

NEPCon Evaluation of DSHwood A/S Compliance with the SBP Framework: Public Summary Report

First Surveillance Audit

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Completed in accordance with the CB Public Summary Report Template Version 1.3

*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

| | |
|---------------------------------|---|
| CB Name and contact: | NEPCon OÜ, Filosoofi 31, 50108 Tartu, Estonia |
| Primary contact for SBP: | Ondrej Tarabus ot@nepcon.org, +420 606 730 382 |
| Current report completion date: | 19/Nov/2018 |
| Report authors: : | Christian Anton Rahbek |
| Name of the Company: | DSHwood A/S |
| Company contact for SBP: | Erik T. Kjær, email: etk@dshwood.com, mobile: +45 2344 9555 |
| Certified Supply Base: | The certified Supply Base covers all of Denmark |
| SBP Certificate Code: | SBP-01-91 |
| Date of certificate issue: | 25/Jan/2018 |
| Date of certificate expiry: | 24/Jan/2023 |

This report relates to the First Surveillance Audit

2 Scope of the evaluation and SBP certificate

The scope of this evaluation is based on SBP standards 1; 2; 4; and 5. During the assessment, the geographical scope of the Supply Base was confirmed to be all of Denmark. The risk evaluation and required mitigation measures in the Supply Base Evaluation are applicable to all of Denmark.

The scope of the SBP certification includes DSHwood's purchase and production of SBP feedstock in all Danish regions, hence the Supply Base is all of Denmark. All feedstock is primary feedstock, and is purchased either as standing volume, as fuel wood in stacks in the forest of origin or as fuel wood or chips from other suppliers under a Supplier Verification Program from 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, and the BP takes full responsibility for all feedstock classification and risk mitigation measures. The organization also buys wood as PEFC or FSC certified but mainly relies on sourcing feedstock as SBP Compliant under its own Supply Base Evaluation. The organization implements a Supplier Verification Program to ensure correct classification of feedstock and that all necessary mitigating measures are observed in all forests and stands of origin of the supplied feedstock.

The BP is supplying the woodchips directly from the forest via truck to the customers, which are combined heat and power plants and district heating plants. The organization has, at the moment, no storage outside of the forests. The BP will contact NEPCon before any storage yard or facility are used by the BP.

Scope description: "Production and trade of woodchips for use in energy production, storage 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 Supplier Verification Program
- 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 evaluation is based on the BP's use of the SBE-endorsed Regional Risk Assessment for Denmark, which is available for download at <https://sbp-cert.org/documents/risk-assessments/denmark>

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

DSHwood A/S is a private limited company lead by Managing Director Rasmus Grønberg Bak. DSHwood is trading logs, lumber and chips from European forests. DSHwood aims to buy the timber directly from the supplier and sell directly to the end user. DSHwood is a dedicated wood trading company and has no ownership in forests, industry or equipment.

DSHwood originates as a trading office as part of the Danish Forest Association – the trade organization of the Danish private forest owners. The trading office was established in 1967 with the purpose of developing export opportunities for Danish wood. In year 2000, the office was reorganized into an independent subsidiary of the Forest Association and renamed DSHwood.

DSHwood A/S holds FSC and PEFC CoC certificates issued by NEPCo and have the PEFC CoC certificate number NC-PEFC/COC-000079 and FSC certificate number NC-COC-011786.

5.2 Description of Company's Supply Base

The BP's Supply Base Report is available for download in Danish and English versions at:

<http://www.dshwood.dk/miljoe/>

The Danish Forest area

According to Danmarks Statistik (2014) is the Danish forest area measured to 620.500 ha, equivalent to 14.4% of the country's total area. Approximately 75% of forest land is owned by private, and the last 25% owned by public organizations.

| Danmark (Distribution by forest size) | Number | % |
|--|---------------|----------|
| <i>Total</i> | 24.142 | 100 |
| <i>0,5 - 19,9 ha</i> | 21.570 | 89,3 |
| <i>20,0 - 49,9 ha</i> | 1.335 | 5,5 |
| <i>50,0 - 99,9 ha</i> | 579 | 2,4 |
| <i>100,0 - 249,9 ha</i> | 365 | 1,5 |
| <i>250,0 - 499,9 ha</i> | 145 | 0,6 |
| <i>Over 500,0 ha</i> | 148 | 0,6 |

The total growing stock in the Danish forest is 130 million m³ equivalent to 209 m³/ha. The largest share of the total growing stock is hardwood (57%), while softwood is 43%. From 2000 until today, the total growing stock in the Danish forests has increased significantly. The reason to the increase can be found in a growing forest area and probably a greater growing stock per hectare.

