



Forest Certification LLC Evaluation of Verhovazhsky branch Holbit LLC Compliance with the SBP Framework: Public Summary Report

Main (Initial) Audit

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

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

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1 Overview

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Current report completion date: 02/Jan/2021

Report authors: Stashkevich Nikolai

Name of the Company: Verhovazhsky branch Holbit LLC, 162313, Russia, Vologda region, Verhovazhsky district, Chushevicy village, Komsomolskaya str., 1

Company contact for SBP: Vinogradova Tatyana, Deputy Director on purchasing, e-mail: holbit@mail.ru, +79212339652

Certified Supply Base: Vologda region, Russian Federation

SBP Certificate Code: SBP-09-07

Date of certificate issue: 14/Jan/2021

Date of certificate expiry: 13/Jan/2026

This report relates to the Main (Initial) Audit

2 Scope of the evaluation and SBP certificate

The scope of evaluation and the certificate scope covers the office and the production site, located in the village Kamenka of the Vologda region of Russia.

Scope description: Production of wood pellets in Kamenka village, Vologda region, Russia, for use in energy production. Post production end points – factory gate, sea port Saint – Petersburg, Russia (FCA); big bags with pellets are delivered to the port by trucks. The certificate scope includes communication of Dynamic Batch Sustainability Data. The certificate scope 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.

The scope of the evaluation covered:

- Review of the BP's management procedures;
- Review of the production processes, production site visit;
- Review of FSC system control points, analysis of the existing FSC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients;
- GHG data collection analysis
- Assess compliance against Instruction Document 5E: Collection and Communication of Energy and Carbon Data (Version 1.1 November 2019).

4 SBP Standards utilised

4.1 SBP Standards utilised

Please select all SBP Standards used during this evaluation. All Standards can be accessed and downloaded from <https://sbp-cert.org/documents/standards-documents/standards>

- SBP Framework Standard 1: Feedstock Compliance Standard (Version 1.0, 26 March 2015)
- SBP Framework Standard 2: Verification of SBP-compliant Feedstock (Version 1.0, 26 March 2015)
- SBP Framework Standard 4: Chain of Custody (Version 1.0, 26 March 2015)
- SBP Framework Standard 5: Collection and Communication of Data (Version 1.0, 26 March 2015)

4.2 SBP-endorsed Regional Risk Assessment

Not applicable.

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

Holbit LLC Verhovazhsky branch is a primary producer located in the Kamenka village in the Vologda region of Russia. Holbit LLC has 3 sites according to valid FSC COC certificate: production site in Turovets village, Vologda region, production site in Kamenka village, Vologda region and railway dead end in Sokol city, but just single production site in Kamenka village (Verhovazhsky branch) is declared in the scope of SBP certification.

The company was registered in 2003.

For pellet production, the company uses its own FSC 100% and purchased (from certified suppliers) FSC 100% pulpwood of coniferous species and waste from its own sawmill production (sawdust and wood chips) classified respectively as SBP-compliant primary and secondary feedstock.

Holbit LLC has valid FSC-certificates: FC-FM/COC-643394 and FC-COC-643395.

The company uses a transfer control system according to applicable FSC scheme.

According to the Chain of Custody Procedure Holbit LLC (FSC), the comments of the interviewed responsible employees and the results of the timber warehouse inspection, only FSC-certified feedstock from its own leased forest areas and from FSC-certified suppliers is delivered to the production site (to Kamenka; Verhovazhsky branch). So the risk of mixture with non-certified feedstock is minimized.

Accounting for the volume of raw materials, products, energy consumption, fuel usage is carried out within the Excel-files and 1C accounting software.

The sold products are transported by trucks in big bags to the Morskoy port Saint – Petersburg, Russia (FCA).

