SBP

Sustainable Biomass Program

NEPCon Evaluation of Alstrup Skovservice ApS Compliance with the SBP Framework: Public Summary Report

Second Surveillance Audit

www.sbp-cert.org

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

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

Document history

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1 Overview

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Current report completion date:	05/Jun/2019
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Company contact for SBP:	Gert Alstrup, Owner. Email: info@alstrupskov.dk, Mob: +45 2118 2929
Certified Supply Base:	The certified Supply Base covers all of Denmark
SBP Certificate Code:	SBP-01-81
Date of certificate issue:	14/Jun/2017
Date of certificate expiry:	13/Jun/2022

This report relates to the Second Surveillance Audit

2 Scope of the evaluation and SBP certificate

Scope of this evaluation is based on SBP standards 1; 2; 4; and 5. The geographical scope of the Supply Base was confirmed to be the following regions of Denmark: Midtjylland, Syddanmark and Nordjylland. The risk evaluation and mitigating measures in the Supply Base Evaluation are applicable to all of Denmark.

Scope description: “Production of woodchips for use in energy production, storage at the company’s storage address and sale at different energy producers in Denmark. The scope includes supply base evaluation for primary feedstock from Denmark”.

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;
- Review of PEFC system control points, analysis of the existing PEFC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients;
- GHG data collection analysis.
- Evaluation of mitigation measures implemented

4 SBP Standards utilised

4.1 SBP Standards utilised

Please select all SBP Standards used during this evaluation. All Standards can be accessed and downloaded from https://sbp-cert.org/documents/standards-documents/standards

☒ SBP Framework Standard 1: Feedstock Compliance Standard (Version 1.0, 26 March 2015)

☒ SBP Framework Standard 2: Verification of SBP-compliant Feedstock *(Version 1.0, 26 March 2015)*

☒ SBP Framework Standard 4: Chain of Custody *(Version 1.0, 26 March 2015)*

☒ SBP Framework Standard 5: Collection and Communication of Data *(Version 1.0, 26 March 2015)*

4.2 SBP-endorsed Regional Risk Assessment

The BP has used the SBP-endorsed Regional Risk Assessment for Denmark, which is available for download at this address: https://sbp-cert.org/documents/risk-assessments

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

Alstrup Skovservice ApS is a private limited company under sole management of the owner Gert Alstrup. The company offers forest contractors services to Danish forest and land owners, predominantly in the central part of Jutland.

The organization purchases all its feedstock in the Danish regions Midtjylland, Syddanmark and Nordjylland, with the vast majority coming from the the Midtjylland region in the central part of Jutland. All feedstock is primary feedstock, and can be purchased either as standing volume, as fuel wood in stack in the forest of origin or very occasionally as fuel wood or chips from other suppliers working and sourcing within the Supply Base. In all cases the stand of origin is known, and when buying wood chips from other companies, the BP takes full responsibility for all feedstock classification and risk mitigation measures. The organization can buy wood as PEFC certified, but does not foresee this, and will mainly rely on sourcing feedstock as SBP Compliant from its own Supply Base Evaluation. The organization is implementing appropriate mitigating measures in relation of the specified risks identified, and rather than implementing a Supplier Verification Program assumes all responsibility classification of feedstock and all necessary mitigating measures in all forests and stands of origin of the supplied feedstock.

The BP is supplying the woodchips produced directly from the forest via truck to the customers, which are combined heat and power plants and district heating plants. However, the organization also maintains a storage yard at the near-by address of Birkelundvej 8, Vorgod-Barde, 6920 Videbæk. The storage facilities consist of an open yard with segregation signage and the expected capacity is app 2800 tonnes in three separate stacks.

Alstrup Skovservice Aps is a member of the PEFC CoC group certificate held by industry association Danske Maskinstationer & Entreprenører. This PEFC group certificate is issued by NEPCon Certificering ApS, and has the PEFC CoC certificate number NC-PEFC/COC-025953

5.2 Description of Company's Supply Base

General description of Danish forests and forestry

Forests cover approx. 620,000 ha in Denmark, corresponding to approx. 14.4% of the country's total area. This area is expected to increase over time. Total standing timber in Danish forests is 130 million m3.

Standing timber in the forests has been increasing rapidly from the 2000 statement until today. This is a result of the steadily increasing forest area and probably an increase in standing timber per hectare.