Net growth in the period 2010-2014 was approximately 2.9 million m³ / year. In the same period was the felling amounted to 4.8 million m³ / year. The total average annual increase has been 7.7 million m³ / year.

Supply Base

The terrestrial environment of Denmark is divided between two EU biogeographical regions by means of a north-south divide through the middle of the Jutland Peninsula: 1) the Atlantic region, covering the western part of Jutland, and 2) the Continental region covering the eastern part of Jutland and Denmark's islands. These regions are used by the Danish Nature Agency under the Ministry of the Environment and Food to the EU Commission to report on the status and management results of Natura 2000 conservation areas.

In the early 1800's, the forest cover in Denmark is estimated to have been as low as 3-4% of the total land area. Deforestation was caused by logging for timber and firewood and for animal grazing areas. Denmark's first forest legislation came into force in 1805. Its main objective and as well as following Danish forest acts, have been to maintain the forest covered area and to protect the existing forest from overexploitation, premature felling and grazing by farm animals. In the mid nineteenth century, intensive forest management became widespread and large afforestation projects were carried out. Today approximately 14% (615,000 hectares) of Denmark's land area is covered by various types of forest.

According to the Danish Nation Forest Inventory, conducted by the Danish Nature Agency, 41% of Denmark's forest area is dominated by deciduous trees, 39% by coniferous tree species, 11% by a mixed coniferous and deciduous tree species, 5% are Christmas tree plantation (located within all the above forest types) and 4% of the area is unstocked, e.g., log loading and landing yards, fire prevention areas etc. Furthermore, 67% of the Danish forest area is covered with even-aged planted stands with 9% being even-aged stands from natural regeneration and 6% of the forest area is uneven-aged natural forest. The latter represent pockets forests that would be closest to what is considered of natural forest stands having retained or regained natural forest characteristics; which can be found in forests both under private and public ownership and they are predominantly located in the Continental region (east Jutland and the isles). The location of these natural forest stands are generally well-known, but some may still be unidentified. Of Denmark's 615,000 hectares of forest, 440,000 hectares are managed as forest reserves (called 'fredskov' in Danish) governed under the Danish Forest Act. The Forest Act permits forest management activities within these areas; however, Article 8 (see Category 1 for more details) requires the managed area shall maintain continuous forest cover, that a maximum of 10% of the forest area can be used for short rotation Christmas trees or greenery production (e.g., cuttings typically from *Abies procera*), and another maximum of 10% of the area can be used for coppicing or for animal forest grazing. The Forest Act also protects streams and wetlands in forests that are not covered by the Nature Protection Act nor under the Ministry of Environment or local authorities. It stipulates that lakes, bogs, heaths, species-rich grasslands, coastal grasslands and swamps located in "fredskov" forest reserve may not be planted or cultivated, drained or in other way changed. It is also important to note the Forest Act does not include many measures relating to forest techniques, e.g. harvesting, planting or thinning (also see Category 1).

There are 79,000 hectares of forests designated as Natura 2000 areas (13% of the Danish forest area) which have some overlap with the 74,900 hectares' forests and other natural areas designated under the EU Habitat Directive, 51,500 hectares under the EU Birds Directive and 13,900 hectares as Ramsar sites. A harvest permit must be obtained from the Danish Nature Agency to conduct any timber harvesting activities within Natura 2000 forests; permits are given with the proviso that the natural condition of the forest will not deteriorate and issuing permits is more an exception than common practice.

In relation to HCV category 3, it is worth noting that although the Forest Act §25 sets provisions for registering 'especially valuable forests' i.e., valuable in terms of their biodiversity and conservation value, and accompanying appropriate conservation management activities for these areas, these areas have not yet been registered by the Danish Nature Agency. Danish forests biodiversity and conservation values have been surveyed by Department of Geosciences and Natural Resource Management at Copenhagen University through a sampling methodological approach. Therefore, not all forest management areas have

been systematically surveyed, particularly small privately forests area. The task of systematically surveying 'especially valuable forests' will be carried out by the Danish Nature Agency in the years 2016 - 2019.

Forest ownership in Denmark are divided by private forests owners, (70%), State and Municipal owners (24%), trust funds or foundations (4%) and unknown owners (2%).

Biodiversity in Danish forests

Due to its historical context, most Danish forests have been exposed to some level of forest management activities, varying from low impact to very intensive forestry. Today the majority of Denmark's forests are semi-natural ecosystems of composing of either native or exotic tree species, interspersed with a few small pockets of (recovered or remnant) natural forest-like stands. Although the forests area has increased over the last two centuries from 3-4% to more than 14%, the nature value of the pre-1800 forest stands have decreased significantly. This is due to intensive forest management practices aiming to manage even-aged, single-tree species stands. Examples of some the detrimental effects of intensive forest management practices include depleting or draining natural hydrology levels, extensive soil cultivation, eutrophication, removal of mature and over-mature trees and deadwood, semi or natural forest stand replacement with exotic species, coppicing and animal grazing.