5.2 Description of Company's Supply Base

The supply base of Holbit LLC is located on the territory of 3 forest districts (Mezhdurechenskoye, Sokolskoye and Totemskoye) and 3 administrative districts (Mezhdurechensky, Sokolsky and Totemsky) of the Vologda region in the North-Western Federal district of the Russian Federation. The supply base of the Verhovazhsky branch of Holbit LLC is located in the Totemsky district of the Vologda region. The company postulates that in the future it is possible to expand the resource base of suppliers within specified regions of Russian Federation. The total supply base area is 151 012,9 ha (total area of company's FSC-certified forests) – SBP-compliant primary feedstock. Forests are 100% boreal.

SBR provides for the use of waste (chips and sawdust) of its own sawmill, where the FSC 100% feedstock is processed – SBP-compliant secondary feedstock is also used in pellet production.

Tertiary feedstock is not applicable.

Within the supply base, forest management practices are based on achieving renewable sustainable forest management in accordance with the requirements of forest legislation and the principles of forest certification.

Holbit LLC does not procure tree species listed in the Red Book or CITES list.

In accordance with the legislation of the Russian Federation, all forest lands are state-owned. Legal entities can use forest areas in lease and short-term use. Lease relations are the dominant legal form of forest use.

The lease term may continue up to 49 years. Forest areas for a lease are subject to state expertise and cadastral registration. According to the Forest Code of the Russian Federation each forest user taking a lease forest land obliges:

- to carry out the activities on protection and reproduction of forests;
- to submit annual forest declaration;
- to issue a project of forest assimilation;
- to provide a report on the use of forests, their protection and reproduction.

5.3 Detailed description of Supply Base

Total Supply Base area (ha): 151 012,9 (total area of certified forests of company).

Tenure by type (ha): 151 012,9 (state owned).

Forest by type (ha): 151 012,9 (boreal)

Forest by management type (ha): 151 012,9 (managed natural)

Certified forest by scheme (ha): 151 012,9 (FSC certified forest).

Detailed information about BP's supply base may be found in their SBR available on the official site:

<https://holbit.ru/o-kompanii/informacija-dlja-zainteresovannyh-storon/>

5.4 Chain of Custody system

The Organization implements the FSC transfer system with biomass (pellets) production in the scope of the FSC certificate (FC-COC-643395).

(<https://info.fsc.org/details.php?id=a023300000dpTFuAAM&type=certificate>).

The process covers biomass production. See more explanations in 5.1 above.

6 Evaluation process

6.1 Timing of evaluation activities

Onsite main assessment was conducted on 23-24.11.2020 (16 h). Assessment activities included documents review at office, inspection of production facilities and staff interviews.

<i>Date</i>	<i>Activities</i>	<i>Location</i>
23-24.11.2020	<ul style="list-style-type: none"> • Opening meeting. • Interviews with management and leading specialists of the enterprise. • Analysis of the resource base report. • Analysis of the internal documentation of the enterprise developed as part of the SBP certification. • Visiting the production site of the enterprise, places of acceptance, storage, processing of incoming raw materials and manufactured products. • Validation of an SBP enterprise supply chain system. • Interviews with employees. • Work with enterprise documentation. Fill out a checklist for applicable SBP certification standards. • Validation of the collection of SBP data on GHG, energy, carbon and stability characteristics. • Preparation of preliminary audit findings. • Closing meeting. Summing up the preliminary results of the audit. 	Office, production site

6.2 Description of evaluation activities

Composition of audit team:

Auditor(s), role	Qualifications
Stashkevich Nikolai, audit team leader	Forest Certification SBP lead auditor. He has successfully passed SBP auditor training in Berlin on 3-4 September 2019. Auditor had more than 100 audit-days in each of last years (2016-2019) on FSC and PEFC as a lead auditor or as an auditor (without desk-audits). SBP accreditation audit has been successfully completed.

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

Description of the audit evaluation:

All SBP related documentation connected to the SBP as well as FSC CoC system of the organisation, including SBP Procedure, SAR and GHG data calculations, Supply Base Report and FSC system description was provided by the company prior to the assessment and lead auditor had enough time to review it and get well prepared for onsite visit. Assessment started with an opening meeting attended by the representatives from Organisation's management and staff.

