Sustainable Biomass Program

NEPCon Evaluation of Skovdyrkerforeningen Øerne a.m.b.a. 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

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1 Overview

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Current report completion date:	01/Apr/2019
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Name of the Company:	Skovdyrkerforeningen Øerne a.m.b.a.
Company contact for SBP:	Rasmus Gregersen, Damsbovej 11, 5492 Vissenbjerg, Denmark, Tel: +45 2555 4201, rgg@skovdyrkerne.dk
Certified Supply Base:	The certified Supply Base covers the following administrative regions of Denmark: Region Syddanmark, Region Sjælland and Region Hovedstaden
SBP Certificate Code:	SBP-01-75
Date of certificate issue:	17/May/2017
Date of certificate expiry:	16/May/2022

This report relates to the Second Surveillance Audit

2 Scope of the evaluation and SBP certificate

Production of wood chips for use in energy production, transport, storage and sale at different energy producers in Denmark. The scope includes Supply Base Evaluation for primary feedstock from Denmark and the use of remote storage sites.

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.

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

Skovdyrkerforeningen Øerne a.m.b.a. is a forest owner association owned by the members in Funen, Zealand and Bornholm in Denmark. The association was established to provide advisory services in forest management, to assist in managing contractors and to provide a sales channel for the forest owner's forest products, including timber, wood chips, Christmas trees and greenery.

Skovdyrkerforeningen Øerne a.m.b.a. is itself a part of the umbrella organization "De Danske Skovdyrkerforeninger" and is also covered by the NEPCon issued PEFC CoC certificate held by this organization (NC-PEFC/COC-000070). Skovdyrkerforeningen Øerne a.m.b.a. also offers its members the opportunity of participating in FSC / PEFC Forest management group certification in collaboration with "De Danske Skovdyrkerforeninger".

In relation to the SBP certification, the main activity of the BP is the production and sales of wood chips. The wood chips are produced in the forests of origin in the Danish regions Syddanmark, Sjælland and Hovedstaden. 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 working and sourcing within the defined Supply Base. In all cases the stand of origin is known. The organization can purchase wood as FSC or PEFC certified but will mainly rely on sourcing feedstock as SBP Compliant from its own Supply Base Evaluation. The organization is implementing appropriate mitigating measures in relation to the specified risks identified and has described a Supplier Verification Program to ensure that the necessary mitigating measures are implemented in all forests supplying feedstock. The organization does not chip secondary or tertiary feedstock, and thus this in not included in the scope of the certification.

The organization is producing and purchasing wood chips in the forest of origin and supplies the material via truck to the customers, which are combined heat and power plants or district heating plants. Occasionally outdoor storage facilities are used, see section 16.2 for an overview of storage facilities.

5.2 Description of Company's Supply Base

Denmark - forest resources

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 the Continental region, 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 wells 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 broadleaved trees, 39% by coniferous tree species, 11% by a mixed coniferous and broadleaved 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 is 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 or 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 is 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 has 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.

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.

5.3 Detailed description of Supply Base

Skovdyrkerne Øerne is defining the Supply Base as the following regions of Denmark: Syddanmark, Sjælland and Hovedstaden. Data is collected from the National Forest Inventory (2014)

a. Total Supply Base area (ha): 293.159 ha forest

b. Tenure by type (ha): 199.000 ha privately owned, 18.900 ha owned by foundations, 67.700 ha public owned, 7.559 ha other

c. Forest by type (ha): 0 ha boreal, 293.159 ha temperate, 0 ha tropical

d. Forest by management type (ha): 187.800 ha plantation/planted forest, 71.800 ha natural forest, 33.400 ha unknown.

e. Certified forest by scheme (ha): ca. 50.000 ha FSC-certified forest and ca. 60.000 ha PEFC forest. Note that many forests hold both FSC and PEFC certificates. The numbers are based on an estimate for the regions Syddanmark, Sjælland and Hovedstaden.

The Qualitative description of the Supply Base can also be found in the Biomass Producer's Supply Base Report, which is available online at the BP's website: http://www.skovdyrkerne.dk/oer/oparbejdning-og-salg-af-dit-flis/

5.4 Chain of Custody system

Skovdyrkerforeningen Øerne a.m.b.a. is a part of the umbrella organization ”De Danske Skovdyrkerforeninger” and is covered by the NEPCon issued PEFC CoC certificate held by this organization (NC-PEFC/COC-000070). Skovdyrkerforeningen Øerne a.m.b.a. offers its members the opportunity of participating in FSC / PEFC Forest management group certification in collaboration with ”De Danske Skovdyrkerforeninger”.