Since the mid-1990s, forestry practices in Denmark, especially in State and Municipality owned forest, have shifted from traditional, production oriented forest management towards management regimes with a wider set of goals for conservation, biodiversity, recreation and addressing other social needs such as preserving cultural heritage sites.

Danish forest has been surveyed by Department of Geosciences and Natural Resource Management at Copenhagen University by means of a sample methodology and their biodiversity and conservation values have been documented under the Danish National Forest Inventory (NFI) hosted by the Danish Nature Agency.

Denmark ratified the Convention on Biological Diversity in 1994. Today more than 11% of Denmark's terrestrial lands are protected, one third of which are classified as IUCN Categories I and II; of which a large number are protected under the Nature Protection Act and the Natura 2000 EU Directive. These areas have been designated specifically to protect species, landscapes, cultural heritage and/or for scientific research and/or education purposes. For conservation areas, i.e., forest management activities are only allowed in accordance with the specific protection for the individual areas, cover approximately 5% of the country's terrestrial land. Approximately, over 6,300 species in 8 major species groups in Denmark have been assessed according to IUCN Red List criteria, and just over 1,500 or 24% of these have been red-listed. Forests constitute 52% of the habitat affiliations for red-listed species. Furthermore, areas enjoying protection under the Forest Act, Natura 2000 and/or the Nature Protection Act are also mapped and available online via the Danish Nature Agency's digital nature map. Biodiversity data is updated regularly by the Danish Nature Agency and, as mentioned above, it will be completing the registry of "especially valuable forest" over 2016 - 2019. There is one forest area in North Zealand which is listed as UNESCO world heritage due to its historical significance as royal 'Parforce' (a type of hunting system) hunting grounds landscape as, the site demonstrates the application of Baroque landscaping principles to forested areas. DSH (The Biomass producer) has adopted the description above from the draft Region Risk Assessment for Denmark.

DSHwood's wood chip resource: DSHwood is dealing with all kinds of raw wood, wood chips and sawn wood from the Danish forests. Through our own purchasing and sales organization, we strive to buy wood directly from the supplier and sell directly to the end user. DSHwood is a pure trading company and does not own the own industry or forests.

DSH is sourcing our raw material from our supply base which is Denmark. The feedstock is supplied as wood chips produced in the forest of origin. DSH is purchasing the wood chip form Danish contractors. The

contractor is performing the harvesting and chipping operations. DSHwood is supplying the produced wood chips directly from the forest via truck to the customers (heat /power plants/district heating plants)

The distribution of the volumes sold in 2016:

| | % Share |
|----------|----------------|
| Energy | 44,62% |
| Hardwood | 11,95% |
| Softwood | 32,51% |
| Pulpwood | 10,91% |

The wood that is used for chips, is the utilization of low-quality wood which cannot be used for high quality products such as timber, pulpwood.

The resource of Danish woodchip has an origin from forests across the country. Suppliers are a wide section of the Danish forest owners. The chips are typically purchased as follows:

- The forest owner, who is PEFC / FSC certified
- The forest owner who has been responsible for harvesting, driving to road and possibly chipping himself
- Forest contractor who bought the wood standing and have completed reprocessing himself.

The certified wood will come from the forest owner who is PEFC / FSC certified and from the forest contractor who is approved Biomass Producer. Today are 5 % of our purchased chip wood from PEFC/FSC Certified forest.

Forest management practices are based on the Danish specific forestry laws, forestry guidelines, and forest management planning practices. Even-aged forestry is the dominant method. The forest rotation period is 60-100 years, containing mostly tending of the young seedling stands, two thinning's, a final harvesting and regeneration of a mature stand. Planting or natural seeding can be used in regeneration. Recently, un-even-aged forestry has become more popular and applied to the extent possible.

