



NEPCon OÜ Evaluation of Kopyl State Forest Experiential Enterprise Compliance with the SBP Framework: Public Summary Report

First Surveillance Audit

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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:	Aliaksandr Zubkevich
Audit team members:	Aliaksandr Zubkevich
Name of the Company:	Kopyl State Forest Experiential Enterprise
Company legal address:	Ulitsa Zaozernaya 2, d.35., Minsk region, 223927 Kopyl, Belarus
Company contact for SBP:	Sergey Uldinovich
Company contact email:	leskhokopyl@yandex.ru
Company website:	N/A
SBP Certificate Code:	SBP-07-55
Date of certificate issue:	13 Feb 2020
Date of certificate expiry:	12 Feb 2025
Audit closing meeting date:	28 Jan 2021
Audit cycle:	First Surveillance 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:	Biomass Producer	<input type="checkbox"/>
Approved Standards:	SBP Standard 2: Verification of SBP-compliant Feedstock; SBP Standard 4: Chain of Custody; SBP Standard 5: Collection and Communication of Data Instruction	<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	<input type="checkbox"/>

Feedstock types:	Primary, Secondary	<input type="checkbox"/>
Feedstock origin (countries):	Belarus	<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:	FSC: SGS-FM/COC-011036	<input type="checkbox"/>
	Transfer	<input type="checkbox"/>

2.1 Description of the company

Kopyl State Forest Experiential Enterprise is situated in the south-western part of Minsk region on the territory of 4 administrative districts: Kopyl, Stolbtsy, Nesvizh, Slutsk. The enterprise comprises five forest districts, production and logging facilities and a base nursery. The company is involved in forestry, wood harvesting, wood processing and trade both within the country and abroad. It is responsible for 35.5 thousand ha of forest territory. The Organisation holds valid FSC FM/Chain of Custody certificate with FSC transfer system in the scope. Kopyl State Forest Experiential Enterprise” for the production of pellets uses only the FSC 100% certified wood which grows in the territory of forest fund of the entity. The following categories of raw materials are used for production of pellets: wood chips (chipped slab wood and offcuts as a part of sawmill production), roundwood (dead wood, low quality stem), sawdust. The following categories of raw materials are used for drier: Wood chips (made from roundwood (fuel wood, low quality stem). The BP implements FSC transfer system and produced biomass is sold with FSC 100% claim. Pellet plant was commissioned in November 2019.

2.2 Detailed description of the Chain of Custody system

The Organisation has implemented FSC transfer system. The input material used by the Organisation for biomass production as well as for drier contains secondary feedstock – sawdust and wood industry residues for pellet production and primary feedstock (law grade stem wood, fuel wood). All feedstock is FSC certified and originates only from forest area of the BP, which FSC certified.

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

4 Evaluation process

4.1 Timing of evaluation activities

<i>Audit Level of Effort (LoE)</i>		
Activity	Auditors	Auditor hours
1. Preparation	Aliaksandr Zubkevich	2,0
2. On-site (excl. travel time)	Aliaksandr Zubkevich	8,0
3. Report writing	Aliaksandr Zubkevich	8,0
4. Other	N/A	N/A

Audit Schedule			
Activity	Location	Auditor name	Date/time
<i>Opening meeting</i>	office in Kopyl	Aliaksandr Zubkevich	28 Jan 2021/9:00
<i>Documents and procedures review</i>	office in Kopyl	Aliaksandr Zubkevich	28 Jan 2021/9:30
<i>Chain of custody review</i>	pellet mill	Aliaksandr Zubkevich	28 Jan 2021/13:00
<i>Documents and procedures review</i>	pellet mill	Aliaksandr Zubkevich	28 Jan 2021/14:00

<i>Closing meeting</i>	office in Kopyl	Aliaksandr Zubkevich	28 Jan 2021/16:30
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Auditor qualification		
Auditor name	Role	Qualification
Aliaksandr Zubkevich	Audit team leader	Mr Aliaksandr Zubkevich has education of engineer-economist in timber industry. He had postgraduate study at the Belarusian State Technological University. A. Zubkevich has passed FSC CoC/ FM lead auditor training course, Legal Source, ISO 14001 and SBP training coursed. Previous experience in woodworking industry and SBP pre-assessment and assessments in Belarus.

