



NEPCon OÜ Evaluation of Pellets Power Lda Compliance with the SBP Framework: Public Summary Report

Re-assessment

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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:	Ondrej Tarabus
Audit team members:	ondrej tarabus
Name of the Company:	Pellets Power Lda
Company legal address:	Lugar do Freixo, 3450-116 Mortágua, Portugal
Company contact for SBP:	Filipa Rebelo
Company contact email:	f.rebelo@gesfinu.com
Company website:	N/A
SBP Certificate Code:	SBP-01-12
Date of certificate issue:	03 Mar 2021
Date of certificate expiry:	02 Mar 2026
Audit closing meeting date:	17 Nov 2020
Audit cycle:	Re-assessment

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 1: Feedstock Compliance Standard; SBP Standard 2: Verification of SBP-compliant Feedstock; 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):	Yes	<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):	Portugal	<input type="checkbox"/>
SBP-endorsed Regional Risk Assessments used: Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/	Not applicable	<input type="checkbox"/>
Chain of custody system implemented:	FSC: APCER-COC-150116	<input type="checkbox"/>
	Credit	<input type="checkbox"/>

2.1 Description of the company

BP is a biomass producer with a production situated in Mortagua, Portugal. Pellets Power Lda. is a part of Gesfinu group. Gesfinu is a privately owned family group operating in electricity generation and bio energy as main business activities, continuing in the real estate activity. BP is producing industrial and domestic wood pellets. BP is sourcing mostly primary feedstock for its production. The input material consists of branches, tree tops, stem wood from thinning as well as low quality roundwood from final felling. Insignificant share of the feedstock is secondary (woodchips and slabwood delivered from local sawmill). The input material is mostly delivered from Pine stands (*Pinus pinaster*). For purposes of drying there are also sourced some sawmill wood chips. Material is supplied locally. Input material can also be a mixture of species, in those cases the main species are eucalyptus, acacia from cleaning activities (acacia is considered an invasive specie in Portugal) and other deciduous in minor proportions. All the input material is therefore coming from Portugal. All Feedstock types are delivered to the pellet plant by trucks. Incoming feedstock is either FSC certified (FSC 100%, FSC Controlled Wood) or controlled according to the existing biomass producer (BP) FSC Controlled wood verification program. FSC controlled material verification program is applicable for feedstock originating from Portugal. Origin information is kept, and origin information access agreements are signed with feedstock suppliers. As a part of the Verification program BP is conducting supplier audits. The BP is implementing FSC credit system. However, the amount of FSC 100% feedstock is insignificant (no FSC volumes in the audit period were received), and therefore the BP had to implement SBP supply base evaluation of the feedstock received.. BP maintains a credit account for SBP inputs and outputs, separately from FSC credit account. BP is implementing Supply Base Evaluation (SBE). The BP has developed its own risk assessment with some indicators designated as specified risk and has implemented an internal supplier audit program as main part of their mitigation measures resulting in low risk for all these indicators. After the production, pellets are stored in BP's production storage or transported into the Aveiro harbour and loaded directly to the vessel.

2.2 Detailed description of the Chain of Custody system

The Organisation is holding valid FSC Chain of Custody and FSC Controlled wood certificate <http://info.fsc.org/details.php?id=a024000000BNTYaAAP&type=certificate&return=certificate.php>. Valid FSC system description and other documents exist. The Organisation is implementing FSC Credit system of claims. FSC Credit system is used for materials received as FSC certified, FSC Controlled wood and feedstock verified according to the Organisation's own controlled material verification system. The controlled material verification system of the organisation is covering only Portugal (the scope of the certificate covers four different sites, one of which is the Organisation, and risk assessment for this certification as a whole covers Portugal and Spain). No other feedstock is received. Supplier list is maintained. After the reception, incoming feedstock is unloaded into piles according to type of feedstock and load is registered into the recordkeeping system. All input material is weighted and recorded in tones. For the credit account purposed the volume of feedstock is recalculated by using the conversion factor of the production, FSC credit account is updated once in a month: data about received raw materials by FSC certification status and volume of sold pellets are recorded. In case of the FSC and / or SBP sales, the volume of sold pellets is withdrawn from the credit account.