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

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

Next, an inspection of the feedstock warehouse, production site and biomass warehouse was carried out. During the site tour, applicable records were reviewed, staff was interviewed and FSC system critical control points were analysed.

At the closing meeting findings were summarised and assessment were provided to the management and SBP responsible person.

Impartiality commitment: Please see Forest certification LLC impartiality commitment on the web-site https://en.fcert.ru/about/conflict_of_interests/

6.3 Process for consultation with stakeholders

12/10/2020 the information letter (e-mail) was sent to the stakeholders. 14 stakeholders were informed about the assessment. No feedback has been received from them. List of informed stakeholders includes such groups of stakeholders as FSC Russia, FSC-certified companies in the region, scientific and educational entities, state forestry authorities, etc

7 Results

7.1 Main strengths and weaknesses

Strength: Effective work according to FSC requirements. The use of only certified raw materials for the production of pellets, its transportation to the port without other loading / unloading / storage points allows to minimize the risks of mixing pellets with unacceptable materials. Effective recordkeeping system.

Weaknesses: not all SBP requirements are taken into account in internal procedures and communicated to regular omissions in compliance with OHAS requirements (MC-01), responsible employees (C-02), not all account data are sufficiently detailed (C-03, C-04), accurate and taken into account (C-05).

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 feedstock transportation and pellet production; diesel for pellet handling and transportation to the seaport; feedstock fuel (saw mill residues) for burner (for drying).

Data on the volume of raw materials, on the output of pellets, on their moisture content, on transportation distances, on electricity use and diesel consumption are recorded in corresponding excel-files - all data are summarized for each month, some data are registered daily.

Information on volumes is taken into account in the trade and transport documentation, summarized in the 1C accounting software.

The specifics of the production process are fixed in the approved documents (for example, signed Technological map of the production of pellets from sawmilling and woodworking waste (sawdust and lumpy waste)).

During the three-day production, the organization measured the electricity consumption (by meters) considering the used transformer substations and equipment. Based on the measurements obtained, the electricity consumption for the production of 1 ton of pellets was calculated. The corresponding detailed justification was signed by the chief power engineer. For the value presented in SAR, the electricity consumption per ton was multiplied by the total biomass produced.

The organization conducts a daily (2 times a day) moisture measurement: chips (wet), sawdust (wet), chips+sawdust (dry), pellets - the corresponding accounting sheets have been demonstrated. The results are summarized; average monthly values are registered in the summary Excel file. The interviewed operator explained the procedure for measuring moisture content, filling out the accounting forms and demonstrated the moisture meter used. Holbit LLC ordered the testing of pellet samples, incl. for moisture content, from an expert organization - the corresponding values are presented in the form of separate test certificates

The accounting of diesel fuel consumption is also registered in the summary excel file:

- the fixed consumption of diesel fuel for the operation of loaders is considered (big bags are moved to the warehouse), taking into account the time of their operation. The excel file gives a flow rate of 4.5 l/h, according to the link of the organization - 4.6 l/h; for the reporting period, there may be an error of 44 liters;

- the average consumption of diesel fuel for the transportation of pellets by trucks to the port is taken into account. The expense is taken from the information letter of the involved contractor for transportation. Considering the use of pulpwood as an input raw material for the biomass production, it is also relevant but not demonstrated (in SAR and excel) the accounting of diesel fuel costs for loading / unloading pulpwood by manipulators and transporting it to a chipper. The need / absence of the need to consider the consumption of diesel fuel for the delivery of timber from harvesting plots to the timber warehouse at the production site has not been assessed either – see C-05.

The volume of feedstock fuel is taken from the summary Excel file with all SBP values. It is calculated as the sum of the monthly costs of raw materials for drying (separate lines in the Excel are highlighted).