Generally, Danish forests include a wide variety of wood species of which the most common species are: Norway spruce 15%, beech 14% and oak 10%. The numbers for the other wood species are: pine 11%,

silver spruce 6%, Nordmann fir 5%, noble fir 2%, other fir species 10%, Sycamore maple 4%, birch 7%, ash 3% and other broadleaves 9%. In addition to this, unstocked areas are 4%. Broadleaves make up 47 per cent of the total wooded area whereas conifers make up 49 per cent. The rest is unstocked areas and areas where a particular wood species could not be determined. None of the wood species belong to the CITES or IUCN species.

Approx. 2000 species are listed on the Danish Red List, and many of these species are related to forests, old forests in particular. Areas in which one or more red list species have been identified are often registered as Natura 2000 areas, protected by the Danish Forest Act and/or the Danish Nature Protection Act.

The estimated total number of forest estates in Denmark is 24,000. 89% of the total number of forest estates has a size between 0.5 and 20 ha.

Most of the forest area is privately owned, either by individuals (59%) or by companies (10%) and foundations (6%). The Danish state forests make up 19% of the total forest area, while the area owned by municipalities and public institutions is 6%. This means that the Danish forest structure includes many private owners with forest areas of less than 20 ha.

Atypically, Danish forestry legislation has no requirements as to how each estate plans forestry, nor does the forest owners have to apply for or report cutting in their forests.

Danish forest owners are well-organised in various local and national associations. Dansk Skovforening (Danish Forest Association) is the trade organisation of private forest owners.

Moreover, up to 6,000 owners of small forests are organised in local forest owner associations which help owners with advice and management of their forests and are also involved in forest policy. Similarly, many private forest owners also work with HedeDanmark and other forestry consultancies.

Two certification options exist in forest management: PEFC and FSC. The areas owned by the Danish states have been certified according to both standards. In private and municipal forests, some 56,000 ha have been certified according to PEFC and 20,161 ha according to FSC.

Total income in the production of forest products in Denmark is approx. DKK 1 billion. The sale of energy wood amounted to DKK 300 million in 2015.

General description of Danish windbreaks

Planted windbreaks are a tradition in Denmark. The systematic planting of windbreaks started in the 1930s. The first major windbreak planting guilds were set up in 1967 and windbreaks with mainly 3 and 6 rows of broadleaves were introduced. Since then, various subsidies have existed to establish windbreaks and most have been established with subsidies. Today, Denmark is estimated to have some 80,000 km of windbreaks.

Windbreaks planted with subsidies must be maintained and cannot be removed.

Description of the supply base

Alstrup Skovservice's supply base is Danish forests, windbreaks, scenic areas and urban plantations, mainly in Mid-Jutland. In a few cases, biomass is harvested in South and North Jutland.

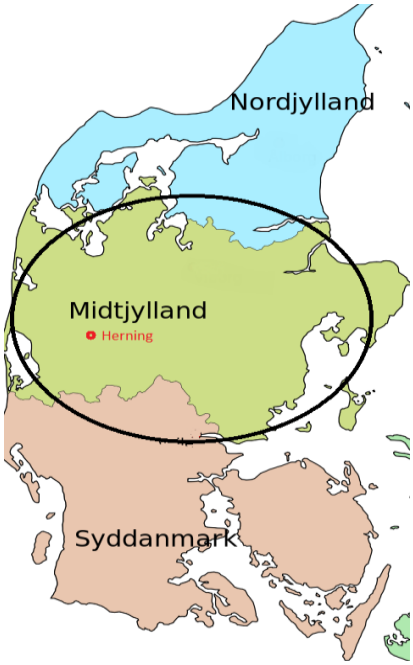

Figure 1 Supply Base

Alstrup Skovservice is a forest contractor that produces and sells wood chip. Wood chip production is approx. 35,000-45,000 tonnes a year; 50% of the wood chip is produced in areas outside forests, mainly windbreaks and small plantations and in connection with nature projects. The base also includes clearing of trees and shrubs in connection with developments and expansion of infrastructure in Denmark.

In the forests, the base is thinning in conifers and roundwood from conifer deforestation while the rest is branches and tops from both broadleaves and conifers.

Description of jobs

Thinnings:

In windbreaks, the base mainly consists of the removal of nurse trees and pollarding of shrubs but in order to keep the sheltering effect of the windbreak. The work is carried out using feller bunchers and feller forwarders. In the forest, thinnings are carried out by feller bunching in connection with the running of tracks and thinning of younger standing crop. The subsequent chipping is carried out using an off-road chipper or a truck chipper.