Overview of the proportions of SBP feedstock for chip wood

| | |
|-----------------------------------|------|
| SBP-compliant Primary Feedstock | >99% |
| SBP-compliant Secondary Feedstock | None |
| SBP-compliant Tertiary Feedstock | None |
| SBP non-compliant Feedstock | <1% |

5.3 Detailed description of Supply Base

DSHwood is defining the Supply Base as Denmark: Feedstock is currently sourced in all administrative regions of Denmark. Hence, data is presented for all of Denmark from the National Forest Inventory (2014):

Supply Base

- Total Supply Base area (ha): 620,500 ha
- Tenure by type (ha): 458,205 ha Privately owned/ 150,298 ha Public/ 0 ha Community concession/ 11,997 ha unspecified
- Forest by type (ha): 0 ha Boreal/ 620,500 ha Temperate/ 0 ha Tropical

- d. Forest by management type (ha): 409,530 ha Plantation (plantation and semi-natural planted forest)/ 117,895 ha Managed Natural/ 93,075 ha Natural
- e. Certified forest by scheme (ha): 204,107 ha of FSC or 250,000 ha PEFC-certified forest.
(<http://www.trae.dk/leksikon/certificering-af-skovdrift-systemerne/>) Please note that many forests hold both FSC and PEFC PEFC certificates.

Feedstock

- f. Total volume of Feedstock: 100,000-150,000 m³
- g. Volume of primary feedstock: 100,000-150,000 m³
- h. List percentage of primary feedstock (g), by the following categories. Subdivide by SBP-approved Forest Management Schemes
- 40 % forest holdings certified to an SBP-approved Forest Management Schemes
 - 60 % forest holdings not certified to an SBP-approved Forest Management Schemes
- i. List all species in primary feedstock, including scientific name

| Softwood | | | |
|-------------------------|-------------------------|-------------------------|--|
| <i>Abies alba</i> | <i>Larix</i> spp. | <i>Pinus contorta</i> | <i>Pinus</i> spp. |
| <i>Abies grandis</i> | <i>Picea abies</i> | <i>Pinus nigra</i> | <i>Pseudotsuga menziesii</i> |
| <i>Abies normaniana</i> | <i>Picea glauca</i> | <i>Pinus ponderosa</i> | <i>Thuja plicata</i> |
| <i>Abies procera</i> | <i>Picea sitchensis</i> | <i>Pinus strobus</i> | <i>Tsuga heterophylla</i> (Raf.) Sarg |
| <i>Abies</i> spp. | <i>Picea</i> spp. | <i>Pinus sylvestris</i> | |

| Hardwood | | | |
|----------------------------|----------------------------|----------------------------|----------------------|
| <i>Acer platanoides</i> | <i>Betula pubescens</i> | <i>Populus tremuloides</i> | <i>Quercus rubra</i> |
| <i>Acer pseudoplatanus</i> | <i>Carpinus betulus</i> L. | <i>Populus</i> spp. | <i>Quercus</i> spp. |
| <i>Alnus glutinosa</i> | <i>Fagus sylvatica</i> | <i>Prunus avium</i> | <i>Salix</i> spp. |
| <i>Alnus incana</i> | <i>Fraxinus excelsior</i> | <i>Quercus petraea</i> | <i>Sorbus</i> spp. |
| <i>Betula pendula</i> | <i>Populus tremula</i> | <i>Quercus robur</i> | |

- j. Volume of primary feedstock from primary forest 0%
- k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
- 0 % Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme
 - 0 % Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme
- l. Volume of secondary feedstock: None.

m. Volume of tertiary feedstock: None.

The Qualitative description of the Supply Base can also be found in the Biomass Producer's Supply Base Report which will be available in <http://www.dshwood.dk/miljoe>

5.4 Chain of Custody system

DSHwood A/S holds FSC and PEFC Chain of Custody (CoC) certificates issued by NEPCo and have the PEFC CoC certificate number NC-PEFC/COC-000079 and FSC certificate number NC-COC-011786.

The organization implements a PEFC CoC transfer system based on physical segregation. SBP claims are only made for material that is delivered directly from the forest of origin, 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 forest stock 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 September 12, 13 and 14, 2018, with a closing meeting conducted via telephone conference on September 21, 2018. The first day was an office audit at DSHwood's main office in Fredericia, Denmark. The field audits were carried out on the second and third days. This included visits of totally 14 sites, from which feedstock is sourced and/or where production of wood chips have been or currently are carried out.

The SBP annual surveillance audit was conducted in accordance with the audit plan sent to the BP prior to the audit; however, the closing meeting was conducted via telephone conference on September 21, due to lack of available management representatives on Friday, September 14.

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 observation from the field visits.

In total, 3 days were used for this evaluation: 1 day at the BP's main office site and 2 days for field audits of forests and forest stands. Six sites were visited in Region Sjælland, while eight sites were visited in Regions Syddanmark and Midtjylland. The time used for reporting and administration is not included in these figures.