7.4 Competency of involved personnel

The following key staff members are involved to SBP certification (according to signed SBP Certification Procedure):

- SBP responsible (deputy director for procurement). He is responsible for collection of data from suppliers of wood raw materials; timely training of personnel, compilation of SBR and data collection for calculating greenhouse gases; updating SBP Certification Procedure; consideration of complaints related to SBP certification, storage of documentation related to SBP certification.
- master, pellet production operators (checking the compliance of suppliers of raw materials with the requirements of SBP standards, accounting and control of incoming wood raw materials, collecting data to calculate energy and carbon costs, organization and control of the production process for the production of wood chips, control of production indicators, accounting of finished products).
- accountant (preparation of financial and shipping documentation for pellets with an SBP claim, as well as accounting in corresponding program).

The SBP Certification Procedure provides for annual training as part of the certification requirements. In the course of responsible employees interview:- familiarization of employees with their main responsibilities within the SBP was confirmed – the corresponding training protocol was presented. The interviewed employee responsible for certification of the Verkhovazhsky branch of Holbit LLC (deputy director for procurement) confirmed his responsibilities and knowledge in certification requirements, with the exception of the following:- no clarifications were received regarding the need / absence of the need to indicate the sold certified biomass in the DTS when it is sold to an uncertified buyer;- it has not been confirmed that SDIs should refer to only one reporting period; new SDIs are assigned for each reporting period – see C-02. The rest interviewed employees confirmed their competence in their duties in SBP certification (defined in the approved SBP Certification Procedure Verkhovazhsky branch of Holbit LLC, Version 1-1).

7.5 Stakeholder feedback

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

7.6 Preconditions

Major condition (MC 01) was issued, than closed during the process preparation of audit report. See section 10.

8 Review of Company's Risk Assessments

Not applicable.

9 Review of Company's mitigation measures

Not applicable.

10 Non-conformities and observations

Identify all non-conformities and observations raised/closed during the evaluation (a tabular format below may be used here). Please use as many copies of the table as needed. For each, give details to include at least the following:

- applicable requirement(s)
- grading of the non-conformity (major or minor) or observation with supporting rationale
- timeframe for resolution of the non-conformity
- a statement as to whether the non-conformity is likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks.

NC number 01	NC Grading: Major
Standard & Requirement:	SBP Framework Standard 4: Chain of Custody, V.1.0, March 2015; p. 6.3.1 The legal owner shall implement the requirements of either: PEFC 2002:2013 Section 9: Social, Health and Safety requirements in CoC, Or FSC-STD-40-004 V2-1 EN Section 1.6: Occupational Health and Safety Or the latest versions of these documents.
Description of Non-conformance and Related Evidence:	
The applicant for the certificate demonstrated materials confirming compliance with labor protection and safety requirements within the framework of section 1.4 FSC-STD-40-004 V3-0 RU: evidence of the appointment of responsible persons for labor protection and technical occupational safety (OHAS), availability of OHAS procedures and instructions, regulations on OHAS management system of the Verkhovazhsky branch of Holbit LLC, conducting OHAS trainings (introductory, primary and repeated), as well as training for the head and specialists in labor protection in the amount of 40 hours. Wherein:- fire safety training logs (introductory, primary and repeated) were not demonstrated;- in separate OHAS instructions concerning pellet production (for chippers operator, for pellet production operator, for boiler-house operator), there are no signatures indicating that employees are familiar with their content. During the verification of the results of the COC audits on FSC in terms of OHAS requirements (clause 1.4 of FSC-STD-40-004 v.3-0), it was established:- Exposure of a minor condition on FSC SA2 (2018), closed on D-A,- Exposing a minor condition on FSC SA3 (2019), closed on SA4 (2020). Taking into account repeated non-fulfillment of OHAS requirements revealed in the current SBP audit (regular, systemic non-compliance), the decision was made to qualify it as Major.	
Timeline for Conformance:	Prior to (re)certification
Evidence Provided by Company to close NC:	The responsible specialist conducted trainings on fire safety with the employees, about which the entries were made in the corresponding journals. Employees were familiarized with the instructions on labor protection for the boiler operator, on labor protection for the operator of chippers, on labor protection for the operator for the production of pellets, about which lists of familiarized employees were made with the date of familiarization and personal signature.
Findings for Evaluation of Evidence:	During the preparation of the report, the applicant for the certificate provided evidence of MC elimination identified at the MA:- the Registers of fire safety briefings (includes records of the introductory fire safety briefings) and the Fire safety briefing journal (contains evidence of repeated fire safety trainings) were sent;- OHAS instructions were presented for the boiler operator, for the pellet