Tree tops:

Chipping of tops and branches from conifers and broadleaves in connection with the deforestation of middle-aged or old broadleaves and conifers. Tops are often interconnected in stacks and chipped by the roadside.

Round timber:

Produced as a by-product from the felling of conifers where timber is also produced. The chip utilised timber of a low quality which cannot be used for products of high quality, such as timber. Felled using a harvester,

forwarded to a solid road, chipped by the roadside or transported to a storage yard where the chipping is carried out.

Clearings:

Carried out by manual felling and subsequent forwarding or using a feller forwarder. Wood is often interconnected in stacks and chipped by the roadside. Clearing of tree regeneration in connection with Nature projects carried out in dialogue or in direct collaboration with the specific authorities.

Table 1 Distribution raw material input in %

	Conifers	Broadleaves	Mixed
Controlled feedstock			
SBP-Compliant primary	60	30	10
SBP-Compliant Secondary			
SBP-Compliant Tertiary			
SBP non-compliant			

Link to the company's full supply base report including the supply base evaluation:
https://alstrup-skovservice.dk/certifikater.htm

5.3 Detailed description of Supply Base

Wood chip resource:

Resource area (ha): Approx. 216,000 ha of forest (Midtjylland, Syddanmark and Nordjylland)
Ownership (ha): 430.509 ha privately owned, 27.696 owned by foundations, 150.298 ha public owned, 11.997 ha unknown)

Forest type (ha): 100% Temperate forest

Forestry (ha): Different kinds of forest management practice dependent of forest owner

Certified forest area distributed on schemes (%):
0% certified to a SBP-approved Forest Management certification system
100% not certified to a SBP-approved Forest Management certification system

Feedstock:

Total amount produced: 35,000 - 45,000 T
Volume of primary feedstock: 35,000 - 45,000 T
SBP-approved certification schemes: 0 %
Wood species included: see list in the SBR
Amount from primary forests (virgin forests): 0 T
Percentage from virgin forests: N/A
Volume of secondary feedstock: 0%
Volume of tertiary feedstock: 0%

For further information see the full Supply Base Report. Link to the company's full supply base report including the supply base evaluation: https://alstrup-skovservice.dk/certifikater.htm

5.4 Chain of Custody system

Alstrup Skovservice is a member of the PEFC CoC group certificate held by industry association Danske Maskinstationer & Entreprenører. This PEFC group certificate is issued by NEPCon Certificering ApS, and has the PEFC CoC certificate number NC-PEFC/COC-025953

The organization implements a PEFC CoC system based on physical segregation. Therefore, SBP claims can only be made for material that is delivered directly from the wood chipper in the forest, or via the storage yard at the BP's storage address, where physical segregation is ensured, and no uncontrolled material ("other biomass") has been added.

All relevant information with regards to volume tracking and verification of origin is handled in the BP's system for tracking projects and storage yard volumes, and production orders and in the system from in- and outbound sales documents.

6 Evaluation process

6.1 Timing of evaluation activities

The SBP Annual surveillance audit was carried out on March 26th, 2019 (office audit) and March 28th (field audit) and it included audit the Alstrup Skovservice main office in Vorgod-Barde near Videbæk, Denmark, and of visits to a total of 11 sites where there have been or currently are being sourced feedstock and produced wood chips.

Total of 2,50 days were used for this evaluation – 1 day of preparations, 0,75 day at the BP main office site and 0,75 day for audits at the forests / stands of origin. On the basis of 100 locations had been used for wood chip production in the reporting period (2018 calendar year) a random sample of $0.8\ x\ \sqrt{100}$ = 8 sites in Regions Midtjylland and Syddanmark. Time used for reporting and administration is not included in these figures.

The SBP surveillance audit was conducted in accordance with the plan below. Please note that the field visits were conducted after consulting the Biomass Producer's records of ongoing and recent wood chip production engagements. The field visits started and ended in the field, including a summary of the observations from the field visits. A closing meeting was conducted in the main office in the afternoon of March 28th, 2019. During this closing meeting the auditor provided a summary of the findings from the field visits, and a formal communication about the result of the audit and NCR raised was provided to the owner-manager.