4.2 Description of evaluation activities

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:

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

Audit team leader 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, management system, CoC, recordkeeping, 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.

Chain of Custody implementation was reviewed focusing in the Critical Control Points (see more information in standard 4 CCP section), in particular it was verified reception of the material and it's

classification, identification of feedstock origin, production process with the conversion factors associated, final product storage and sales. 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, emission and energy data and categorisation of input and verification of SBP-compliant biomass. The data in DTS was reviewed. 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 assessment conclusions based on use of 3 angle evaluation method were provided to the management and SBP responsible person.

4.3 Sampling methodology

During audit were visited office and pellet plant. The data in DTS was reviewed. The next responsible person were interviewed: certification and standardization engineer, chief pellet plant master, chief engineer, bookkeeper.

4.4 CB stakeholder engagement

The stakeholder consultation was not carried out for this audit.

4.5 Stakeholder feedback

No feedback from stakeholders have been received prior, during and after this audit.

5 Results

5.1 Main strengths and weaknesses

Strengths: Use of the FSC transfer system. Effective recordkeeping system. Small number of the management staff and clearly designated responsibilities within the staff members.

Weaknesses: See NCRs below.

5.2 Rigour of Supply Base Evaluation

Not applicable.

5.3 Collection and communication of data

The following energy sources are used by BP: electricity for pellet production; diesel for feedstock handling, shipping and for biomass transportation to customer. Electricity consumption value is based invoicing from supplier; diesel consumption value is based on diesel consumption monitoring.

5.4 Competency of involved personnel

Overall, BP staff understand applicable SBP requirements. Interviewed staff was familiar with their responsibilities. Generally, very few staff members are involved into SBP certification: SBP responsible/quality engineer (maintaining of the management system, staff training, trademark use), master of pellet plant (moisture measurements, volumes of biomass registering), bookkeeper (fuel consumption recording) deputy chief accountant (registering of outgoing invoices and transport documents), foreign economic engineer – DTS system.

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-000207	NC Grading: Major
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.3
Requirement:	3.3.3 Feedstock shall retain its original characteristics as processed and characteristics shall not be transferred between transaction batches.
Description of Non-conformance and Related Evidence:	
During assessment the BP planned to use only secondary feedstock for biomass production and was described in a SAR. The BP has started to use primary feedstock with FSC 100% claim for biomass production from March 2020. And all produced from primary feedstock biomass was sold with an SDE+ Compliant Category 5 FSC 100% claim. It total from 11528,57 sold biomass 4280,75 t was produced from primary feedstock and shall be sold as category 1	
Timeline for Conformance:	3 months from the report finalisation
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number NC-000208	NC Grading: Major
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.3
Requirement:	5.2.2 For all DBSD reported in the DTS, the organisation shall set up and maintain a Mass Balance account according to which additions and deductions of credits shall be recorded.
Description of Non-conformance and Related Evidence:	
During assessment the BP planned to use only secondary feedstock for biomass production. The mass balance due to only one category was planned to use was not created. The BP has started to use primary	