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 this evaluation also covered the Supply Base Evaluation, and the mitigation measures describing herein.

The scope of the evaluation covered:

- Review of the BP's management procedures, including requirements designated in applicable SBP Standards and Instruction Documents;
- Review of the updated Supply Base Report;
- Review of the risk assessment results;
- Review of FSC system control points, analysis of the existing FSC CoC system;
- Evaluation of mitigation measures implemented for primary feedstock (including inspection of primary feedstock suppliers);
- Review of the records, calculations and conversion factors;
- Interviews with responsible staff;
- 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	OT	12,0
2. On-site (excl. travel time)	OT	12,0
3. Report writing	OT	4,0
4. Other	N/A	N/A

Audit Schedule			
Activity	Location	Auditor name	Date/time
<i>Opening meeting</i>	Remotely	OT	16 Nov 2020/9:00
<i>Review of procedures and interviews with staff (COC, mass balance, management system)</i>	Remotely	OT	16 Nov 2020/9:15
<i>Interview with sales department</i>	Remotely	OT	16 Nov 2020/11:00

<i>Interview with purchase department</i>	Remotely	OT	16 Nov 2020/11:30
<i>CoC review</i>	Remotely	OT	16 Nov 2020/13:00
<i>GHG calculation review</i>	Remotely	OT	16 Nov 2020/14:00
<i>Supply Base Evaluation</i>	Remotely	OT	17 Nov 2020/9:00
<i>Mitigation measures review and supplier audits</i>	Remotely	OT	17 Nov 2020/11:00
<i>Pesentation of the results</i>	Remotely	OT	17 Nov 2020/12:30

Auditor qualification		
Auditor name	Role	Qualification
ondrej Tarabus	lead auditor	Czech citizen, graduated in University of Life Sciences Prague, The Faculty of Forestry. He has participated in several FSC FM, FSC CoC, PEFC CoC, ISCC certification assessments in Czech Republic, Slovakia, Italy, Germany, Vietnam, Egypt, Spain, Romania, Bosnia and Herzegovina, Austria, etc. Ondřej Tarabus has been through lead assessor SBP training course and is experienced with carbon calculation using standards such as ISO 14 064, Carbon Footprint management or ISCC.

4.2 Description of evaluation activities

Description of the evaluation:

The audit started with an opening meeting, where the lead auditor introduced the auditing team, provided information about audit plan, methodology, auditor qualification, confidentiality issues, and assessment methodology and clarified verification scope. Auditor explained the aim and objectives of the audit, informed about the evaluation process, the 2 phases reassessment due to COVID restrictions and it was agreed the potential field work dates for the on site evaluation as soon as the COVID restrictions in Portugal improve. It was underlined the need to collect objective evidence through a combination of document review, site visits, interviews and discussions, explained the essence and importance of sampling aspect of the auditing.

After that audit team went through all applicable requirements of the SBP standards nr. 1, 2, 4 and 5 covering input clarification, existing chain of custody and controlled wood system, management system, CoC, recordkeeping/mass balance requirements, SBP risk assessment results and their justification, stakeholder consultation process, energy data and inputs and outputs of feedstock in the last period. *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.*

SBE and mitigation measures were evaluated remotely by intervening the responsible forest staff and review procedures and records of the company site inspections but the additional on site verification was requested to provide assurance of the compliance.

During the process overall responsible person for SBP system and responsible staff having key responsibilities within the system were interviewed. At the end of the audit finding were summarized and audit conclusion based on use of 3 angle evaluation method were provided to the company representatives.

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4.3 Sampling methodology

Purchase and sales records were sampled to ensure the verification is representative of the BP activity during the reporting period. The relevant staff were presented during the audit. Records about GHG and SAR data were evaluated from different months. Supplier audit reports and mitigation measures were also reviewed during the remote audit

4.4 CB stakeholder engagement

Stakeholder consultation was conducted by November 25th. Organizations from environmental, business and social sectors were conducted in particular more than 100 stakeholders were contacted. From the list it can be mentioned: international organizations as FSC, UICN, ILO, National organizations as environmental, forest and social NGOs, local associations, regional and national forest authorities, research

institutes and universities, etc. As the audit will be completed only after the Part 2, onsite FMU inspection, there is sufficient time to address any stakeholder comment.