March 26th, 2019

Time	Activity	Location
9.00 – 9.30	Opening Meeting. Introduction of participants. Review of the agenda.	Alstrup Skovservice Main office
9.30 – 12.00	Brief presentation of the BP and any changes since last year. • Supply Base Report and SBE, and annual update • Documented procedures (Management system), including traceability, legality, health and safety, risk mitigation measures, staff qualifications and competences, Supplier Verification Program, system for complaints handling • Training activities and registration of completed training Interviews with staff	Alstrup Skovservice Main office

	Planning the field trip • Review of projects carried out • Planning of interviews with machine operators and any other staff	
12.00 – 12.30	Break	
12.30 – 14.00	Review of the PEFC CoC traceability system • Procedures • Review of documentation: (Projects, maps, purchase invoices) • Review of sales documentation (invoices and DTS) Visit of storage site (located at the same address as the BP office)	Alstrup Skovservice Main office
14.00 – 16.30	Review of the system for the collection and reporting of energy and emissions data: SAR • Reporting period • Transport data • Fuel use	Alstrup Skovservice Main office
16.30 – 17.00	Review of procedures for the use of SBP logos and trademarks	Alstrup Skovservice Main office
17.00 – 17.30	Preliminary Closing meeting. Auditor summarizes preliminary conclusions. Program for field visits confirmed.	Alstrup Skovservice Main office

March 28th, 2019

Field visits were conducted on the basis of the inventory of ongoing, planned and completed projects. Auditor was responsible for selecting projects for field visits, taking into account the number of projects, as well as the type of project, size and geographical location.

Activity	**Location**	**Auditor(s)**	**Approximate Time** **March 28, 2019**
Evaluation at forest of origin of primary feedstock, evaluation	Supplier site: Project ID: 1118	CAR	8.30 - 9:00

of relevant mitigation measures.	6920 Videbæk Felling of wind break for ag purposes, felling of row of trees near farm buildings.		
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site: Project ID: 1047 6920 Videbæk Thinning of stands of even-aged exotic conifers: Contorta pine, Sitka and Omorika spruce	CAR	9.00 - 10:00
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site: Project ID: 862 7280 Sdr. Felding Felling of single row of trees along a farm road. No activity on the adjacent §3 area (with moto-cross track)	CAR	10.15 - 10:30
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site: Project ID: 760 6933 Kibæk Removal of a single row of trees adjacent to §3 area	CAR	10:45 - 11:00
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site: Project ID: 988 7330 Brande Final felling of even-aged spruce stand, adjacent to §3 area	CAR	11.15 - 11:45
Evaluation at forest of origin of primary feedstock, evaluation	Supplier site: Project ID: 1083	CAR	11.45 - 12:15

of relevant mitigation measures.	7330 Brande Finale felling of even-aged spruce stand, Thinning of other even-aged stands. Discussions regarding retention of biologically important trees.		
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site: Project ID: 1088 7330 Brande Thinning of small first generation stand.	CAR	12.15 - 12:30
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site: Project ID: 1000 7400 Herning Final felling of a small even-aged stand of Sitka spruce, inspection of proposed final felling and thinning of stands of Sitka spruce and Contorta pine near §3 ponds in abandoned coal pits.	CAR	13.15 - 14:00
Closing meeting Auditor summarizes audit conclusions.	Conclusions and NCR explained.	CAR	14:15 – 14:30

6.2 Description of evaluation activities

Composition of audit team:

Auditor(s), roles	Qualifications
Christian Rahbek, Lead Auditor	M.Sc. (Forestry) from University of Copenhagen. Has passed NEPCon Lead Auditor Training for FSC and PEFC FM and CoC certification. Experience from more than 200 FSC and PEFC CoC and FM audits in Denmark and Europe. Christian is an approved SBP Lead auditor and has partaken in several SBP assessments in Denmark.

6.3 Process for consultation with stakeholders

Stakeholder consultation processes were carried out by both the Biomass Producer (BP) and the Certification Body (CB) in connection with the 2017 main assessment. No further stakeholder process has been found necessary in relation to this annual surveillance audit.

Neither the BP nor the CB has received any comments from stakeholders in the audit period.

The BP wished to add a low-risk sub-scope defined as “Primary feedstock sourced from final fellings in even-aged stands of non-native coniferous trees”. This was evaluated as acceptable by NEPcon and was added following a stakeholder consultation organized by NEPCon to the 4 major stakeholder organizations in Denmark. The comments from two organization (Danish Society of Protection of Nature and WWF) has been accepted and incorporated into the definition of the sub-scope.