	production operator, for the chipper operator. The instructions include lists of the employees familiarized with them (dates, full names and signatures of those familiarized). Taking into account the sufficiency of corrective actions to confirm the elimination of the nonconformity, a decision was made to close the MC-01.
NC Status:	Closed

NC number 02	NC Grading: Minor
Standard & Requirement:	SBP Framework Standard 2: Verification of SBP-compliant Feedstock, V.1.0, March 2015; p. 15.6, 15.7 15.6 The BP shall implement a management review system, which has the authority to make appropriate improvements to the management system. 15.7 Relevant personnel shall be informed promptly of any changes to management systems.
Description of Non-conformance and Related Evidence:	
Approved Procedure for SBP Certification Verkhovazhsky Branch of Holbit LLC Version 1-1 regulates the implementation of certification requirements applicable to the SBP certification scope. The system provides for an annual revision of SBR as well as energy and greenhouse gas data. At the same time, the Procedure does not contain instructions on the management review system, which will provide the authority to take appropriate measures to improve the management system. Section 6 of the Procedure provides for annual training of personnel on SBP requirements. Training Protocols dated 20.04.2020 and 02.11.2020 were demonstrated; according to training protocols all responsible employees were trained in accordance with the necessary standards and internal procedures and instructions of the organization regarding SBP requirements. The interviewed employee responsible for certification of the Verkhovazhsky branch of Holbit LLC (deputy director for procurement) confirmed his responsibilities and knowledge in certification requirements, with the exception of the following:- no clarifications were received regarding the need / absence of the need to indicate the sold certified biomass in the DTS when it is sold to an uncertified buyer;- it has not been confirmed that SDIs should refer to only one reporting period; new SDIs are assigned for each reporting period. The rest interviewed employees confirmed their competence in their duties in SBP certification (defined in the approved SBP Certification Procedure Verkhovazhsky branch of Holbit LLC, Version 1-1). Due to a temporary omission, it was decided to assess the condition as minor.	
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:	Pending
Findings for Evaluation of Evidence:	Pending
NC Status:	Open

NC number 03	NC Grading: Minor
Standard & Requirement:	SBP Framework Standard 5: Collection and Communication of Data, V.1.0, March 2015; p. 5.1 All data submissions must be supported by appropriate evidence.
Description of Non-conformance and Related Evidence:	
The collection of data on energy and greenhouse gases is provided for in section 15 of the approved SBP Certification Procedure Verkhovazhsky Branch of Holbit LLC Version 1-1. According to the evidence	

received, the data are recorded in the form of a summary excel file and summarized in SAR. In the course of a survey of responsible employees and verification of the recorded data, the release of pilot batches of biomass in January 2020 and the full start of pellet production from February 2020 were confirmed. The verification of the SAR data and the summary excel file confirmed the existence of justifications for the values presented in the SAR. At the same time, section 2.1 of SAR indicates 2 categories of incoming raw materials: chips and sawdust. The interviewed director of the Verkhovazhsky branch of Holbit LLC, a woodworker and a repair engineer confirmed the use of pulpwood (accounted for in SBR) for the production of wood chips, which also goes to pellet production. It was clarified that pulpwood was accounted for in the presented volumes in the form of chips, but not identified as a separate line of input material (Table 2.1 SAR). The calculated energy consumption includes the process of crushing pulpwood into chips. No evidence was provided for the inclusion in the accounting data of fuel consumption for unloading pulpwood by manipulators and for transporting pulpwood to a chipper (within the production site). Due to a temporary omission, a decision was made to assess the revealed condition as minor.