4.5 Stakeholder feedback

No specific comments were received

5 Results

5.1 Main strengths and weaknesses

Strengths: The organization has implemented well functional system and has a close relationship with the suppliers and forest owners.

Weaknesses: Mostly primary feedstock is used in the production, difficulties to define thinning and final harvest material

5.2 Rigour of Supply Base Evaluation

The Supply Base Evaluation was implemented for primary feedstock sourced from Portugal, but the BP is currently only supplying feedstock from the Center Portugal region, no further than 150 km from the Pellets Power Lda plant. The BP is using the SBE Risk assessment developed by ANPEB (Portuguese Pellets Producer Association) for all Portugal but currently they are only working in the Central region. The BP implements SBE for the feedstock that is not received with FSC or PEFC claim.

The BP has identified 9 indicators with specified risk in their risk assessment for whose supplier audits are carried out to determine if the risk for the defined scope is specified or low:

2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.

2.2.1 Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them

2.2.2 Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).

2.2.3 Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).

2.2.4 Biodiversity is protected (CPET S5b).

2.2.6 Negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).

2.3.2 Adequate training is provided for all personnel, including employees and contractors (CPET S6d).

2.4.2 Natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).

2.8.1 Appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).

After this risk assessment was conducted, the stakeholder consultation process started with sending email to 114 stakeholders. The BP keeps records of communication with stakeholders. The BP has shared the results of the risk assessment with the stakeholders as well as proposed mitigation measures.

As central part of the mitigation measures, the BP has conducted supplier audits and as result of this process only 4 suppliers (out of more than 40) have been approved for SBE. The BP has prepared several checklist to verify the supplier forest management implementation under each risk indicator. (see section 9 in this report for more details about the key points to evaluate mitigation measures under each specified risk) maps with protected areas as well as list of protected species which are used during the supplier audits to identify the extend of risk in each area. The supplier audit checklists contain requirements for evaluation of legal aspects, determination of scope (species, type of harvest and area), ecological aspects (such as biodiversity, HCVs for each category, fire protection elements), soil quality, water courses and ground water, forest fires and pest, and health and safety requirements together with appropriate training. Normally audits start at the BP office where the harvesting site is evaluated using available maps with protected areas and species and other supplier documentation, agreements, etc. are evaluated. Later on, the supplier office is visited where the forest management plan is evaluated (when applicable) and additional information about sites are collected. Finally, the audit continues at the forest site where the workers are interviewed, and the forest conditions are evaluated using the checklist. In case the evaluation of all 9 indicators results in low risk the risk is confirmed as low and the material is received as SBP compliant. In case there would be identified that any of the indicator can't be assessed as low risk, the material can't be received as SBP compliant and the supplier is not approved. After the supplier audits the BP has concluded that for the 4 selected suppliers' low risk can be considered for all indicators. The supplier verification is repeated annually.

The SBE is well implemented and address the scope of the BP. The system is strong enough to conclude low risk for the material sourced. The defined SBE scope is adequate to the specific characteristics of the supply base. The audit however need to confirm the maintenance of the system by onsite audit which will take place when the situation with the pandemic restriction will allow it.

5.3 Collection and communication of data

The BP has provided good overview of the requirements for energy data collection. The responsible person has benefited from previous experience with other certification schemes (like GGL) and other experience energy data collection.

5.4 Competency of involved personnel

Staff members involved into the SBP system management and implementation, include the quality manager, supply raw materials responsible and industrial director as well as administrative staff. Interviewed staff demonstrated awareness of their responsibilities within SBP system.

The SBE was mainly implemented by Supply raw materials responsible (holding M.Sc. degree in forestry) and the quality manager, and between them, they have implemented the system. Supply raw materials

responsible is covering the implementation of the mitigation measure and providing input to about forest specific issues while the quality manager is responsible for the process part of the work.