7 Results

7.1 Main strengths and weaknesses

Main strengths: The main strengths of the BP lie in the relatively simple operation, with all administrative tasks being carried out by the owner and manager Gert Alstrup and the office assistant Jette Fromberg Nielsen, and the fact that all SBP feedstock is purchased in forest or stand of origin. The owner-manager showed good awareness of best practice in forest machine operation, and all operators have attended a three-day training course in machine operation in near-natural forests, which is a requirement for forest contractors that operate in the FSC and PEFC certified Danish State forests.

The BP has worked closely with the consultant Claus Danefeldt Clemmensen for the industry association Danske Maskinstationer og Entreprenører (also DM&E), whom assisted in creating the Supply Base Report and the documented management system, etc. The BP has an on-going membership with DM&E, and therefore will also have access to support from this source in the future. Furthermore, all interviewed staff had a strong engagement in implementation of SBP system and positive approach.

Weaknesses: The BP does not have in-house staff that are professional foresters, and therefore they are reliant on external staff or partners for conducting field visits and identification and mapping of “key biotopes” prior to starting wood chip production in specified risk stands. The BP has until now relied on only producing SBP-compliant Biomass in stands that belong to low risk sub-scopes. The BP also does not have readily available fuel consumption data for the felling, extraction and chipping of biomass, and therefore for now will instead report default values in accordance with Instruction Document 5B.

For other weaknesses, see the NCR section of this report.

7.2 Rigour of Supply Base Evaluation

*T*he BP has used the SBP endorsed regional risk assessment which has been widely circulated for stakeholder consultation. Based on the “specified risks” in this risk assessment the organization has implemented relevant mitigation measures.

7.3 Collection and Communication of Data

The BP does not have readily available fuel consumption data for the felling, extraction and chipping of biomass, and therefore the BP has opted to use the accepted Default Values from BioGrace II. Auditor has accepted the justification that actual fuel use records were not readily available. Transport distances are recorded for all truckloads of SBP-compliant biomass delivered.

7.4 Competency of involved personnel

The BP has a relatively simple operation, with all administrative tasks being carried out by the owner-manager Gert Alstrup and the office assistant Jette Fromberg Nielsen. Both showed good awareness of their management system, and of the objectives and restrictions in the SBP system.

The owner-manager showed good awareness of best practice in forest machine operation, and all operators have attended a three-day training course in machine operation in near-natural forests, which is a requirement for forest contractors that operate in the FSC and PEFC certified Danish State forests.

The BP has worked closely with the consultant Claus Danefeldt Clemmensen for the industry association Danske Maskinstationer og Entreprenører (also DM&E), who has assisted in creating the Supply Base Report and the documented management system, etc. The BP has an on-going membership with DM&E, and therefore will also have access to support from this source in the future. Furthermore, all interviewed staff had a strong engagement in implementation of SBP system and positive approach.

All involved personal has provided good knowledge in relevant fields, including project management classification to correct sub-scope, and implementation of relevant mitigating measures during the site visits.

The BP has documented qualification requirements for personnel involved in the different aspects of the SBP system, including the qualifications needed for SBE.

According to interviews, review for formal qualifications and the set of procedures and documents that were composed for the SBP system, auditors evaluated the competency of main responsible staff to be sufficient.

7.5 Stakeholder feedback

Neither the BP nor the CB has received any comments from stakeholders in the audit period.

The BP wished to add a low-risk sub-scope defined as “Primary feedstock sourced from final fellings in even-aged stands of non-native coniferous trees”. This was evaluated as acceptable by NEPcon and was added following a stakeholder consultation organized by NEPCon to the 4 major stakeholder organizations in Denmark. The comments from two organization (Danish Society of Protection of Nature and WWF) has been accepted and incorporated into the definition of the sub-scope. The stakeholder consultation ran from April 8th to April 22nd, with no additional responses received by May 14th.

7.6 Preconditions

There are no open preconditions to this certification.

8 Review of Company's Risk Assessments

Describe how the Certification Body assessed risk for the Indicators. Summarise the CB's final risk ratings in Table 1, together with the Company's final risk ratings. Default for each indicator is 'Low', click on the rating to change. Note: this summary should show the risk ratings before AND after the SVP has been performed and after any mitigation measures have been implemented.

