



NEPCon OÜ Evaluation of CellMark SA Compliance with the SBP Framework: Public Summary Report

Main (Initial) Audit

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Table of Contents

- 1 Overview**
- 2 Scope of the evaluation and SBP certificate**
 - 2.1 Description of the company
 - 2.2 Detailed description of the Chain of Custody system
- 3 Specific objective**
- 4 Evaluation process**
 - 4.1 Timing of evaluation activities
 - 4.2 Description of evaluation activities
 - 4.3 Sampling methodology
 - 4.4 CB stakeholder engagement
 - 4.5 Stakeholder feedback
- 5 Results**
 - 5.1 Main strengths and weaknesses
 - 5.2 Rigour of Supply Base Evaluation
 - 5.3 Collection and communication of data
 - 5.4 Competency of involved personnel
- 6 Review of company's risk assessments**
 - 6.1 Overview of company's risk assessments and mitigation measures
 - 6.2 Specified risk indicators and mitigation measures
- 7 Non-conformities and observations**
- 8 Certification decision**

1 Overview

Certification Body (CB) Name:	NEPCon OÜ
Primary CB contact for SBP:	Ondrej Tarabus
Primary CB contact email:	otarabus@preferredbynature.org
Audit team leader:	Pilar Gorria Serrano
Audit team members:	Pilar Gorría
Name of the Company:	CellMark SA
Company legal address:	Rue Pedro-meylan 1, 1208 Geneve, Switzerland
Company contact for SBP:	Malin Borjesson
Company contact email:	malin.borjesson@cellmark.com
Company website:	N/A
SBP Certificate Code:	SBP-08-36
Date of certificate issue:	26 Mar 2021
Date of certificate expiry:	25 Mar 2026
Audit closing meeting date:	24 Feb 2021
Audit cycle:	Main (Initial) Audit

2 Scope of the evaluation and SBP certificate

Scope Item	Check all that apply to the Certificate Scope	Change in scope (N/A for Assessments)
Primary Activity:	Trader	<input type="checkbox"/>
Approved Standards:	SBP Standard 4: Chain of Custody; SBP Standard 5: Collection and Communication of Data Instruction; Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.3	<input type="checkbox"/>
Includes Supply Base Evaluation (SBE):	No	<input type="checkbox"/>
Includes communication of Dynamic Batch Sustainability Data (DBSD)	Yes	<input type="checkbox"/>
Includes Group Scheme	No	<input type="checkbox"/>
Products	Pellets, Chips	<input type="checkbox"/>

Feedstock types:	Primary	<input type="checkbox"/>
Feedstock origin (countries):	N/A	<input type="checkbox"/>
SBP-endorsed Regional Risk Assessments used:	Not applicable	<input type="checkbox"/>
Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/		<input type="checkbox"/>
Chain of custody system implemented:	PEFC, FSC: N/A	<input type="checkbox"/>
	Transfer	<input type="checkbox"/>

2.1 Description of the company

CellMark is a privately owned, independent marketing and supply chain service company providing products, services and solutions to customers and suppliers all over the world. We facilitate trade and business development across multiple industries using our many local offices and professional expertise. Through a network of 70-plus offices in 30-plus countries, CellMark provide a full suite of services: sourcing, sales and marketing, exclusive representation, finance, logistics, regulatory compliance, business development and custom chemicals manufacturing. CellMark also partner with clients to identify new business opportunities that add value to their processes and products or serve purely as an external sales or sourcing division. CellMark SA purchases and sells wood pellets and wood chips with the SBP-compliant biomass, or SBP-controlled biomass claims. CellMark is an FSC and PEFC certified trader. CellMark does not have any storage places in scope yet. Possible incoterms conditions for trade are FCA, DAP, DDP, DPU, CIP, EXW, FOB, CIF, CPT, or CFR.

2.2 Detailed description of the Chain of Custody system

The Organization is a trader without physical possession. The purchase documents are received and saved under the IT system. Responsible person shown good performance evaluating suppliers invoices. All material is received with FSC or PEFC Claim. Claims used are: FSC Controlled Wood, FSC Mix and FSC 100%. As well as PEFC x% Certified. Transfer system is implemented. All SBP transactions are of shiploads without physical possession, no storage is used by the organization.