The organization implements both PEFC CoC systems based on physical segregation, and a volume credit system. However, only physical segregation will be used for SBP. SBP claims can therefore only be made for material that is delivered directly from the wood chipper in the forest, or alternatively, when stacks of wood chips only consist of material meeting certification requirement. The BP is aware that under the existing system, no controlled or uncontrolled material can be physically mixed with the SBP-compliant biomass.

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

6 Evaluation process

6.1 Timing of evaluation activities

The SBP audit was carried out on the 21st, 22nd and 24th of January 2019 (office audit and field visits, respectively), and it included visit of Skovdyrkerforeningen Øerne A.m.b.a. main office in Vissenbjerg, Denmark and field visits of, in total, 18 sites (16 forest sites and 2 storage site) at the islands Bornholm and Funen. The field visit included sites from which feedstock had been, currently are being, or was planned to be sourced from. These sites have been, are, or will be used for production of wood chips. The number of sites that was selected for field audit was based on the 0.8 times the square root of the number of projects since last audit. The number of total projects for 2018 corresponded to approximately 385. This results in a sample of $\sqrt{(385)} \times 0.8 \approx 16$ projects.

A total of 4,0 days was used for this evaluation: 1 day of preparations, 1 day at the BP's main office, and 2 days for audit of feedstock origin and risk mitigation measures in the forest stands – a total of 16 production sites in administrative Regions Syddanmark, Sjælland and Hovedstaden. Time used for reporting and administration is not included in these figures.

The SBP 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 planned, ongoing and recent wood chip production projects. The field visits were conducted during two days by one auditor (and an auditor in training), and started in the field and ended at the main office in Vissenbjerg.

After field visits at the wood chip production sites, the Lead Auditor (CAR) held a closing meeting at the main office in late the afternoon of the 24th of January 2019. Here, the Lead Auditor presented a summary of the findings to the forester in charge of management of wood chip operations, the CEO and the management system consultant.

Activity	Location	Auditor (s)	Date / Time
Opening Meeting	Main office	CAR + SJU	January 21, 2019 8:30 to 9:00
Review of the Management System and interviews with the certification responsible: • Management system or procedures with special focus on scope changes • Status of internal audits of the management system and SVP (if used) • Training of staff	Main office	CAR + SJU	9:00 to 12:00

• Compliance with the EU Timber Regulation • Safety and health procedures • Classification of projects in sub-scopes • Risk minimization initiatives in the company • Supply Base Report, Annual update • SAR and Static Biomass Profile Data • Interviews with employees (can also be performed during field visits) • Follow-stakeholder approach			
Break	Main office	CAR + SJU	12:00 to 12:30
Continuing review of Management System referred to above.	Main office	CAR + SJU	12:30 to 14:00
Review of SBP CoC system and Credit System, DTS, and the use of logos	Main office	CAR + SJU	14:00 to 15:00
Planning of field visits and preliminary summary	Main office	CAR + SJU	15:00 to 15:30
Field Visit to forest projects and storages after agreement with company	Field	CAR + SJU	21 to 24 Jan 2019
Closing Meeting: Auditor pressure provides results of the evaluation	Main office	CAR + SJU	24 January 2019

6.2 Description of evaluation activities

Composition of audit team:

Auditor(s), roles	Qualifications
Christian Rahbek (CAR), 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 200 FSC and PEFC CoC audits in Denmark and Europe. Christian is an approved SBP Lead auditor and has partaken in several SBP assessments and audits in Denmark, Latvia and Canada.
Steffen Just (SJU), Auditor in training	Master's degree in Forest and Nature Management from the University of Copenhagen. Lead Auditor within the FSC and PEFC certification schemes, specifically with Chain of Custody auditing. Previous experience from the Danish government where his work focused on forest management, afforestation projects, environmental legislation, hunting and wildlife management.

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 main assessment. Neither the BP nor the CB has received any comments from stakeholders before this year's evaluation.

Prior to the main assessment, the BP conducted a stakeholder consultation process that took place in a 30-day period from December 2nd, 2016 to January 5th, 2017. 15 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 BP and in the exhibit of this report. The BP received no stakeholder responses as a result of the stakeholder consultation.

CB conducted a 30-day stakeholder notification process by e-mail message the same stakeholders, and additionally to the Danish Industry Association, on December 14th, 2016. No comments were received by Biomass Producer nor CB by January 15th, 2017, but most of the key stakeholders had taken part in the Stakeholder meeting in relation to the Regional Risk Assessment for Denmark. This RRA stakeholder Process in ongoing and all relevant stakeholders are included in the work with the RRA for Denmark.

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

During, and after, the audit 2019, the Certification Body reached out to a list of specific stakeholders in relation to topics discussed during field visits. See Appendix G.

