



Preferred by Nature Evaluation of Sawmill 25 JSC (Maimaksa 3 site) Compliance with the SBP Framework: Public Summary Report

First Surveillance Audit

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

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

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1 Overview

CB Name and contact:	NEPCon OÜ, Filosoofi 31, 50108 Tartu, Estonia
Primary contact for SBP:	Ondrej Tarabus ot@preferredbynature.org, +34 605 638 383
Current report completion date:	04/Mar/2021
Report authors:	Nikolai Tochilov
Name of the Company:	Sawmill 25 JSC (Maimaksa 3 site). Legal address: 26 Postysheva str., Arkhangelsk 163025, Russian Federation. Production site address: 25 Rodionova str., Arkhangelsk 163026, Russian Federation
Company contact for SBP:	Viktoria Mitrofanova, deputy production manager. Mob.: +79626636833, email: mitrofanova.viktoriya@sawmill25.ru
Certified Supply Base:	Russia, Arkhangelsk, Vologda, Kirov, Kostroma, Yaroslavl regions and Komi republic.
SBP Certificate Code:	SBP-07-71
Date of certificate issue:	20/Mar/2020
Date of certificate expiry:	19/Mar/2025

This report relates to the First Surveillance Audit

2 Scope of the evaluation and SBP certificate

Scope of certificate includes production of wood pellets at Sawmill 25 Maimaksa 3 production site in Arkhangelsk, Arkhangelsk region, Russia for use in energy production and its transportation by different means of transport to different end points in Europe. 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. 1.3.

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

Maimaksa 3 is one of 3 sites of Sawmill 25 JSC. Sawmill 25 JSC is a primary processor (sawmilling) and a secondary processor (biomass producer) located in the Arkhangelsk region, Russia. The BP holds a valid FSC CoC certificate and uses FSC certified secondary feedstock (sawdust and woodchips) with FSC Mix Credit claim for FSC/SBP certified pellet production. In dryer BP uses bark and residues from sawmilling. All incoming roundwood is covered by the FSC CoC certificate. To produce wood pellets and for heating the BP uses only secondary feedstock, coming from its own primary production (sawmill). For all products, including wood pellets, the FSC credit system is implemented to control FSC claims. Pellets with an FSC Mix Credit claim could be sold as SBP-compliant biomass, with an FSC Controlled Wood claim – as SBP-controlled biomass. The final product may be transported by vessels to different endpoints in Europe, on CIF delivery conditions. Annual production capacity of wood pellets is 90 000 tons.

5.2 Description of Company's Supply Base

JSC Sawmill 25 (Maimaksa 3) is one of the three production sites of JSC Sawmill 25, which is part of one of the largest timber industry holdings in the north-west of Russia – Titan group of companies. JSC Sawmill 25 is one of the five largest processors in the Arkhangelsk region. The main activity of JSC Sawmill 25 (Maimaksa 3) is the production of chamber-dried lumber for export and wood pellets.

JSC Sawmill 25 (Maimaksa 3) is located in the city of Arkhangelsk on the banks of the Severaya Dvina River. In 2014, a wood pellet production plant was commissioned at a site Maimaksa 3.

The territory has a Roundwood storage, a sawmill, woodworking plant and drying chamber, and pellet production.

Round timber is supplied from 1 supplier for sawing and processing. The supplier buys roundwood from about 40 suppliers. Residues from the primary processing of wood - sawdust from sawmill and wood chips shredded into sawdust, that is a residue from milling and chipper-cantering production - are used as feedstock for pellets production. All wood entering the plant is FSC certified or FSC controlled. According to the FSC product group list, pellets are produced with the FSC Mix Credit and FSC Controlled Wood claims, which correspond to SBP-compliant biomass and SBP-controlled biomass. Feedstock for pellets production (sawdust) is classified as SBP-compliant secondary feedstock and SBP-controlled secondary feedstock.

JSC Sawmill 25 has a common supply base for all three production sites and has identified the following regions of wood supply during the reporting period and for the coming year as a supply base: Arkhangelsk Region, Vologda Region, Kirov Region, Kostroma Region, Yaroslavl Region, Komi Republic.

Officially, the forest territory of the Russian Federation (forest fund) accounts for 81 071 million m³ of the global standing stock of roughly 557 billion m³, that is, about 15%. The forest fund of Russia is 1 146,1 million ha.