Supply raw materials responsible has provided good knowledge in relevant fields, including project management and recognition of HCVF aspects, and implementation of relevant mitigating measures during the site visits.

6 Review of company's risk assessments

6.1 Overview of company's risk assessments and mitigation measures

The BP has developed the risk assessment with evaluation of each individual indicator. The risk assessment outlines "specified risk" for indicators 2.1.2, 2.2.1, 2.2.2., 2.2.3., 2.2.4, 2.2.6., 2.3.2, 2.4.1. and 2.8.1. To determine whether the risk can be considered as low or specified the organization has conducted supplier audits and evaluated the compliance with these indicators.

Risk assessment taking into consideration results of the supplier audits is presented in Table 2. It is concluded that after the situation for each indicator was evaluated at the supplier level (for the suppliers included in the SBE) by the BP lead to conclusion that the final risk level for all indicators can be considered as "low risk". Pellets Power Lda has developed the following mitigation measures according to each indicator, basically all are structured in the same way:

1. The BP only works with a limited number of suppliers (4) to improve the control and the mitigation measures implementation. All suppliers are visited prior to be validated as SBE supplier.

2. The BP mitigate the risks at the supplier level. Each supplier is evaluated for each specified indicator under different situations to ensure all different risks and different factors as forest, ownerships, species, etc. are covered. Once the supplier has been evaluated and approved as SBE supplier, the feedstock can be considered as SBP.

3. The audit supplier process is developed as follows:

- Desk and onsite audit in the supplier facilities is conducted to evaluate general procedures and legal issues as: safe and safety procedures, forest practices, etc. Geographic areas of work are assessed and the sampling to conduct the onsite visits at the level of FMU is defined. At this stage if specific forest management manual, H&S risk and procedures, list of potential species or HCV information is needed by the supplier, the BP shares manuals and checklist with the supplier.

- After that FMUs on site visit are conducted where all checklist (Part 1, 2, 3, 4 and 5) are evaluated. More than one site visit used to be requested in order to evaluate the supplier performance in all applicable situations and specified risks. In these forms there are also good practices and limitations adapted to each risk. The on site audit are structured in 5 audit checklists:

- o Cover forest data (type of forest, hectares, ownership authorization, harvesting manifesto, etc). Part 1

- o Cover forest workers health and safety, harvesting residues, working contracts, etc. Part 2

- o Cover HCV and biodiversity verification. Part 3 and annex 4 for biodiversity

- o Cover assessment of impacts, soil quality, negative impacts over water resources and fires and pests. Part 5

All checklist from part 1 to 5 are kept by the BP and a summary with the main finding under each indicator and FMU visit is recorded.

Supplier audits, trainings and contact with all SBE supplier are managed by the BP purchase manager, forest engineer in PP Lda.

4. If a specific training/notification is identified by the BP staff, good practices manuals are shared with the supplier and is also trained according. The BP can consider the NCR as an observation or opportunity of improvement or as a NCR where can cause the supplier suspension as SBE approved. The BP has specific procedures for this issue.

6.2 Specified risk indicators and mitigation measures

Country/Area	Indicator	Specified risk description	Mitigation measure
Portugal	2.1.2 The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.	Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.	<p>Before site visit the HCV information is search and identified;</p> <p>Fill the audit form;</p> <p>Fill the audit suppliers table vs risk results;</p> <p>If necessary mitigation with training or notify the suppliers and logging workers</p>
Portugal	2.2.3 The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural	Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).	<p>Before site visit the <i>ecosystems and habitats</i> information is search and identified;</p> <p>Habitats Directive; Before each site visit the HCV information is search and identified;</p> <p>Fill the audit form;</p>