7 Results

7.1 Main strengths and weaknesses

Main strengths: All processes have been well documented; project management system provides a strong backbone for material balances and is very functional and ensures that all relevant information can be reported. The BP has a professional staff of foresters with good training and qualification for sourcing feedstock, including determining the need for mitigation measures and implementing these when needed. The BP has long-term relations with most of the forest or land owners, where the wood chips are produced. They also have a strong engagement and contact with local stakeholders. All interviewed staff had a strong engagement in implementation of SBP system and positive approach.

Weaknesses: See NCR section.

7.2 Rigour of Supply Base Evaluation

The Supply Base Evaluation has been implemented for primary feedstock sourced from 3 regions of Denmark. 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 which has been widely circulated for stakeholder consultation by NEPCon. Based on the “specified risks” in this risk assessment the organization has suggested some mitigation measures which were consulted with relevant stakeholders during a meeting held on May 20th, 2016, organized by NEPCon and calls/emails which took place prior the assessment.

The stakeholder consultation process started with sending email to numerous stakeholders and during audit 2019, the CB also interviewed certain relevant stakeholders by phone. The BP keeps records of all their 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.

The BP sources SBP feedstock through two supply chains: 1) The BP buys the material as standing stock or in stacks in the forest of origin, where the BP’s own staff classifies the source’s sub-scope and has implemented any required risk mitigating measures according to the risk level of the sub-scope, or 2) The BP buys feedstock from supplier under their Supplier Verification Program. The second supply chain is forest contractors that have planned and carried out the felling, extraction and chipping of the feedstock. The feedstock is assigned to a sub-scope by the BP and the supplier, and if the feedstock originates from a stand belonging to a specified risk sub-scope, the feedstock will either be subject to implementation of all applicable risk mitigation measures (the BP is doing the onsite verification of the forest stand prior harvesting), or be regarded as “other biomass” and sold on without any claim of SBP compliance. The external suppliers are subject to the BP’s Supplier Verification Program, where traceability, classification of sub-scope and implementation of risk mitigation when required is monitored.

7.3 Collection and Communication of Data

The BP has opted to use the accepted Default Values from BioGrace II for reporting fuel used in forestry used and felling/chipping. Further information about fuel consumption for transport was also collected from trucking companies. The methodologies for collecting and reporting data were complete and accurate at the end of the annual audit.

7.4 Competency of involved personnel

A number of staff members are involved in the SBP system management, including the Managing Director, Wood Chip Production Manager, Foresters and administrative staff. Interviews carried out with the current staff demonstrated good awareness of their responsibilities within SBP system.

The main responsibility for the SBP certification, lies with the head forester for wood chip production Rasmus Gregersen (M.Sc. Forestry), supported by Ms. Katrine Bang Hauberg (M.Sc. Forestry) from a sister organization under Danish Forest Growers Association, and between them, they have significant experience in forest management within the supply base.
All involved personal has provided good knowledge in relevant fields, including project management and recognition of HCV aspects, 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

During the BP's stakeholder consultation, no comments were received, and the consultation only proved that the stakeholders already expressed their opinion to the Certification Body (CB) in charge of the process of the SBP-endorsed Regional Risk Assessment for Denmark.

The CB, however, received several comments from stakeholders during the stakeholder consultation of the Regional Risk Assessment. All comments were considered in the Regional Risk Assessment for Denmark.

The phone-interviews with relevant stakeholders, carried out during, and after, this year's audit, showed no negative feedback or comments to the SBP system.

7.6 Preconditions

No preconditions.

8 Review of Company's Risk Assessments

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	Low
2.1.2	Specified	Low
2.1.3	Low	Low
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Specified	Low
2.2.4	Specified	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

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	Specified	Low
2.1.2	Specified	Low
2.1.3	Low	Low
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Specified	Low
2.2.4	Specified	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

Skovdyrkerne Øerne has used the 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 Skovdyrkerne Øerne will implement. However, the BP will not implement the suggestion that HCV maps are made publicly available, which is seen by the CB as acceptable after the stakeholder process.

Skovdyrkerne Øerne has documented and described procedures both for proceeding with extraordinary caution in potential areas of specified risk, and for monitoring the implementation and effectiveness of the planned mitigation measures. Skovdyrkerne Øerne has implemented documented procedures for protection of biologically valuable dead wood in the forests.