In accordance with the legislation of the Russian Federation, all lands of the forest fund are in state ownership. Legal entities receive forest plots for use for a period of 10 to 49 years on loan (with the possibility of their

prolongation). Long-term rental relations are the dominant legal form for obtaining the right to harvest timber on stem. The signing of lease agreements for forest plots or purchase and sale agreements for forest stands is carried out at auctions for the sale of the right to conclude such agreements. Leased lands must pass a state cadastral registration.

The Forest Code of the Russian Federation obliges each tenant to develop a forest development plan for 10 years (based on taxation and forest regulation), implement measures for the conservation, protection and regeneration of forests. Once a yearly quarter, concession holders are required to submit a report on harvested areas and volumes, and on the implementation of planned forest management measures.

Besides, an obligatory digital data processing system, the 'Uniform State Automated Information System' (EGAIS) was launched January 1, 2015. Every legal entity trading roundwood (and several timber related products) has to register its trade flows in this system. The imported data become publicly available online. The system is a useful tool in fighting illegal wood.

What has not changed is that forest use in Russia is characterized by a negative ratio of forest income and costs of forest management for the owner of the forests, the government. The government budget spent on forest management is around 170% the income the government obtains from the exploitation of forests (IOP Conference Series, 2019).

Within the Supply Base, forest management practices are based on the achievement of renewable sustainable forest management in accordance with the requirements of forest legislation and the principles of forest certification. The rotation period is 100-120 years (for conifers). Only clear cuts are used as a method of wood harvesting at the maturity stage with subsequent reforestation. Sanitary felling is also possible. The maximum cutting area in boreal forests is limited to 50 ha and in temperate zone – to 20 ha. Reforestation can be done with planting seedlings (at 13% of the territory) or the promotion of natural regeneration (at 87% of the territory). Ensuring high-quality reproduction of forest resources and protective afforestation is a prerequisite for the use of forests. To do this, a Forest Development Project is being developed, the measures in which are aimed at improving the forestry characteristics of the forest area, and the implementation of continuous and sustainable forest management.

The supply base regions are located within the taiga forest and central belt of Russia.

Region	Nature zone according to Russian classification	Nature zone according to western classification	Area of forest fund, mln. ha
Arkhangelsk Region	Northern taiga, middle taiga	Boreal forest	29,2
Komi republic	Northern Taiga, middle taiga	Boreal forest	36,3
Vologda Region	Middle taiga, southern taiga	Boreal forest	11,5
Kirov Region	Middle taiga, southern taiga	Boreal forest	7,0
	Mixed forests	Temperate forest	1,1
Kostroma Region	Southern taiga	Boreal forest	4,6
Yaroslavl region	Southern taiga	Boreal forest	1,0

	Mixed forests	Temperate forest	0,8
Total			91,5

Northern and middle taiga form a wide boreal strip in the European part of Russia and Siberia. The main forest species of boreal (taiga) forests are two groups of species: dark coniferous and light coniferous.

In European Russia, dark coniferous forests are represented by Norway spruce (*Picea abies*). There could be met Siberian fir (*Abies sibirica*), less often Siberian pine cedar (*Pinus sibirica*).

Light coniferous forests are predominantly represented by pine forests from *Pinus sylvestris* and less commonly by larch forests from *Larix sibirica*. Light coniferous forests, as a rule, are formed after fires in the place of dark coniferous.

In the middle taiga, mixed forests of dark coniferous, light coniferous, and small-leaved trees in different combinations are often formed. After felling (and sometimes after fires), birch forests and aspen forests are formed in the boreal zone (the latter are more often in the middle taiga).

Norway spruce (*Picea abies*) and Scots pine (*Pinus sylvestris*) prevail as coniferous species in the southern taiga. In the southern taiga there is an admixture of hardwood in the second layer.

The Federal Service for Supervision of Natural Resources of Russia (Rosprirodnadzor) approved the list of animal and plant species that fall under the Convention on International Trade in Endangered Species of wild fauna and flora (CITES). The CITES list became effective from June 12, 2013. In Russia there are four CITES listed timber species: *Taxus cuspidata*, *Fraxinus mandshurica*, *Pinus koraiensis*, and *Quercus mongolica*. These tree species, however, are only found in the Asian part of Russia (not in the Supply Base of JSC Sawmill 25).

Next to the CITES protected flora and fauna there are national red lists with protected animals and plants. Some of these species are present in the Supply Base. Considering the red-listed tree species, one can find in the Supply Base for example Karelian birch (*Betula pendula* var. *carelica*), European white elm (*Ulmus laevis*), Wych elm (*Ulmus glabra*), Russian larch (*Larix archangelica*); Russian willow (*Salix rossica*); Swamp willow (*S. myrtillioides*); downy willow (*S. lapponum*); almond willow (*S. triandra*); and the shrub Dwarf bog birch (*Betula humilis*).