Final risk ratings of Indicators as determined in the SBP-endorsed Regional Risk Assessment for Denmark (RRA), by the Biomass Producer (BP) after the SVP and any mitigation measures, and by the Certification Body (CB) after the Biomass Producer's risk mitigation measures.

Table 1. Final risk ratings of Indicators as determined BEFORE the SVP and any mitigation measures.

Indicator	Risk rating (Low or Specified)	
	Producer	CB
1.1.1	Low	Low
1.1.2	Low	Low
1.1.3	Low	Low
1.2.1	Low	Low
1.3.1	Low	Low
1.4.1	Low	Low
1.5.1	Low	Low
1.6.1	Low	Low
2.1.1	Specified	Specified
2.1.2	Specified	Specified
2.1.3	Low	Low
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Specified	Specified
2.2.4	Specified	Specified
2.2.5	Low	Low
2.2.6	Low	Low
2.2.7	Low	Low
2.2.8	Low	Low
2.2.9	Low	Low
2.3.1	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Low	Low
2.4.3	Low	Low
2.5.1	Low	Low
2.5.2	Low	Low
2.6.1	Low	Low
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Low	Low
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low

2.3.2	Low	Low

Table 2. Final risk ratings of Indicators as determined AFTER the SVP and any mitigation measures.

Indicator	Risk rating (Low or Specified)	
	Producer	CB
1.1.1	Low	Low
1.1.2	Low	Low
1.1.3	Low	Low
1.2.1	Low	Low
1.3.1	Low	Low
1.4.1	Low	Low
1.5.1	Low	Low
1.6.1	Low	Low
2.1.1	Low	Low
2.1.2	Low	Low
2.1.3	Low	Low
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Low	Low
2.2.4	Low	Low
2.2.5	Low	Low
2.2.6	Low	Low
2.2.7	Low	Low
2.2.8	Low	Low
2.2.9	Low	Low
2.3.1	Low	Low
2.3.2	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Low	Low
2.4.3	Low	Low
2.5.1	Low	Low
2.5.2	Low	Low
2.6.1	Low	Low
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Low	Low
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low

9 Review of Company's mitigation measures

The BP has defined and implement mitigation measures according to the risks identified in the SBP endorsed Regional Risk Assessment for Denmark, which found 4 Indicators with specified risk and suggests mitigating measures.

The table below shows the specified risk Indicators and the corresponding mitigation methods that the BP is implementing. However, the BP does not implement the suggestion that HCV maps are made publicly available, since this is seen as being invasive of the privacy of the forest owner. The auditor has accepted this conclusion. The reason for this is that it may not be desired by the forest owner. Another reason is that competitors would be able to identify the BP's customers which the BP wish to be confidential. All information is disclosed to the auditor and contain registrations over key biotopes and historical or cultural remnants

The BP has documented and described systematic procedures for implementing the relevant risk mitigating measures according to the sub-scope of the stand of origin. For forests with a green management plan, the relevant maps of HCVs will be used, and for Specified risk stands without the necessary identification and mapping of Key Biotopes, an onsite inspection will be carried out by a trained professional with a minimum of a B.Sc. in Forestry or biology, and maps identifying HVCs including key biotopes will be created.

The BP has until now relied on only producing SBP-compliant Biomass in stands that belong to low risk sub-scopes, and also expects this to be the case for the coming reporting period. The BP sells app. 25% of its total biomass productions as SBP-compliant biomass.

The BP has also implemented documented procedures for protection of biologically valuable dead wood in the forests. The BP has described a short procedure for monitoring the implementation and effectiveness of the planned mitigation measures during annual internal audits.

Indicator	**Mitigating measure**
2.1.1 Forests and other areas with high conservation values in the Supply Base are identified and mapped.	The goal of the mitigation measure is to ensure that any HCV in the area within the Supply Base is identified and sufficiently mapped before sourcing begins of feedstock for biomass production, so that the information about any HCVs can be securely passed on to staff carrying out the felling and chipping operation. The BP creates a map for all wood chip production areas, and all project are assigned a project ID and a checklist is filled in by the owner-manager. This also includes assigning the project to the correct sub-scope. If the area is in a specified risk sub-scope, it is checked if certification or green management plan maps are available, and if this is the case, these are used. This ensures that natural values, including key biotopes can be respected and protected during felling and extraction. If the area is in a specified risk sub-scope, and no maps of key biotopes is available, procedures state that a local expert must be consulted. The online HNV forest map (Map with indication of prevalence of areas of High Nature Value, which available at http://miljoegis.mim.dk/cbkort?profile=miljoegis-plangroendk) is also checked prior to the field survey of HCVs for a calculated indication of the potential for HCVs. If the area is too small to