September 12, 2018

| Time | Activity | Location |
|--------------|--|------------------------|
| 9.00 – 9.30 | Opening Meeting. Introduction of participants. Review of the agenda. | DSHwood Main office |
| 9.30 – 12.00 | The company's presentation of: Short performance of the company: Number of employees, working area, machinery, storage facilities and customers <ul style="list-style-type: none"> • Supply Base Report and Supply Base Evaluation, as well as stakeholder comments • Description of the work area (Supply Base) • Results of Supply Base Evaluation: Specific Risks and Risk-minimizing Actions • Stakeholder comments • if any; peer review and comments • Documented procedures (Management system), including risk mitigation and Supplier Verification Program • Management's annual review of the system • Compliance with EU Timber Regulation • Safety and health procedures • Classification of projects in sub-scopes | DSHwood Main office |

| | | |
|---------------|---|----------------------------|
| | <ul style="list-style-type: none"> • Risk-mitigating measures • Supplier Verification Program • Employee competences • Procedure for handling complaints • Training measures and registration of completed training • Planning field visits • Review and selection of projects that are in preparation, in production and recently completed • Scheduling interviews with employees and collaborators (Can also be completed during field visits) | |
| 12.00 – 12.30 | Break | |
| 12.30 – 13.30 | Review of traceability system <ul style="list-style-type: none"> • Traceability Procedures • Review of documentation: Project registration, card, purchase and sales documentation (interviews with relevant staff) • Review of sales documents: SBP invoice, delivery notes, emission reporting and SBP DTS system. | DSHwood Main office |
| 13:30 – 15:30 | Review of system for collecting and transferring energy and emission data <ul style="list-style-type: none"> • Reporting Period • Transportation Data • Registration of fuel consumption during storage • "SAR" | DSHwood Main office |
| 15:30 – 16:00 | Review of procedures for using SBP logos and trademarks | DSHwood Main office |
| 16.00 – 16.30 | Preliminary Closing meeting. Auditor summarizes preliminary conclusions. Program for field visits confirmed. | DSHwood Main office |

September 13 - 14, 2018

Field visits are conducted on the basis of the inventory of ongoing and completed projects. Auditor is 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. The sample size was determined after taking into account the approximate number of annual wood chip projects/purchases delivered to the customers in the scope of this certification (app. 231) and an approach based on a sample size of $0.8 \times \text{square root of the number of projects}$ yielded a sample of 13 sites, and an additional site was added by auditor to account for ongoing production sites. The sites were 6 in Region Sjælland and 8 in Region Syddanmark and Region Midt.

| September 13, 2018 | | | |
|--------------------|----------|------------|------------|
| Activity | Location | Auditor(s) | Time (ca.) |

| | | | |
|--|----------------|-----|--------------|
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier site | CAR | 9.00-9:45 |
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier site | CAR | 9:45 - 10:00 |
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier site | CAR | 10.30-11:30 |
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier sites | CAR | 11.30-12:30 |
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier site | CAR | 14.00-14:30 |
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier site | CAR | 15.30-16:00 |

| September 14, 2018 | | | |
|--|----------------|------------|-------------|
| Activity | Location | Auditor(s) | Time (ca.) |
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier site | CAR | 8.00-8:45 |
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier site | CAR | 8:45 - 9:00 |
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier site | CAR | 9.30-10:30 |
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier sites | CAR | 11.00-12:00 |

| | | | |
|--|---------------|-----|---------------|
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier site | CAR | 13.00-14:00 |
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier site | CAR | 14.00-14:30 |
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier site | CAR | 15.00-15:30 |
| Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures. | Supplier site | CAR | 16:00 – 16:30 |

September 21, 2018

| Activity | Location | Auditor(s) | Time (ca.) |
|--|-----------|------------|------------|
| Closing meeting. Auditor presents NCRs and audit conclusions. Participation from management representative. | Telephone | CAR | 8.00-8:45 |

6.2 Description of evaluation activities

Composition of audit team:

| Auditor(s), roles | Qualifications |
|---|--|
| Christian Rahbek, Lead Auditor and Local expert | 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 300 FSC and PEFC CoC and FM audits in Denmark and Europe. Christian was approved as SBP Lead auditor in January 2017 and has lead several SBP assessments in Denmark. |

6.3 Process for consultation with stakeholders

Stakeholder consultation processes were carried out by both the Biomass Producer and the Certification Body as a part of the 2017 Main assessment process. No additional stakeholder process has been carried out during this 2018 annual surveillance audit. Neither the BP nor the CB has received any complaints nor stakeholder comments since the last audit.