3 Specific objective

The specific objective of this evaluation was to confirm that the Biomass Trader'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 Biomass Trader's management procedures;
- Review of control points in the FSC CoC system that affects the SBP certificate;
- Interviews with responsible staff; and
- Review of the records

4 Evaluation process

4.1 Timing of evaluation activities

<i>Audit Level of Effort (LoE)</i>		
Activity	Auditors	Auditor hours
1. Preparation	Pilar Gorriá	2,0
2. On-site (excl. travel time)	Pilar Gorriá	4,0
3. Report writing	Pilar Gorriá	4,0
4. Other	N/A	N/A

Audit Schedule			
Activity	Location	Auditor name	Date/time
<i>Opening meeting</i>	PbN Office. Desk	PGS	24 Feb 2021/10:00
<i>Interview with the SBP responsible person; review of procedures.</i>	PbN Office. Desk	PGS	24 Feb 2021/10:15
<i>Interview responsible people for purchasing, logistics, storage, sales</i>	PbN Office. Desk	PGS	24 Feb 2021/11:00

<i>Energy data collection. STD 5</i>	PbN Office. Desk	PGS	24 Feb 2021/12:45
<i>Closing meeting</i>	PbN Office. Desk	PGS	24 Feb 2021/13:45

Auditor qualification		
Auditor name	Role	Qualification
Pilar Gorriá	Lead auditor	Forest engineer (Pplitecnic Univ. Of Madrid). Has successfully completed SBP training course and the NEPCon Lead auditor training for FSC/PEFC CoC and FM certification. Has experience from forest certification (FSC / PEFC FM), traceability (FSC / PEFC CoC) and biomass certification (SBP - Sustainable Biomass Program) for more than 10 years.

4.2 Description of evaluation activities

The audit started with an opening meeting attended by overall quality manager and operations manager.

Auditor introduced herself, provided information about audit plan, methodology and aim of the audit. CB's approval related issues and confidentiality issues were covered as well.

After, the auditor went through all applicable requirements of the applicable SBP requirements covering management system, recordkeeping requirements 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, mass balance, final product storage and sales. Furthermore, the purchasing and logistics functions were audited. During the process overall responsible person for the SBP system and staff having key responsibilities within the system was interviewed.

During the closing meeting auditor explained the results of the audit to director and logistic manager further actions were discussed.

4.3 Sampling methodology

For the main assessment no activity sampling was applicable. Training records were reviewed for the period prior the assessment and a sample of purchase/sales were reviewed to verify their IT system and procedures.

4.4 CB stakeholder engagement

Not applicable for trader

4.5 Stakeholder feedback

Not applicable for trader

5 Results

5.1 Main strengths and weaknesses

Strengths: Cellmark is involved in trading activities on time ago and materialize this long lasting experience. It is only a small group of people that will work with SBP related activities and the responsible staff showed good knowledge about the SBP system and how it will be implemented in the organization.

Weaknesses: See minor NCR issued

5.2 Rigour of Supply Base Evaluation

Not applicable

5.3 Collection and communication of data

The organization is collecting and communicating GHG and energy data when they are involved in transport. The organization has competence for this and will communicate the results via SREG to the customer. During this reporting period no SREG has been applicable.

5.4 Competency of involved personnel

The involved personnel were found competent in implementing the SBP CoC system, making correct claims, managing DTS system and forwarding GHG/Transport data in SREG documents when required.

6 Review of company's risk assessments

6.1 Overview of company's risk assessments and mitigation measures

Not applicable

6.2 Specified risk indicators and mitigation measures

Country/Area	Indicator	Specified risk description	Mitigation measure
N/A	N/A	N/A	N/A

7 Non-conformities and observations

NC number NC-000094	NC Grading: Minor
Standard:	SBP Standard 4: Chain of Custody
Requirement:	6.1.4 SBP certificate holders shall comply with all trade and customs requirements including payment of any fees and duties.
Description of Non-conformance and Related Evidence:	
<p>The company representatives are well aware about the applicable laws and regulations in countries where it conducts business. The interview has revealed that there is good knowledge about the legislation applicable for Cellmark and the organization has a procedure for compliance with trade and customs law. During the audit, justification about compliance with payment of any fees and duties was requested, the organization request documentation from the tax agency but at the time of the closing meeting the documentation has not been provided.</p>	
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:	Record from the Tax Office and interview with the financial department in the organization
Findings for Evaluation of Evidence:	Responsible staff has demonstrated to have good understanding on the requirements and obligations regarding trade and customs. Prior to close this report has provided the official communication from the tax office where it is stated that the organization has no pending payments of any duties and fees.
NC Status:	Closed

8 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):	Olesja Puiso
Date of decision:	26 Mar 2021
Other comments:	N/A