	carry the cost of a local expert, the biomass will be classed a “other biomass”. If the project area is in a low risk sub-scope, screening is not conducted. Further consideration for all wood chip production areas include consulting maps of legally protected areas, e.g. wetland, marchland, bog, heath or areas of historical, archaeological or any other legal protection status. Procedures are also in place to ensure that any information the owner might have about nesting trees, fox burrows, special local agreements etc. are registered in the project documents.
2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.	For all wood chip production areas the following material is given to the operator(s): - Map of project area - Written instructions from project manager (owner-manager) - Checklist as per 2.1.1 - Any other relevant information This, along with easy access to the project responsible (owner-manager) via mobile phone, ensures that any identified element on the maps requiring protection and any other element requiring protection is respected during felling, extraction and wood chip production processes.
2.2.3 Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).	Risk mitigation measures are the same as for Indicator 2.1.2: For all wood chip production areas the following material is given to the operator(s): - Map of project area - Written instructions from project manager (owner-manager) - Checklist as per 2.1.1 - Any other relevant information This, along with easy access to the project responsible (owner-manager) via mobile phone, ensures that any identified element on the maps requiring protection and any other element requiring protection is respected during felling, extraction and wood chip production processes,
2.2.4: Biodiversity is protected	The goal of the mitigation measure is to ensure that biodiversity is sufficiently protected. This Indicator is seen as being partially covered by Indicators 2.1.1 and 2.1.2, and as such Low risk will be demonstrated or reached through mitigating measures. Required risk mitigation measures are the same as outlined for Indicators 2.1.1 and 2.1.2. Due to the technical requirements that the biomass shall fulfil with regards to humidity and density, it is generally not accepted by Energy Producers that decaying wood is used as input in the chips supplied from Danish Forests. The BP has also established procedures for ensuring that biologically valuable dead and decaying and deadwood on the forest floor is not chipped or removed in connection with production and extraction of biomass. The BP has also established procedures for ensuring that a volume of deadwood is left in the forest after final felling, and for preserving standing dead trees in thinning or afforestation areas.

10 Non-conformities and observations

Identify all non-conformities and observations raised/closed during the evaluation (a tabular format below may be used here). Please use as many copies of the table as needed. For each, give details to include at least the following:

- *applicable requirement(s)*
- *grading of the non-conformity (major or minor) or observation with supporting rationale*
- *timeframe for resolution of the non-conformity*
- *a statement as to whether the non-conformity is likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks.*

NC number 01/19	**NC Grading:** Minor
Standard & Requirement:	SBP Standard 5, Instruction Document 5a, requirement 4.4
Description of Non-conformance and Related Evidence:	
During the audit the transaction claims where reviewed and generally found to contain all of the above information. However, for one single invoice an incorrect PBid had been stated on the invoice and in DTS, namely one pertaining a different reporting period for same endpoint. Since the mistake has only affected a single invoice, and the difference in emissions data is very limited, a minor NCR 01/19 is raised.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 monhts from report finalisation date
Evidence Provided by Company to close NC:	Immediately after the office audit, the BP has contacted the affected customer, and has informed them of the correct PBid. See exhibit 10
Findings for Evaluation of Evidence:	Auditor finds that the corrective action is sufficient, and the NCR is closed on this background.
NC Status:	Closed

NC number *01/18*	**NC Grading: Observation**
Standard & Requirement:	SBP Standard #2, requirement 15.2
Description of Non-conformance and Related Evidence:	
During the audit it was found that the BP has a procedure for protection of dead wood during forest operations. It was seen that valuable dead wood was generally protected in field and that the machine operators were aware of the importance of dead wood for protection of biodiversity. However, the procedure for protection was not in line with the practical implication. See exhibit 2a. The BP should	

review the documented or practical procedure regarding conservation of dead wood so that these two are consistent.	
Timeline for Conformance:	Other
Evidence Provided by Company to close NC:	Pending
Findings for Evaluation of Evidence:	Pending
NC Status:	**Open**

11 Certification decision

Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Pilar Gorría Serrano
Date of decision:	05/Jun/2019
Other comments:	*Click or tap here to enter text.*