feedstock with FSC 100% claim for biomass production from March 2020. The BP has not set up a Mass balance account. And all produced from primary feedstock biomass was sold with an SDE+ Compliant Category 5 FSC 100% claim. It total from 11528,57 sold biomass 4280,75 t was produced from primary feedstock and shall be sold as category 1.	
Timeline for Conformance:	3 months from the report finalisation
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number NC-000081	NC Grading: Major
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.3
Requirement:	6.2.2 The BP must inform its CB when a significant change in the operations occurs, resulting in a variation of electricity use or fossil fuel use greater than 25%. Examples may result from a change of production process, a plant refurbishment after an incident, a major change in feedstock used (e.g. use of logs instead of saw mill residues), change of fuel for drying (e.g. fossil fuel instead of biomass) etc. In that case, a new audit shall be required as soon as stable operations have been reached during three (3) consecutive months after the change has occurred.
Description of Non-conformance and Related Evidence:	
It was found out that in reporting period significant changes took a placed, but the BP has not informed its CB about such a changes. The changes are: 1) a major change in feedstock used (more then 25% of feedstock was primary instead of secondary) 2) changed in diesel consumprion greater than 25%.	
Timeline for Conformance:	3 months from the report finalisation
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number NC-000082	NC Grading: Minor
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.3
Requirement:	6.5.3 The BP shall justify the data and methodology used for reporting energy and carbon data and this shall be recorded in the SAR and verified by the CB.
Description of Non-conformance and Related Evidence:	
The BP has justified data and methodology like diesel consumption calculation, electricity consumption calculation, but justification was not recorded in the SAR	
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:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number NC-000083	NC Grading: Minor
Standard:	SBP Standard 2: Verification of SBP-compliant Feedstock
Requirement:	7.3 The SBR shall be completed using the latest version of the SBR template, which is available from the SBP website.
Description of Non-conformance and Related Evidence:	
Not the latest template of Supply Base Report has been used by BP. The name Sustainable Biomass Partnership is used instead of Sustainable Biomass Program in few cases. Название Sustainable Biomass Partnership было использовано в некоторых случаях вместо Sustainable Biomass Program.	
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:	Supply base reports on internet site of the BP https://kopyllh.by/sertifikacziya/sertifikacziya-sbp/ Supply base report in Audit portal
Findings for Evaluation of Evidence:	The BP has corrected SBR for 2020 year on own internet site. In 2021 report was prepared in SBP audit portal using the latest version of SBR template..

NC Status:	Closed
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NC number NC-000084	NC Grading: Minor
Standard:	SBP Standard 2: Verification of SBP-compliant Feedstock
Requirement:	IN2C; 4.1 The report shall be concise, covering the most important features, and shall be completed using the latest version of the SBR template for Biomass Producers downloaded from the SBP website.
Description of Non-conformance and Related Evidence:	
The Supply Base Report do not cover all information required by SBP, for example, information about the presence of any CITES or IUCN species.is not included in the report. Отчет о ресурсной базе не включает всю требуемую SBP информацию, например, о наличии видов, включенных в списки CITES или IUCN	
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:	Supply base reports on internet site of the BP https://kopyllh.by/sertifikacziya/sertifikacziya-sbp/Supply base report in Aud it portal
Findings for Evaluation of Evidence:	The BP has corrected SBR for 2020 year on own internet site. In 2021 report was prepared in SBP audit portal using the latest version of SBR template. Review of SBR showed that there are many mistakes in the report: 1) in section 2 only standard 5 mentioned and mentioned only primary feedstock while the BP use both primary and secondary 2) section 3.2 is not filled in 3) section 3.3. is not filled in fully 4) in section 3.4 mentioned that primary feedstock from primary forest used and that is not true 5) . The NCR is upgraded to Major.
NC Status:	Closed

NC number NC-000149	NC Grading: Major
Standard:	SBP Standard 4: Chain of Custody
Requirement:	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>The following average conversion factor was established by BP based on the production records , which is in line with Branch republican norms of production and norms of consumption of raw materials for woodworking products» approved by the Ministry of Forestry in 2020: 2,4 solid m3 of secondary feedstock (sawdust and wood chips)) and primary feedstock for production of 1 tone pellets including the drier. The volume of feedstock used for drier is calculated based on norm taken from technical specification of drier and approved by director – 15,600 solid m3 per 24 working hours or 0.650 m3 per hour. Actual quantity of hours is registered and used to calculate consumed volume by the drier. The BP do not measure the volume of feedstock to calculate/ validate conversion factor</p>	
Timeline for Conformance:	3 months from the report finalisation
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

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:	06 Apr 2021
Other comments:	N/A