Description of the 2017 Main assessment stakeholder process:

The BP conducted a stakeholder consultation process that took place in a 30-day period from the 30th of March to 30th of April 2017. Nineteen stakeholders were notified by e-mail. This included associations, national NGOs, Copenhagen University, and umbrella organizations for recreational and labour organizations. The full list of stakeholders is available at the BP and in the exhibit of this report. The BP received no stakeholder responses during the stakeholder process.

The CB conducted a 30-day stakeholder notification process by e-mailing 20 stakeholders, which were largely the same as contacted by the BP, but in addition the Danish Industry Association was contacted. This process took place on the 12th of April to 16th of May 2017. By the time of the main assessment (September 18, 2017), no comments were received by the CB, but most of the key stakeholders had taken part in the Stakeholder meeting in relation to the Regional Risk Assessment for Denmark.

The BP's and CB's stakeholder processes ran with a partial overlap. This was justified in the light of the BP adapting the SBP endorsed Regional Risk Assessment for Denmark and implementing the suggested mitigating from the final draft version of the same document. These had all been subject to discussion at a stakeholder meeting where all relevant stakeholders had been invited. The meeting was held on May 20th, 2016 and was attended by most of the key stakeholders. Some stakeholders provided their input to the process by e-mail in advance. All comments from the previous stakeholder consultations were taken into account by the organization while preparing the final draft of their risk assessment.

7 Results

7.1 Main strengths and weaknesses

Main strengths: The main strengths of the BP lie in the well documented processes. The management system provides a strong backbone for implementing the SBP requirements. The BP has a professional staff of foresters with good training and qualifications for sourcing feedstock. The BP has also taken actions and provided training for contractors to ensure they know requirements relevant for them. The BP showed strong engagement in implementation of the SBP system and a positive approach.

The contractors have at least one operator that have attended a three-day training course in machine operation in nature-like forest. This course is a requirement for forest contractors that operate in the FSC and PEFC certified Danish state forests. Except of this course, all contacts had at least one operator that had participated in DSHwood's training for screening of forest stands.

The BP has worked closely with the consultant Anders Bjørnkjær-Nielsen from B4trees ApS, who has assisted in creating the Supply Base Report and the documented management system, etc. The BP 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 has in-house staff that are professional foresters, but the organization is totally reliant on contractors when sourcing biomass. This means that the contractors or their partners are conducting field visits and identification and mapping of "key biotopes" prior to starting harvests and wood chip production in specified risk stands. Also see NCR section. The BP does not have easily assessable fuel consumption data for harvest, extraction and chipping of biomass, and will therefore instead report default values in accordance with Instruction Document 5B.

7.2 Rigour of Supply Base Evaluation

At the time of the 2018 annual surveillance audit, the Supply Base Evaluation was implemented only for Primary feedstock sourced from Denmark. The BP will carry out the SBE for primary feedstock (forest products) that are originating from Denmark and is sold without SBP-approved Forest Management Scheme claim, SBP-approved Forest Management partial claim or SBP-approved Chain-of-Custody (CoC) system claim. Risk mitigation measures are implemented for material coming from both forest land and from other origin, e.g. landscape maintenance, or residential areas.

The BP has used the Regional Risk Assessment for Denmark, which has been widely circulated for stakeholder consultation. Based on the "specified risks" in this risk assessment the organization has adapted mitigation measures, which were consulted with relevant stakeholders during a meeting held on the 20th of May 2016, and calls/e-mails which took place prior the assessment.

The stakeholder consultation process started with sending a notification email, including the SBR and SBE to numerous stakeholders. The BP keeps records of communication with stakeholders.

The supply base evaluation was a rigorous process, and there has generally been acceptance of the defined sub-scopes and the associated risk conclusions.

All feedstock is primary feedstock, and can be purchased either as standing volume, as fuel wood in stack in the forest of origin or as fuel wood or chips from other suppliers under a Supplier Verification Program from 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 also buys wood as PEFC or FSC certified but will mainly rely on sourcing feedstock as SBP Compliant under its own Supply Base Evaluation. The organization is implementing appropriate mitigating measures in relation of the specified risks identified, and also implements a Supplier Verification Program to ensure correct classification of feedstock and that all necessary mitigating measures in all forests and stands of origin of the supplied feedstock.

7.3 Collection and Communication of Data

Since reliable fuel consumption data is not available from the contractors, the BP has not systematically recorded data on greenhouse gas emissions, and therefore the BP 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.

The BP has opted to use the accepted Default Values from BioGrace II for reporting fuel used in forestry used and felling/chipping. Auditor has accepted the justification that actual fuel use records were not available at the time of the first surveillance audit

7.4 Competency of involved personnel

Both administrative staff showed good awareness of their management system, and of the objectives and restrictions in the SBP system.