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:	Pending
Findings for Evaluation of Evidence:	Pending
NC Status:	Open

NC number 04	NC Grading: Minor
Standard & Requirement:	<p>SBP Instruction Document 5E: Collection and Communication of Energy and Carbon Data, V1.1, November 2019; p. 6.4.1, 6.4.3</p> <p>6.4.1 All feedstock processed by the BP in the Reporting Period for making the biomass product shall be grouped. It should be grouped in a way that makes operational sense to the BP. In the case of multiple transport steps for a Feedstock Group record data by adding one line and merging other columns.</p> <p>6.4.3 For each Feedstock Group the following parameters are recorded:</p> <ol style="list-style-type: none"> a) ID b) Feedstock Type c) Origin d) Physical Description e) Country of harvest (new row for each country) f) Raw mass as received in metric tonnes g) Moisture as received (weighted average, single figure) h) Weighted average distance (km), i) Maximum distance (km) j) Type of vehicle used k) Fuel or driving force used by the vehicle, l) Weighted average truckload, m) Any pre-processing (chipping, drying, none)
Description of Non-conformance and Related Evidence:	
<p>Indication of information on raw materials used for the production of certified biomass in the reporting period is provided in section 2.1 of SAR. The submitted document takes into account 2 groups of inputs of incoming raw materials: chips and sawdust. For each of these groups of raw materials, data are presented in accordance with paragraphs. a-m p. 6.4.3. At the same time, the interviewed director of the Verkho-Vazhsky branch of Holbit LLC, a wood processing foreman and a repair engineer confirmed the use of pulpwood (accounted for in SBR) for the production of chips, which also goes to pellet production. It is clarified that pulpwood is accounted for in the presented volumes in the form of chips, but is not highlighted as a separate</p>	

input line (table 2.1 SAR). It should be noted that most of the parameters in 6.4.3 for pulpwood and chips will be different. Thus, the necessary parameters are not recorded for every group of raw materials. Due to a temporary omission, a decision was made to assess the revealed condition as minor.	
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:	Pending
Findings for Evaluation of Evidence:	Pending
NC Status:	Open

NC number 05	NC Grading: Minor
Standard & Requirement:	SBP Instruction Document 5E: Collection and Communication of Energy and Carbon Data, V1.1, November 2019; p. 6.5.1 The BP shall operate a management system including logbooks or electronic code/card systems to allocate the use of fossil fuel to processing or transport.
Description of Non-conformance and Related Evidence:	
The applicant for the certificate demonstrated the accounting of diesel fuel (DF) consumption in the consolidated excel file:- the fixed consumption of diesel fuel for the operation of loaders is taken into account (big bags are moved to the warehouse), taking into account the time of their operation. The excel file gives a flow rate of 4.5 l/h, according to the link of the organization - 4.6 l/h; for the reporting period, there may be an error of 44 liters;- the average consumption of diesel fuel for the transportation of pellets by trucks to the port is taken into account. The expense is taken from the information letter of the involved contractor for transportation. Taking into account the use of pulpwood as an input raw material for the production of biomass, it is also relevant not demonstrated (in SAR and excel) accounting of diesel fuel costs for loading / unloading pulpwood by manipulators and transporting it to a chipper. The need / absence of the need to take into account the consumption of diesel fuel for the delivery of timber from harvesting sites to the timber warehouse at the production site has not been assessed either. Due to a temporary omission, a decision was made to assess the revealed condition as minor.	
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:	Pending
Findings for Evaluation of Evidence:	Pending
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):	Artem Kornilov
Date of decision:	14/Jan/2021
Other comments:	-