

SBP

Sustainable Biomass Program

Regional Risk Assessment for Denmark: SBP Response to Consultation

www.sbp-cert.org



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

Document history

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1 Introduction

Regional Risk Assessments (RRAs) are a key part of SBP's focus on identifying and mitigating risks associated with sustainably sourcing feedstock for biomass pellet and woodchip production. The SBP certification system is designed to provide assurance that feedstock is sourced legally and sustainably.

Feedstock certified at the forest level through FSC[®] or PEFC schemes is considered SBP-compliant. All other feedstock must be evaluated using a risk-based approach if it is to count towards an SBP-compliant claim.

The Biomass Producer, typically a pellet mill or woodchip producer, is responsible for carrying out the risk assessment and putting in place mitigation measures to manage any specified risks such that the risks can be considered to be controlled and hence low risk. It is the role of an independent, third-party Certification Body, approved by SBP, to check that the feedstock evaluation has been correctly undertaken and that any mitigation measures are being effectively implemented.

The purpose of an RRA is to evaluate an entire geographic region and determine the risks associated with sourcing feedstock for biomass pellet or woodchip production from that region. Thus, the need for individual Biomass Producers to conduct risk assessments is avoided and, therefore, consistency between Biomass Producers' risk assessments guaranteed. The SBP RRA procedure also ensures active engagement with a diverse range of stakeholders in the region.

This SBP risk assessment has been prepared on the request of the organisations listed below who have provided financial support for developing the National (Regional) Risk Assessment in accordance with SBP Regional Risk Assessment Procedure v1.0 (now revised to v1.1).

Dansk Energi, Dansk Fjernvarme, Dansk Skovforening, Danske Maskinstationer og Entreprenører (DM&E), De Danske Skovdyrkerforeninger, HedeDanmark, DSHWood, BF Skovflis, Lindenberg Skovselskab, Brahetrolleborg Skov og Landbrug, Natur Biomasse, Skovbygaard, Haderup Skovservice, Skovbyholm Grønt.

The Procedure required that a Working Body (WB) be appointed to conduct an RRA. The Working Body was facilitated by a team of NEPCon national and international experts. The main coordinator of this risk assessment was NEPCon Forest Management lead auditor and project manager, Michael Jakobsen.

Stakeholder consultation is conducted throughout the RRA process and these comments are included by the Working Body in the draft RRA. Stakeholders were then invited to comment for a final time when the draft RRA was placed on the SBP website on 2 May 2017. This report is a summary of those final comments received.

The RRA for Denmark was formally approved by SBP on 19 June 2017.

2 Regional Risk Assessment Procedure

The SBP Regional Risk Assessment (RRA) Procedure (v1.0) specifies the requirements and processes that must be followed to develop and endorse SBP risk assessments of regions or countries.

In January 2017, NEPCo submitted a draft RRA report for Denmark to SBP. SBP then undertook its own public consultation and internal technical review of the draft RRA, the results of which can be found in the following Sections 3 and 4.

3 SBP Public consultation

3.1 Consultation period

On 2 May 2017, the draft Regional Risk Assessment for Denmark was published on the SBP website at: <http://www.sbp-cert.org/documents/consultation-documents/draft-regional-risk-assessments>. Interested parties were invited to provide written comments on the final draft by Monday, 5 June 2017.

3.2 Comments received

Comments on the draft RRA for Denmark were received from one stakeholder.

3.3 Summary and consideration of comments received

3.3.1 Stakeholder comments

Indicator 2.1.1

Stakeholder's view

The stakeholder suggested the use of aerial maps as a 'Means of Verification'.

NEPCon's view

The 'Means of Verification' are guidelines as to the range of tools that may be considered to evaluate and manage the indicator. When a more accurate tool is identified or developed then it would be expected that the indicator would be evaluated by this method.

SBP conclusion

A minor amendment was made to the 'Means of Verification'. However, please see 'NEPCon's view' above.

4 SBP internal review

Following the close of the public consultation period, SBP performed an internal technical review of NEPCo's draft RRA report for Denmark against the procedural requirements.

Comments arising from that review were directed back to NEPCo and NEPCo provided a complete response to each of the issues raised and revised the draft RRA report to include additional clarifications and/or explanations as necessary. SBP is now satisfied that the RRA was conducted in line with the Procedure.

5 Approval and endorsement of Regional Risk Assessment

The RRA for Denmark was formally approved by SBP on 19 June 2017. The SBP-endorsed RRA for Denmark was published alongside this document on 29 June 2017. The SBP-endorsed RRA will remain valid for a period of five (5) years from the approval date, although it may be superseded if a new RRA is completed within the five (5) year period.