FSC and PEFC system description was provided by the company in the beginning of the assessment, which started with an opening meeting attended by the representatives from Organisation's management and staff.

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

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

After that auditor went through all applicable requirements of the SBP standards nr. 2, 4, 5 and instruction document 5E covering input clarification, existing chain of custody system, management system, CoC, recordkeeping/mass balance requirements, emission and energy data and categorisation of input and verification of SBP-compliant biomass. During the process, overall responsible person for SBP system and other staff were interviewed.

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

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

6.3 Process for consultation with stakeholders

The stakeholder consultation was carried out before main assessment in 2016 by sending direct email to different stakeholder categories (more than 120 recipients) (List of SHs proposed by FSC Belarus was used). List of informed stakeholders includes such groups of stakeholders as FSC National Initiative, environmental and social NGOs, FSC-certified companies in the region, scientific and educational entities, state forestry authorities, trade unions etc.

It was not required before this audit to carry out SH consultation. No comments from the stakeholders have been received before the audit 2020.

7 Results

7.1 Main strengths and weaknesses

Strengths: use both CoC systems: FSC transfer, PEFC transfer; FSC 100% and 100% certified PEFC secondary feedstock is sourced. Effective recordkeeping system. Well structured management staff (divisions and departments, etc) and clearly designated responsibilities within the staff members.

Weaknesses: please see minor NCR 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: electricity for pellet production; biofuel for burner; diesel for feedstock handling; diesel for biomass handling (from production line to warehouse), shipping and transportation to customer. Diesel consumption value by vehicles used at pellet plant is based on calculation of fuel consumption per vehicle and data obtained in accountancy; electricity consumption value by pellet plant is based on invoices issued by electricity supplier on a monthly basis.

7.4 Competency of involved personnel

Overall, BP staff showed good understanding of knowledge of all applicable SBP requirements. Several staff members are involved into SBP certification: chief engineer (SBP responsible person) (complaints, SBP procedures and systems updates, SAR data); quality engineer (responsible for SBP procedures updates, SAR), chief manager of the sawmill plant (including pellet production) (conversion factor updates, overall control of the production and material flows), manager of export sales (DTS), accountant of the sawmill plant (including pellet production) (accounting system, sales for internal market), head of forestry department (SBR), operators of pellet production (SAR data), engineer of energy (SAR data), master of the production (SAR data, overall control of pellet production, including H&S issues on daily basis), H&S engineer (H&S requirements), head of planning and economic department (SAR data (fuel)). Prior to SBP assessment 2016, BP was supported by external consultant, who also has provided relevant training to BP staff. Prior to this SBP audit 2020, BP was supported by representatives from a consulting company (assistance in SAR data gathering and analysis).

7.5 Stakeholder feedback

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

7.6 Preconditions

None

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 01/20	NC Grading: Minor
Standard & Requirement:	<p>SBP Instruction Document 5E V.1.1, 6.9.3 At least one of the following options shall be used for the drying process, where applicable:</p> <p>Option 1 – Specify energy use of dryer, when applicable.</p> <ul style="list-style-type: none"> - 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. <p>Option 2 – Specify input moisture content of feedstock.</p> <ul style="list-style-type: none"> - 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, and the justification shall be recorded in the SAR.
Description of Non-conformance and Related Evidence:	
<p>The office of the organization has data on the assessment of the moisture content of the pellets. There is a logbook for registering the results of moisture measurements, the data are also provided in electronic form in Excel format. According to the staff, several measurements (repetitions) are performed during one shift (raw materials before drying, after drying and finished granules). During the audit, it was found that there are errors in the calculations of the average moisture content (the average value is calculated “manually”, the calculation is not automated). Errors in measuring the moisture content of raw materials influenced the calculated values of the tonnage of the used raw materials, in fact, the values of raw materials are underestimated (according to the value of conditionally dry wood). The data for evaluating the moisture</p>	

content of raw materials after drying is correct. The data on the moisture content of biofuel is recorded, in fact, by default (the moisture content of 19.74% is the same for firewood and slab), no evidence of measuring the moisture content of round firewood is provided (data on the obtained values of slab moisture do not confirm the average value of 19.74%). The obtained values of the moisture content of the firewood are actually the data taken "by default". The auditor raised a minor nonconformance, since in general the organization has implemented a system for assessing the moisture content of raw materials, finished pellets.

В офисе организации имеются данные по оценке влажности пеллет. Имеется журнал регистрации результатов измерений влажности, данные также предоставлены в электронном виде в формате Excel. Со слов работников – выполняется несколько измерений (повторений) в течение одной смены (сырье до сушки, после сушки и готовые гранулы). В процессе аудита установлено, что в расчетах средней величины влажности имеются ошибки (средняя величина рассчитывается «вручную», расчет не автоматизирован). Ошибки в измерении влажности сырья повлияли на рассчитанные значения тоннажа использованного сырья, фактически, значения сырья занижены (по значению условно сухой древесины). Данные по оценке влажности сырья после сушки корректны. Данные по влажности биотоплива записаны, фактически, по умолчанию (влажность 19,74% одинаковая для дров и горбыля), свидетельства измерения влажности дров круглых не предоставлены (данные по полученным значениям влажности горбыля не подтверждают среднее значение 19,74%). Полученные значения влажности дров – это фактически данные, взятые «по умолчанию». Аудитор составил отчет о незначительном несоответствии, так как в целом в организации внедрена система оценки влажности сырья, готовых пеллет.

Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date До следующего ежегодного аудита, но не позднее 12 месяцев с даты утверждения отчета
Evidence Provided by Company to close NC:	-
Findings for Evaluation of Evidence:	-
NC Status:	Open

NC number 02/20	NC Grading: Minor
Standard & Requirement:	Standard 2: Verification of SBP-compliant feedstock V1.0, 15.3 The BP management system shall document all necessary procedures.
Description of Non-conformance and Related Evidence:	
The organization has provided the SBP Procedure. The document has not been completely updated, in particular, outdated information is contained in annex 4, annex 1 to the SBP Procedure. Организация предоставила SBP Процедуру. Документ не был полностью обновлен, в частности устаревшая информация содержится в приложении 4, приложении 1 к SBP Процедуре.	

Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date До следующего ежегодного аудита, но не позднее 12 месяцев с даты утверждения отчета
Evidence Provided by Company to close NC:	-
Findings for Evaluation of Evidence:	-
NC Status:	Open

NC number 03/20	NC Grading: Minor
Standard & Requirement:	SBP Framework Standard 4: Chain of Custody V1.0, Instruction Note 4B on SBP Trademark use, 1.7 Only the SBP logo artwork provided directly from the SBP secretariat shall be used.
Description of Non-conformance and Related Evidence:	
<p>The organization has posted the trademark on the website under Certification webpage. The organization has previously changed the SBP responsible staff. No evidence provided that the trademark was agreed and received from the SBP secretariat.</p> <p>Организация разместила товарный знак на вебсайте в разделе Сертификация. В организации ранее поменялся SBP ответственный сотрудник. Не предоставлено свидетельств того, что товарный знак был согласован и получен из SBP секретариата.</p>	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date До следующего ежегодного аудита, но не позднее 12 месяцев с даты утверждения отчета
Evidence Provided by Company to close NC:	-
Findings for Evaluation of Evidence:	-
NC Status:	Open

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):	Nikolai Tochilov
Date of decision:	04/Dec/2020
Other comments:	<i>Click or tap here to enter text.</i>