



# NEPCon OÜ Evaluation of Forwarder, Private Unitary Enterprise Compliance with the SBP Framework: Public Summary Report

Main (Initial) Audit

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**The promise of good biomass**



# 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:            | Siarhei Minkevich                     |
| Audit team members:           | none                                  |
| Name of the Company:          | Forwarder, Private Unitary Enterprise |
| Company legal address:        | N/A                                   |
| Company contact for SBP:      | Mikhail Ivanovich Poddubitsky         |
| Company contact email:        | for490@mail.ru                        |
| Company website:              | N/A                                   |
| SBP Certificate Code:         | SBP-08-40                             |
| Date of certificate issue:    | 26 May 2021                           |
| Date of certificate expiry:   | 25 May 2026                           |
| Audit closing meeting date:   | 05 May 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) |
|---------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| <b>Primary Activity:</b>                                                  | Biomass Producer                                                                                                                                                                                                                                 | <input type="checkbox"/>              |
| <b>Approved Standards:</b>                                                | 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"/>              |
| <b>Includes Supply Base Evaluation (SBE):</b>                             | No                                                                                                                                                                                                                                               | <input type="checkbox"/>              |
| <b>Includes communication of Dynamic Batch Sustainability Data (DBSD)</b> | Yes                                                                                                                                                                                                                                              | <input type="checkbox"/>              |
| <b>Includes Group Scheme</b>                                              | No                                                                                                                                                                                                                                               | <input type="checkbox"/>              |
| <b>Products</b>                                                           | Pellets                                                                                                                                                                                                                                          | <input type="checkbox"/>              |

|                                                                                                                                                                                |                    |                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|--------------------------|
| <b>Feedstock types:</b>                                                                                                                                                        | Secondary          | <input type="checkbox"/> |
| <b>Feedstock origin (countries):</b>                                                                                                                                           | Belarus            | <input type="checkbox"/> |
| <b>SBP-endorsed Regional Risk Assessments used:</b>                                                                                                                            | Not applicable     | <input type="checkbox"/> |
| <b>Public link:</b><br><a href="https://sbp-cert.org/documents/standards-documents/risk-assessments/">https://sbp-cert.org/documents/standards-documents/risk-assessments/</a> |                    | <input type="checkbox"/> |
| <b>Chain of custody system implemented:</b>                                                                                                                                    | FSC: NC-COC-026727 | <input type="checkbox"/> |
|                                                                                                                                                                                | Transfer           | <input type="checkbox"/> |

## 2.1 Description of the company

The report is about newly commissioned pellet plant. Organisation has own sawmill plant. Therefore, BP is a wood processing (primary and secondary) company located in Gomel region, Belarus. Total annual production capacity of pellet plant is 18 000 tones. Company runs pellet production, as well as sawmill production, which supplies secondary feedstock (sawdust) with FSC 100% claim to the pellet plant. Sawdust is used in pellet production. The round wood used for primary production originates from Belarus and has FSC 100% claim. The BP implements FSC transfer system and produced biomass will be sold with FSC 100% claim. The biomass will be transported by railway to harbours in Latvia and Lithuania (DAP delivery conditions of Incoterms). Pellet plant was commissioned in the begging of 2021. Biomass will be delivered to the customer by means of railway service (railway wagons). Occasionally the deliveries can be made by the trucks (however it is not common mean of deliveries for export, but more typical transport for the internal market).

## 2.2 Detailed description of the Chain of Custody system

The BP holds valid FSC Chain of certificate <https://info.fsc.org/details.php?id=a023300000dpQoNAAU&type=certificate> BP implements FSC transfer system of claims – all round wood for primary processing is sourced with FSC 100% claim. After the reception, incoming volume of the primary feedstock (saw logs) is registered in Organisation's database and processed. Pellets are produced of the FSC 100% secondary feedstock (sawdust), originating from own primary processing. In the reporting period Organisation does not purchased any secondary feedstock from suppliers. Organisation purchased only FSC 100% round wood for their sawmill. Sawdust came only from own sawmill production.