JSC Sawmill 25 processes only Norway spruce (*Picea abies*) and Scots pine (*Pinus sylvestris*).

Within the regions of the supply base, deep wood processing prevails over the export of round timber. The leading areas of processing are the production of lumber, plywood, fiberboard, chipboard, pulp, paper and cardboard production, wooden housing construction. Pellet production accounts for less than 1% of the total wood harvesting within the supply base.

By the scale of wood processing, JSC Sawmill 25 is the leading enterprise in the Arkhangelsk region. However, not all waste is used for the production of pellets. Some of them are sold or burned in their own CHP.

JSC Sawmill 25 plays a large socio-economic role in the city and the region. The company provides many jobs to the local population. In its activities and determining development priorities, the enterprise complies with all ecological and environmental requirements of Russian legislation, builds partnerships with non-governmental environmental organizations such as Greenpeace and WWF. JSC Sawmill 25 is a member of the Association of Environmentally Responsible Forest Users of Russia.

5.3 Detailed description of Supply Base

Total Supply Base area (ha):	91,5 mln. ha
Tenure by type (ha):	public 91,5 mln. ha
Forest by type (ha):	boreal 89,6 mln. ha; temperate 1,9 mln. ha
Forest by management type (ha):	managed natural 91,5 mln. ha
Certified forest by scheme (ha):	18 095 899,20 ha FSC-certified forest

A detailed information about the BP's supply base may be found in their Supply Base Report available on the Internet <http://www.sawmill25.ru/en/продукция/политика-в-области-устойчивого-лесоп/>.

5.4 Chain of Custody system

The BP holds valid FSC CoC certificate

<https://info.fsc.org/details.php?id=a0240000005sTvEAAU&type=certificate> covering the primary (sawmilling) and secondary (wood working, pellet production) wood processing. Only secondary feedstock (sawdust, wood chips, bark and sawmilling residues) with FSC Mix Credit and FSC Controlled Wood claims are used for pellet production and FSC credit system of claims is implemented (all pellets have FSC Mix Credit or FSC Controlled Wood claims respectively). The BP calculates a conversion factor based on actual information on input and output volumes (measurement of the number of front loader buckets and weighing of pellets).

There is no invoicing inside the organisation. Instead, the economic and planning department prepares on a monthly basis an internal report on the secondary feedstock inputs to pellet production. It includes a description of the feedstock (sawdust, wood chips, bark, and dust) and the volume of physical input (based on actual volume of feedstock used) and the certified status of the material.

The only supplier of roundwood is ICE Titan LLC

<https://info.fsc.org/details.php?id=a0240000005sUgQAAU&type=certificate>).

6 Evaluation process

6.1 Timing of evaluation activities

Onsite audit was conducted on December 2-4, 2020 (app. 10 working hours). Assessment activities included documents review at office, inspection of production facilities and staff interviews.

Activity	Location	Date/time
Opening meeting	Office	02/12/2020 09.00-09.30
Documents and procedures review (feedstock inputs, SBR, CoC control system and critical points, compliance with legal requirements, H&S), staff interview.	Office	02/12/2020 11.00-13.00, 14.00-16.00
Chain of custody review (site tour); staff interview	Production facilities	03/12/2020 15.00-16.00
Documents and procedures review (SAR and energy use primary data, DTS); staff interview	Office	03/12/2020 16.00-17.00
Documents and procedures review (SAR and energy use primary data, DTS); staff interview	Office	04/12/2020 12.30 – 16.00
Closing meeting	Office	04/12/2020 16.00-16.30

6.2 Description of evaluation activities

Composition of audit team:

Auditor(s), roles	Qualifications
Nikolai Tochilov, audit team leader	Preferred by Nature SBP lead auditor. He has successfully passed SBP auditor training in Tallinn in January 2015; previous experience with more than 50 SBP assessments and annual audits in Russia, Portugal, Germany, Netherlands, Belgium, Latvia, Belarus and Vietnam.
Mikhail Rai, audit team leader	Preferred by Nature SBP lead auditor.

	He has successfully passed SBP auditor training in Berlin in September 2019; previous experience with several SBP assessments and annual audits in Russia and Belarus.
Anna Repina, auditor in training	Anna has passed SBP lead auditor online training in August 2020. No previous experience in SBP audits.