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

The BP has worked closely with the consultant Anders Bjørnkjær-Nielsen from B4trees ApS, who has assisted in creating the documented management system, SAR, Static Biomass Profiling Data etc. The BP 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.

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 of 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

Stakeholder consultation processes were carried out by both the Biomass Producer and the Certification Body as a part of the 2017 Main assessment process. No additional stakeholder process has been carried out during

this 2018 annual surveillance audit. Neither the BP nor the CB has received any complaints nor stakeholder comments since the last audit.

7.6 Preconditions

None.

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.

The BP only implements SBE for feedstock from Denmark. The BP has used the SBP endorsed Regional Risk assessment for Denmark and has recognized all the risk ratings from this document. The BP has established and implemented mitigating measures, with the objective of lowering the final risk rating for all indicators to "low".

The CB accepts the BP's choice to use the SBP-endorsed Regional Risk Assessment, which is seen as a credible risk assessment, based on a thorough stakeholder process.

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 |

| 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 |

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|-------|-----|-----|
| 2.2.8 | Low | Low |
| 2.2.9 | Low | Low |
| 2.3.1 | 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 used the suggested mitigation measures in the 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 will implement. However, the BP will not implement the suggestion that HCV maps are made publicly available. Lead auditor finds that it is acceptable to omit this suggestion, as a measure to protect the privacy of the private land owners where the wood chips are produced, that it is not central to the effectiveness of the mitigating measures and also could be costly to implement.

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 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. | <p>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.</p> <p>The BP creates a map for all wood chip production areas, and all projects are assigned a project ID and a checklist is filled in by the owner-operator. 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 is 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 as "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.</p> |

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| | <p>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.</p> |
| <p>2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</p> | <p>For all wood chip production areas the following material is given to the operator(s):</p> <ul style="list-style-type: none"> - Map of project area - Written instructions from project manager (owner-operator) - Checklist as per 2.1.1 - Any other relevant information <p>This, along with easy access to the project responsible (owner-operator) 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,</p> |
| <p>2.2.3 Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).</p> | <p>Risk mitigation measures are the same as for Indicator 2.1.2:</p> <p>For all wood chip production areas the following material is given to the operator(s):</p> <ul style="list-style-type: none"> - Map of project area - Written instructions from project manager (owner-operator) - Checklist as per 2.1.1 - Any other relevant information <p>This, along with easy access to the project responsible (owner-operator) 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,</p> |
| <p>2.2.4: Biodiversity is protected</p> | <p>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.</p> <p>Due to the technical requirements that the biomass shall fulfill 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.</p> |

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.

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| NC number 01/18 | NC Grading: Major |
| Standard & Requirement: | SBP Standard #2 requirement 6.1 |
| Description of Non-conformance and Related Evidence: | |
| <p>The BP has established procedures for ensuring that the place of harvesting is known for all stands where feedstock is harvested. Information about place of harvest is registered for all projects, including project ID, location of stand and land owner. The BP only uses external suppliers and it must be ensured that the place of harvest is known and registered for any and all material sources. The BP is responsible for assessing risk and implementing the risk mitigation measures needed to classify material as SBP-compliant Primary Feedstock. See Exhibit 1 and 2.</p> <p>However, during the audit it was found that two of the screening documents that had been provided by the supplying contractors clearly did not identify the relevant stand of origin. This has the consequence that the evaluation of legal compliance and the implementation of any mitigating measures could not be carried out.</p> | |
| Timeline for Conformance: | 3 months from the report finalisation |
| Evidence Provided by Company to close NC: | Immediately following the audit, the BP has provided updated documentation for the correct origin of locations of harvest for the feedstock. The BP has reaffirmed the importance of reporting correct site of origin to their suppliers and will increase their focus on verifying the site of origin in the Supplier Verification Programme. See exhibit 11. |
| Findings for Evaluation of Evidence: | Auditor has reviewed the BPs statement on addressing the NCR and has conducted a follow-up interview with responsible staff. Auditor finds that the corrective actions are sufficient when compared to the gravity of the NCR. The NCR is closed on this background. |
| NC Status: | Closed |