### 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 Evaluation process

### 4.1 Timing of evaluation activities

| <i>Audit Level of Effort (LoE)</i> |                   |                      |
|------------------------------------|-------------------|----------------------|
| <b>Activity</b>                    | <b>Auditors</b>   | <b>Auditor hours</b> |
| 1. Preparation                     | Siarhei Minkevich | 4,0                  |
| 2. On-site (excl. travel time)     | Siarhei Minkevich | 16,0                 |
| 3. Report writing                  | Siarhei Minkevich | 12,0                 |
| 4. Other                           | N/A               | N/A                  |

| <b>Audit Schedule</b>                                                               |                       |                     |                   |
|-------------------------------------------------------------------------------------|-----------------------|---------------------|-------------------|
| <b>Activity</b>                                                                     | <b>Location</b>       | <b>Auditor name</b> | <b>Date/time</b>  |
| <i>Opening meeting</i>                                                              | Office                | Siarhei Minkevich   | 22 Apr 2021/08:30 |
| <i>Chain of custody review (site tour); staff interview; document review onsite</i> | Production facilities | Siarhei Minkevich   | 22 Apr 2021/08:45 |
| <i>Documents and procedures review, SAR data, staff interview.</i>                  | Office                | Siarhei Minkevich   | 22 Apr 2021/10:45 |

|                                                                                                        |        |                   |                   |
|--------------------------------------------------------------------------------------------------------|--------|-------------------|-------------------|
| <i>Updated documents and procedures review (SBR, SAR and energy use primary data); staff interview</i> | Office | Siarhei Minkevich | 05 May 2021/08:30 |
| <i>Closing meeting</i>                                                                                 | Office | Siarhei Minkevich | 05 May 2021/16:30 |

| Auditor qualification |             |                                                                                                                                                                                                                           |
|-----------------------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Auditor name          | Role        | Qualification                                                                                                                                                                                                             |
| Siarhei Minkevich     | SBP auditor | PbN (NEPCon) SBP auditor, FSC FM/COC and FSC CoC/CW lead auditor. He has successfully passed SBP lead auditor training in Germany in September 2019 and participated in several SBP assessments in Belarus and Lithuania. |

## 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:

All SBP related documentation connected to the SBP as well as FSC CoC documentation of the organisation, including SBP Procedure, SAR and GHG data calculations, Supply Base Report, FSC system description was provided by the company in the beginning of the assessment, which started with an opening meeting attended by the representatives from Organisation's management and staff.

Auditor 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.



A roundtrip around BP's pellet production was undertaken. During the site tour, applicable records and documents were reviewed, staff was interviewed. Specific critical control points that were evaluated: reception, identification of material, segregation, volumes recording / accounting, conversion factor 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/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.

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.

Impartiality commitment: NEPCon commits to using impartial auditors and our clients are encouraged to inform NEPCon management if violations of this are noted. Please see our Impartiality Policy here: <http://www.nepcon.org/impartiality-policy>.

### **4.3 Sampling methodology**

Production facilities were checked without any exclusion. Reviewing of documents was based on sampling approach - several months were randomly selected (waybills and invoices for the selected months). All responsible personnel was interviewed.

### **4.4 CB stakeholder engagement**

The stakeholder consultation was carried out before assessment in 2020 (2020.11.24) by sending direct email to different stakeholder categories (more than 120 recipients). No comments from the stakeholders have been received. List of informed stakeholders includes such groups of stakeholders as FSC National Initiative, environmental and social NGOs, FSC-certified companies in the region, scientific and educational entities, indigenous peoples' communities (where applicable), state forestry authorities, trade unions etc.

### **4.5 Stakeholder feedback**

No comments from the stakeholders have been received before assessment 2021.

## **5 Results**

### **5.1 Main strengths and weaknesses**

Strengths: 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 section 7 “Non-conformities and observations”

### **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; gasoline for finished pellet handling, diesel for feedstock handling, shipping and for biomass transportation to customer. Electricity consumption value is based on engineering calculations and tests performed by BP; diesel consumption value is mostly based on actual refuelling data obtained in accountancy.

### **5.4 Competency of involved personnel**

Overall, BP staff showed good understanding of knowledge of all applicable SBP requirements. The following key staff members are involved to SBP certification: SBP related staff responsibilities are presented in Section 3.2 of the SBP Procedure. Interviewed staff was well familiar with their responsibilities. Generally, very few staff members are involved into SBP certification: SBP responsible/director (maintaining of the management system, staff training, trademark use), production manager (collection of energy use data, moisture measurements), accountant (verification of incoming invoices and transport documents, performance of outgoing invoices and transport documents). Prior and during SBP audit 2021, BP was supported by external consultant – private consultancy company from Minsk, who also have provided relevant training to BP staff.