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 audit, which started with an opening meeting attended by the representatives from Organisation's management and staff.

Audit team leader introduced the audit team, provided information about audit plan, methodology, auditor qualification, confidentiality issues, and assessment methodology and clarified certification scope. During the opening meeting the audit team leader explained CB's accreditation related issues.

After that auditors 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, emission and energy data and categorisation of input and verification of SBP-compliant biomass. Chain of Custody implementation was reviewed focusing in the Critical Control Points, in particular it was verified reception of the material and it's classification, identification of feedstock origin, production process with the conversion factors associated, mass balance, final product storage and sales. During the process, overall responsible person for SBP system and other staff were interviewed.

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

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.

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6.3 Process for consultation with stakeholders

Not applicable for the audit.

7 Results

7.1 Main strengths and weaknesses

Strengths: use of the FSC credit system; only FSC Mix Credit and FSC Controlled Wood secondary feedstock is sourced; non-certified feedstock is not accepted. Small number of the management staff and clearly designated responsibilities within the staff members.

Weaknesses: please see section 10 below in this report.

7.2 Rigour of Supply Base Evaluation

Not applicable.

7.3 Collection and Communication of Data

The following energy sources are used by the BP: electricity for pellet production; diesel for feedstock delivery and handling; diesel for biomass transportation to customer. Diesel consumption value by loaders is based on actual refuelling data obtained in accountancy and engineering calculations; electricity consumption by pellet plant (including office facilities and staffrooms) is based on readings obtained from installed electric meter.

7.4 Competency of involved personnel

Overall, the BP's staff showed good understanding of knowledge of all applicable SBP requirements. Generally, very few staff members are involved into SBP certification:

- BP's management (appointment of SBP responsible, anti-bribery policy and code of conduct, trade and tax legislation, EUTR requirements and DDS implementation);
- SBP responsible person/deputy production manager (SBP procedures and systems updates, SAR, SBR, SREG (if applicable), SDIs, complaints);
- Head of export department (credit account, distances, SREG (if applicable), DTS, sales);
- Head of pellet mill (moisture measurements);
- Boiler room manager (biofuel moisture measurements);
- Deputy chief engineer (registration of electricity and biofuel consumption, CHP data collection);
- Head of economic and planning department (registration of inputs and outputs, conversion factor updates, registration of diesel consumption);
- Head of forest products supply department (Chain of custody, SBR);
- Separate H&S responsible (H&S implementation).

Prior to and during SBP audit, BP was supported by external consultant, who also has provided relevant training to BP staff

7.5 Stakeholder feedback

Not applicable for the audit.

7.6 Preconditions

None.

8 Review of Company's Risk Assessments

Not applicable.

9 Review of Company's mitigation measures

Not applicable.

10 Non-conformities and observations

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 01/21	NC Grading: Observation
Standard & Requirement:	SBP Standard 2: Verification of SBP-compliant Feedstock V1-0, 6.3 The BP shall ensure that the place of harvesting is within the defined SB.
Description of Non-conformance and Related Evidence:	
<p>The BP implements the following procedure to verify the place of harvesting. The SBP responsible requests the information from the forestry department and then the forestry department requests the information from the supplier – ICE Titan LLC. ICE Titan provides information as a list of suppliers, consignors, and FMEs and the BP uses the list as a justification of the place of harvesting. Verification of the list and transport documents showed that one of the forest managers was not included in the list. After the gap was revealed the BP’s representative has requested relevant information as prescribed in the Procedure. All necessary data has been provided by the supplier.</p> <p>Due to the single case and the fact that the gap was only related to the list (the supplier collects all the required information), an observation has been made.</p> <p>The BP should follow the developed procedure to keep the most recent information regarding the place of harvesting.</p>	
Timeline for Conformance:	-
Evidence Provided by Company to close NC:	-
Findings for Evaluation of Evidence:	-
NC Status:	-

NC number 01/21	NC Grading: Major
Standard & Requirement:	SBP Standard 4: Chain of Custody V1-0, 5.3.1 All requirements of the relevant chain of custody control system specified in the SBP-approved CoC system shall be implemented to calculate outputs.