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| NC number 02/18 | NC Grading: Major |
| Standard & Requirement: | SBP Standard #2 requirement 16.1 |
| Description of Non-conformance and Related Evidence: | |
| <p>The Biomass Producer has adapted the SBP-endorsed Regional Risk Assessment for Denmark, including the suggested risk mitigation measures with the exception of publishing maps of the identified HCV areas (Key biotopes).</p> <p>The Regional Risk Assessment concluded specified risk for the following indicators:</p> <p>2.1.1 Forests and other areas with high conservation values in the Supply Base are identified and mapped.</p> <p>2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</p> <p>2.2.3 Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).</p> <p>2.2.4 Biodiversity is protected (CPET S5b).</p> <p>The key issue addressed in the Regional Risk Assessment (RRA) is based on the stakeholder process that, at the time, was centered on the lack of legal requirement for identification and mapping of Key biotopes (HCV category 3), and the notion that this would pose a potential risk when carrying out forest management activities. The stakeholders accepted an approach where several sub-scopes were defined, with the purpose of only having to apply mitigation measures for sub-scopes where these are relevant.</p> <p>The sub-scopes used by the BP ("source types") are the same as the ones defined in the RRA for Denmark (see point 4.1 in this report or in Exhibit 1).</p> <p>In a Danish context, the indicators mentioned above (i.e. 2.1.1, 2.1.2, 2.2.3 and 2.2.4) are related, and the key issues is the lack of systematic identification, mapping and protection of woodland key biotopes. (All other indicators in standard 1 are rated as low risk).</p> <p>The BP has documented and described procedures both for identifying and mapping "key biotopes" prior to proceeding with harvest operations and wood chipping (see section 16 in Exhibit 1, and Exhibit 5). All feedstock delivered as "sustainable" are checked in accordance with these procedures. The effectiveness of the risk mitigation measures is monitored and evaluated once a year.</p> <p>The different source types are treated different depending on the risk rating done by the BP (and the RRA).</p> <p>When no maps of key biotopes are available, a person with minimum a B.Sc. degree in forestry or biology will screen the site project before the harvesting operation begins. This is in line with suggested measures in the RRA.</p> <p>Some contractors have their own forester employed or has an agreement with one that can perform these screenings.</p> <p>During the audit it was found that two of the screening documents that had been provided by the supplying contractors did not identify the relevant stand of origin (see also NCR 01/18), and in two cases the suppliers screening documents for the wood chip projects did not include a description of the project, nor</p> | |

of any mitigating measures that may have been taken, specifically it did not state that a trained professional had identified and mapped any key biotopes prior to felling and extraction..

The BP has documented procedures for protection of deadwood in the forests and have trained all their contractors. During the field audit, the current level of protection of biologically valuable dead wood during felling and chipping operations was discussed, and generally good awareness was found on the importance of dead wood to the biodiversity of the forests.

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| Timeline for Conformance: | 3 months from the report finalisation |
| Evidence Provided by Company to close NC: | Immediately following the audit, the BP has provided updated screening documentation for the visited locations of harvest for the feedstock. The BP has reaffirmed the importance of carrying out and recording correct mitigating measures for each project. The BP has moved the supplier to a category 2 supplier, which means that the supplier will provide documentation for each project, rather than on request. The BP will then verify the documentation for each project, rather than sample of projects, under the Supplier Verification Programme. See exhibit 12. |
| Findings for Evaluation of Evidence: | Auditor has reviewed the BP's statement on addressing the NCR and has conducted a follow-up interview with responsible staff at the BP and at the contractor. Auditor finds that the corrective actions are sufficient when compared to the gravity of the NCR. The NCR is closed on this background. |
| NC Status: | Closed |

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| NC number 03/18 | NC Grading: Minor |
| Standard & Requirement: | SBP Standard #2 requirement 18.4 |
| Description of Non-conformance and Related Evidence: | |
| <p>The BP's Supply Base Report is based on the SBP-endorsed Regional Risk Assessment for Denmark. This presents mitigation measures for specified risk indicators. The BP has chosen not to implement the suggested measure to make the resulting maps after screening publicly available. These maps include the on-site identification and mapping of key biotopes. Auditor finds this acceptable. See also section 8.</p> <p>The BP has established procedures and is aware that the SBR must be updated at least annually, and the any relevant change, including changes to mitigating measures must be documented. However, during document review it was found that the annual update to the SBR did not include the results of the monitoring of the effectiveness of the implemented mitigating measures. See Exhibits 1 and 2.</p> | |
| Timeline for Conformance: | By the next surveillance audit, but no later than 12 months from report finalisation date |
| Evidence Provided by Company to close NC: | Shortly following the onsite audit, the BP has provided update SBR documents in both English and Danish versions, including the required annual update that now includes the results of monitoring of the |

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| | effectiveness of the implemented mitigating measures. See exhibit 2a and 2b |
| Findings for Evaluation of Evidence: | Auditor has reviewed the updated SBRs including the annual update and finds that they now include the necessary information. The NCR is closed on this background. |
| NC Status: | Closed |

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: | 19/Nov/2018 |
| Other comments: | <i>Click or tap here to enter text.</i> |