## 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-000351                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | NC Grading: Minor                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Standard:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.3                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Requirement:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 6.4.5 For reporting mass F, the total mass of material processed during the Reporting Period for biomass production must be recorded including the share that is diverted as biomass fuel. If part (or optionally the totality) of the Feedstock Group is diverted as biomass fuel, then consider the total mass as received in F and add also a corresponding line in Table 3.5 of the SAR where the raw tonnage is reported for the share used as biomass fuel (see paragraph 6.9.5). |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p>The organization keeps records of the receipt and consumption of sawdust for the production of fuel pellets. The production has recently started operations after a lengthy pre-commissioning phase. The BP records the feedstock and biofuel. According to the national requirement the volume of the sawdust is assessed using approved coefficients. Slabs, edgings, sawdust volume that appears in production process is substantiated by conversion factors. Sawdust volume calculations are based on a geometrical method, conversion factor (according to STB) is used. The following consumption rates have been adopted: 1.95 m<sup>3</sup> of feedstock (sawdust) per ton of pellets; 0.49 m<sup>3</sup> sawdust for heat generation. However, at the time of the main assessment, no documentary evidence was provided - acts of measuring the consumption of feedstock and biofuels at the new production. The rates of 1.95 and 0.49 are preliminarily determined without an order, based on the first data on the results of production.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Timeline for Conformance:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | By the next surveillance audit, but no later than 12 months from report finalisation date                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Evidence Provided by Company to close NC:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Findings for Evaluation of Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>NC Status:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Open                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

| NC number NC-000353 | NC Grading: Minor                                       |
|---------------------|---------------------------------------------------------|
| <b>Standard:</b>    | SBP Standard 2: Verification of SBP-compliant Feedstock |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Requirement:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 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. |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                         |
| SBR has been prepared and made publicly available on SBP Audit Portal. The report in general meets requirements. However not all applicable fields are filled in: Provide a general description of the forest resources (...forest composition, profile of adjacent lands). Describe the harvesting type which best describes how your material was sourced Was the forest in the Supply Base managed for a purpose other than for energy markets? For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling? Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? SBR does not have explanation on the following questions (see Description in SBR Template): Include a comparison of the scale of harvesting compared to other forest based industries in the region. The description must include a description of the forestry management practices or land management practices used. |                                                                                                                                                                                                         |
| <b>Timeline for Conformance:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | By the next surveillance audit, but no later than 12 months from report finalisation date                                                                                                               |
| <b>Evidence Provided by Company to close NC:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | N/A                                                                                                                                                                                                     |
| <b>Findings for Evaluation of Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | N/A                                                                                                                                                                                                     |
| <b>NC Status:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Open                                                                                                                                                                                                    |

| NC number NC-000350                                                                                                                                                                                                                                                                                                                                                                        | NC Grading: Observation                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| <b>Standard:</b>                                                                                                                                                                                                                                                                                                                                                                           | SBP Standard 2: Verification of SBP-compliant Feedstock                                   |
| <b>Requirement:</b>                                                                                                                                                                                                                                                                                                                                                                        | 15.3 The BP management system shall document all necessary procedures.                    |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                                                                                                                                                                                                                |                                                                                           |
| At the moment of assessment there is no data confirming "Average lower heating value". It is newly commissioned plant and the BP has not applied yet to make a lab analysis. Average lower heating value 17,5 MJ/kg was taken as average value based on the experience from organisation' partner BP. It is recommended to contact an independent laboratory for laboratory analysis data. |                                                                                           |
| <b>Timeline for Conformance:</b>                                                                                                                                                                                                                                                                                                                                                           | By the next surveillance audit, but no later than 12 months from report finalisation date |
| <b>Evidence Provided by Company to close NC:</b>                                                                                                                                                                                                                                                                                                                                           | -                                                                                         |
| <b>Findings for Evaluation of</b>                                                                                                                                                                                                                                                                                                                                                          | -                                                                                         |

|                   |      |
|-------------------|------|
| <b>Evidence:</b>  |      |
| <b>NC Status:</b> | Open |

| <b>NC number NC-000352</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>NC Grading: Observation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Standard:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | SBP Standard 4: Chain of Custody                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Requirement:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 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. |
| <b>Description of Non-conformance and Related Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| BP has valid FSC CoC Certificate NC-COC-026727. Details are available at <a href="https://info.fsc.org/details.php?id=a023300000dpQoNAAU&amp;type=certificate">https://info.fsc.org/details.php?id=a023300000dpQoNAAU&amp;type=certificate</a> Feedstock w3.2 sawdust has many tree species in scope. However, fuel pellets are going be produced from pine and spruce only. Audit onsite confirmed that BP works at the moment of assessment only with this two tree species. It is recommended to pay attention on the issue of tree species composition. PGS should be updated in timely manner if new tree species enter into the production of pellets |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Timeline for Conformance:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Evidence Provided by Company to close NC:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Findings for Evaluation of Evidence:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>NC Status:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

## 8 Certification decision

| Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken: |                        |
|-----------------------------------------------------------------------------------------------------------------------------------|------------------------|
| <b>Certification decision:</b>                                                                                                    | Certification approved |
| <b>Certification decision by (name of the person):</b>                                                                            | Pilar Gorriá Serrano   |
| <b>Date of decision:</b>                                                                                                          | 25 May 2021            |
| <b>Other comments:</b>                                                                                                            | N/A                    |