Description of Non-conformance and Related Evidence:	
<p>Engineering calculations have been done by audit team to verify the mass balance between input and output for pellet production: $(100 - 51,8) / (100 - 6,9) = 0,517$, Where 51,8 is the average feedstock moisture,%, and 6,9 is the average biomass moisture, %. 132454,3 (tons of feedstock submitted to the pellet plant in the reporting period) x 0,517 = 68479 tones (of biomass could be produced) Actual production was 78 662,042 tones. The discrepancy between engineering calculation and actual production is -14,8%. While audit team acknowledges that the discrepancy between engineering calculation and the actual biomass production may exist, Organisation was not able to justify the reasons for that.</p> <p>Команда аудиторов произвела теоретический расчет для проверки массового баланса входа и выхода при производстве пеллет: $(100 - 51,8) / (100 - 6,9) = 0,517$, где 51,8 – средняя влажность сырья, %, и 6,9 – средняя влажность пеллет, %. 132454,3 (тонн сырья, поданного на пеллетное производство в отчетном периоде) x 0,517 = 68479 тонн (пеллет могло быть произведено). Фактический объем производства составил 78662,042 тонн. Разница между теоретическим расчетом и фактическим результатом производства составила -14,8%.</p> <p>Команда аудиторов признает, что может разница между теоретическим расчетом и фактическим результатом производства может существовать, однако Организация не смогла объяснить причины этого.</p>	
Timeline for Conformance:	3 months from the report finalization / 3 месяца с даты утверждения отчета
Evidence Provided by Company to close NC:	Pending / На рассмотрении
Findings for Evaluation of Evidence:	Pending / На рассмотрении
NC Status:	Open / Открыто

NC number 02/21	NC Grading: Major
Standard & Requirement:	SBP Standard 4: Chain of Custody V1-0, 5.1.2 The legal owner shall implement all aspects of the SBP approved CoC system requirements for the SBP feedstock or biomass. Where there is a conflict between the requirements in the SBP-approved CoC system requirements and those specified in the SBP standards, the SBP standards shall have precedence.
Description of Non-conformance and Related Evidence:	

Organisation on a yearly basis calculates the conversion factor for pellet production, comparing the amount of sawlogs input to the sawmilling production with the amount of biomass output at pellet production. For example, based on actual production results during 2019, for the year 2020 the conversion factor was determined as 10 solid m3 sawlogs / 1 metric tons biomass. This conversion factor was used in 2020 to maintain and update the FSC credit account, for calculation of the credits available for pellet production with FSC Mix Credit and FSC Controlled Wood claims.

At the same time, Organisation constantly monitors and registers the actual amount of the feedstock (sawdust and wood chips) submitted to the pellet production. This monitoring is based on registration of amount of the bucket deliveries by the front-end loader. Obtained data on feedstock amount is used in SAR document (table 2.1), as well as entered to a separate SBP credit account; however this data is not used in FSC credit account to adjust the conversion factor value there.

Available amounts of credit for pellets entered to the FSC credit account (for example, with FSC Mix Credit claim) do not correspond available amounts of credit for pellets entered to the SBP credit account (correspondingly, for SBP-compliant biomass claim).

Организация ежегодно рассчитывает коэффициент выхода для пеллетного производства, сравнивая общий объем пиловочника на входе в лесопильное производство с общим объемом производства пеллет. Например, по результатам работы в 2019 году, на 2020 год коэффициент выхода был установлен как 10 плотных м3 пиловочника / 1 тонна пеллет. Указанный коэффициент применялся в течение 2020 года в FSC кредитном счете для расчета количества пеллет, доступных для продажи (с заявлением FSC Mix Credit или FSC Controlled Wood).

Параллельно Организация ведет постоянный учет количества сырья (опилки и щепы), фактически поданного в пеллетное производство. Учет осуществляется по количеству поданных ковшей фронтального погрузчика. Полученные данные по количеству сырья используются для заполнения документа SAR (таблица 2.1) и для ведения отдельного кредитного счета SBP, но при этом никак не учитываются при ведении кредитного счета FSC в части корректировки коэффициента выхода.

Объемы доступного кредита для пеллет, зачисляемые на кредитный счет FSC (например, FSC Mix Credit), не соответствуют объемам доступного кредита для пеллет, зачисляемым на кредитный счет SBP (соответственно, SBP-compliant biomass).

Timeline for Conformance:	3 months from the report finalization / 3 месяца с даты утверждения отчета
Evidence Provided by Company to close NC:	Pending / На рассмотрении
Findings for Evaluation of Evidence:	Pending / На рассмотрении
NC Status:	Open / Открыто

11 Certification decision

Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:

Certification decision:	Certification approved
Certification decision by (name of the person):	Pilar Gorría Serrano
Date of decision:	04/Mar/2021
Other comments:	<i>Click or tap here to enter text.</i>