	state (CPET S8b).		<p>Fill the audit suppliers table vs risk results;</p> <p>If necessary mitigation with training or notify the suppliers and logging workers (example <i>species of birds</i>, protected areas...);</p>
Portugal	2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).	Biodiversity is protected (CPET S5b).	<p>Before site visit the <i>Biodiversity</i> information is search and identified;</p> <p>Fill the audit form;</p> <p>Fill the audit suppliers table vs risk results;</p> <p>If necessary mitigation with training or notify the suppliers and logging workers</p>
Portugal	2.3.2 Adequate training is provided for all personnel, including employees and contractors (CPET S6d).	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).	<p>Fill the health and safety audit form;</p> <p>Fill the audit suppliers table vs risk results;</p> <p>If necessary mitigation with training or notify the suppliers and logging workers;</p> <p>If necessary delivery an informative manual to suppliers with the good forest practices.</p>
Portugal	2.8.1 The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and	Appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).	<p>Fill the audit form;</p> <p>Fill the audit suppliers table vs risk results;</p> <p>If necessary mitigation with training or notify the suppliers and logging workers</p> <p>If necessary delivery an informative manual to suppliers</p>

	safety of forest workers (CPET S12).		with the good practices.
Portugal	2.2.1 The BP has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.	Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them	<p>Before site visit the information is search and identified;</p> <p>Fill the audit form;</p> <p>Fill the audit suppliers table vs risk results;</p> <p>If necessary mitigation with training or notify the suppliers and /or logging workers.</p>
Portugal	2.2.2 The BP has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b)	Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).	<p>Before site visit the information is search and identified;</p> <p>Fill the audit form;</p> <p>Fill the audit suppliers table vs risk results;</p> <p>If necessary mitigation with training or notify the suppliers and /or logging workers;</p> <p>If necessary delivery an informative manual to suppliers with the good practices.</p>
Portugal	2.2.6 The BP has implemented appropriate control systems and procedures to verify that	Negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).	<p>Before site visit the information is search and identified;</p> <p>Fill the audit form;</p>

	negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).		<p>Fill the audit suppliers table vs risk results;</p> <p>If necessary mitigation with training or notify the suppliers and /or logging workers;</p> <p>If necessary delivery an informative manual to suppliers with the good practices.</p>
Portugal	2.4.2 The BP has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).	Natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).	<p>Before site visit the information is search and identified;</p> <p>Fill the audit form;</p> <p>Fill the audit suppliers table vs risk results;</p> <p>If necessary mitigation with training or notify the suppliers and /or logging workers;</p> <p>If necessary delivery an informative manual to suppliers with the good practices.</p>

7 Non-conformities and observations

NC number NC-000254	NC Grading: Minor
Standard:	SBP Standard 4: Chain of Custody
Requirement:	5.1.2 The legal owner shall implement all aspects of the SBP-approved CoC system requirements for the SBP feedstock and 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. Note: SBP feedstock or biomass will not necessarily enter into the scope of the SBP-approved CoC system certification, but the SBP-approved CoC system CoC processes and requirements shall extend to SBP feedstock and biomass.
Description of Non-conformance and Related Evidence:	
The BP did not established different conversion factor for primary and secondary feedstock although the conversion is different due to moisture and physical form which influence the conversion of the material. As the secondary feedstock represents only some 4% of the total inputs and it is not foreseen to change in the next audit period, this non-conformity is classified 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:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number NC-000255	NC Grading: Minor
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.4
Requirement:	6.9.1 Different types of fuels may be used in the plant. Either fossil fuels, such as: - diesel oil; - gasoline; - natural gas; - propane; - LPG; - butane, - other to be specified. Or biomass fuels, such as: - sawmill residues; - forest residues; - imported bark - bark from onsite

	debarking of roundwood - diverted biomass product (e.g. material exiting the dryer); - non-wood biomass to be specified - biodiesel; - bioethanol; - other to be specified For every type of fuel used, specify fuel consumption during the reporting period in: - litres; - kg; or - Nm ³ / metric tonne biomass. For every type of fuel used, specify the process: - chipping/crushing, - handling, - burner for drying, - boiler, - onsite CHP, - 3rd party CHP, - emission control, - offsite chipping, - multiple or other use to specify
Description of Non-conformance and Related Evidence:	
Evidence about material used – the BP did not presented strong evidence about the factor which is used to calculate how much material was used in the dryer. Also, the amount of used feedstock in the production is calculated based on conversion factor, considering number of estimations.	
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

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):	Pilar Gorriá
Date of decision:	13 Apr 2021
Other comments:	N/A