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 of feedstock for biomass production begins, so that the information about any HCV can be securely passed on to staff carrying out the felling and chipping operation. For non-FSC or PEFC certified forests and forests without a green management plan, identification and mapping of HCVs must be carried out. It is suggested that the HNV forest online map (available at http://miljoegis.mim.dk/cbkort?profile=miljoegis-plangroendk) is consulted for a calculated indication of the potential for HCVs prior to a field survey of HCVs, and that the catalog of key biotopes or similar is used. The effectiveness of the application of the catalog of key biotopes is reliant upon sufficient skill and training of the personnel carrying out the survey. For a skilled professional the identification and mapping of HCVs would be possible with an acceptable level of effort compared to the size of the area where sourcing of feedstock will take place. It is also suggested that, as a safeguard mechanism, the resulting maps are made publicly available. This would allow for expert and stakeholder review and comments.
2.1.2	Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.	For forests with a green management plan, HCVs have been identified and mapped, but since there is no requirement for independent evaluation of adherence to limitations in the green management plan, the plan including the maps, must be consulted and planned activities must be compared to limitations in the management plan. For forests without at least a green management plan, HCVs in the area where feedstock for biomass production is sourced must first be identified and mapped (see indicator 2.1.1), and sufficient maps and instruction be prepared for personnel in charge for the felling or other activities, so that it is ensured that HCV will not be threatened for FM activities. It is also suggested that, as a safeguard mechanism, the resulting maps are made publicly available. This would allow for expert and stakeholder review and comments.
2.2.3	Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).	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 of feedstock for biomass production begins, so that the information about any HCV can be securely passed on to staff carrying out the felling and chipping operation. For non-FSC or PEFC certified forests and forests without a green management plan, identification and mapping of HCVs must be carried out. It is suggested that the HNV forest online map (available at http://miljoegis.mim.dk/cbkort?profile=miljoegis-plangroendk) is consulted for a calculated indication of the potential for HCVs prior to a field survey of HCVs, and that the catalog of key biotopes or similar is used. The effectiveness of the application of the catalog of key biotopes is reliant upon sufficient skill and training of the personnel carrying out the survey. For a skilled professional the identification and mapping of HCVs would be possible with an acceptable level of effort compared to the size of the area where sourcing of feedstock will take place. It is also suggested that, as a safeguard mechanism, the resulting maps are made publicly available. This would allow for expert and stakeholder review and comments.
2.2.4	Biodiversity is protected (CPET S5b).	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 of feedstock for biomass production begins, so that the information about any HCV can be securely passed on to staff carrying out the felling and chipping operation. For non-FSC or PEFC certified forests and forests without a green management plan, identification and mapping of HCVs must be carried out. It is suggested that the HNV forest online map (available at http://miljoegis.mim.dk/cbkort?profile=miljoegis-plangroendk) is consulted for a calculated indication of the potential for HCVs prior to a field survey of HCVs, and that the catalog of key biotopes or similar is used. The effectiveness of the application of the catalog of key biotopes is reliant upon sufficient skill and training of the personnel carrying out the survey. For a skilled professional the identification and mapping of HCVs would be possible with an acceptable level of effort compared to the size of the area where sourcing of feedstock will take place. It is also suggested that, as a safeguard mechanism, the resulting maps are made publicly available. This would allow for expert and stakeholder review and comments.

10 Non-conformities and observations

NC number 01/19	**NC Grading:** Major
Standard & Requirement:	SBP Standard #1 requirement 1.3.1
Description of Non-conformance and Related Evidence:	
During field visits it was observed at several sites, that the BP had cut down trees within the 2m zone from protected watercourses, without first getting a permission, which is otherwise not allowed according to the water course regulations. Interview with the relevant staff showed, that they were not aware of this regulation. At one site, it was observed that the outer forest edge had been completely cut down which is not allowed according to the Danish Forest Act. However, this was only observed at one site and interview with the relevant staff showed, that they were aware of the law but had not had enough focus on the issue.	
Timeline for Conformance:	3 months from the report finalisation
Evidence Provided by Company to close NC:	The BP has sent info and will talk to each forester individually, regarding the issues, to all their foresters, so mistakes like this will be avoided in the future. See Exh 10. Follow up calls for the info sent to foresters.
Findings for Evaluation of Evidence:	Auditor has concluded that the info given to the foresters was well understood and will sufficiently secure that the issues are avoided in the future, given that the trees are very likely to naturally regenerate within a short timeframe.
NC Status:	Closed

NC number 02/19	**NC Grading:** Observation
Standard & Requirement:	SBP Standard #1 requirement 2.2.4.
Description of Non-conformance and Related Evidence:	
During field visit to a storage site, auditors observed a small proportion of potential “biodiversity-trees” that were old and hollow, in a stack of wood meant for chipping. Because of the small scale and the fact that these trees could potentially be originating from non-forest areas, this is only raised as an observation. However, the BP should always be sure to protect the biodiversity trees in forest.	
Timeline for Conformance:	Other
Evidence Provided by Company to close NC:	N/A

Findings for Evaluation of Evidence:	N/A
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:	01/Apr/2019
Other comments:	*Click or tap here to enter text.*