

# NEPCon Evaluation of Skovdyrkerforeningen Vestjylland a.m.b.a. Compliance with the SBP Framework: Public Summary Report

Third Surveillance Audit

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## 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  
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### *Document history*

*Version 1.0: published 26 March 2015*

*Version 1.1: published 30 January 2018*

*Version 1.2: published 4 April 2018*

*Version 1.3: published 10 May 2018*

*Version 1.4: published 16 August 2018*

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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:	08/Oct/2019
Report authors: :	Steffen Just and Christian Rahbek
Name of the Company:	Skovdyrkerforeningen Vestjylland a.m.b.a.
Company contact for SBP:	CEO Michael Gehlert, mobile +45 20485333, email: mgh@skovdyrkerne.dk
Certified Supply Base:	The certified Supply Base covers the following regions of Denmark: Nordjylland, Midtjylland and Syddanmark
SBP Certificate Code:	SBP-01-54
Date of certificate issue:	15/Dec/2016
Date of certificate expiry:	14/Dec/2021

This report relates to the Third Surveillance Audit

## 2 Scope of the evaluation and SBP certificate

Production of wood chips, for use in energy production and sale at different energy producers in Denmark. The scope of the certificate includes Supply Base Evaluation.

### 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 described 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 implemented
- 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 utilises the SBP-endorsed Regional Risk Assessment for Denmark. This document is available for download at <https://sbp-cert.org/documents/standards-documents/risk-assessments/denmark/>

## 5 Description of Company, Supply Base and Forest Management

### 5.1 Description of Company

Skovdyrkerforeningen Vestjylland a.m.b.a. is a cooperative owned by forest owners in western Jutland, Denmark, 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 Vestjylland a.m.b.a. is itself a part of the umbrella organization "De Danske Skovdyrkerforeninger" and is also covered by the NEPCo-issued PEFC CoC certificate held by this organization (NC-PEFC/COC-000070). Skovdyrkerforeningen Vestjylland 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, either in the stands by self-propelled wood chippers or from a log pile by a truck mounted chipper. All wood chips are produced from Primary Feedstock, and the organization does not foresee chipping secondary or tertiary feedstock, and thus this is not included in the scope of the certification.

The organization purchases all of its feedstock for the wood chips in the Danish regions Midtjylland, Syddanmark, and Nordjylland, with the vast majority coming from Midtjylland and Syddanmark. 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 within the Supply Base. In all cases the stand of origin is known. The organization can source 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 of the specified risks identified, and has described a supplier verification system to ensure that the necessary mitigating measures are implemented in all forests supplying feedstock.

The organization is supplying the wood chips produced directly from the forest via truck to the customers, which are combined heat and power plants and district heating plants.



## 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 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 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 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 have 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.

The Biomass producer has adopted the description above from the draft Region Risk Assessment for Denmark

### 5.3 Detailed description of Supply Base

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

- a. Total Supply Base area (ha): 474.088 ha
- b. Tenure by type (ha): 351.763 ha privately owned, 122.286 ha public owned, 0 ha community concession (7.559 other)
- c. Forest by type (ha): 0 ha boreal, 474.088 ha temperate, 0 ha tropical
- d. Forest by management type (ha): 375.437 ha semi-natural forest, 98.652 ha natural forest
- e. Certified forest by scheme (ha): ca. 162.000 ha FSC-certified forest and ca. 196.000 ha PEFC forest. Note that many forests hold both FSC and PEFC certificates. The numbers are based on an estimate for the regions 'Middjylland', 'Syddanmark' and 'Nordjylland'.

The Qualitative description of the Supply Base can be found in the Biomass Producer's Public Summary Report which can be found here:

[http://www.skovdyrkerne.dk/fileadmin/user\\_upload/Vest/dokumenter/Flis/Annual\\_Update\\_3\\_periode\\_UK\\_og\\_DK.pdf](http://www.skovdyrkerne.dk/fileadmin/user_upload/Vest/dokumenter/Flis/Annual_Update_3_periode_UK_og_DK.pdf)

## 5.4 Chain of Custody system

Skovdyrkerforeningen Vestjylland 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 Vestjylland 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".

The PEFC CoC system is based on physical segregation and volume credit systems, and therefore PEFC or SBP claims can be made for both material that is delivered directly from the wood chipper in the forest under physical segregation, or alternatively, when the flow of wood chips is controlled in the volume credit system and all material entering the product group meets PEFC certification requirements, that output claims are calculated correctly. The PEFC Volume Credit system is based on a product group without a physical site, which is acceptable for traders of PEFC certified material that do not take physical possession of the material (no storage site is used). Procedures are implemented so it is ensured that no uncontrolled feedstock can be mixed with SBP-compliant or SBP-controlled feedstock,

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 annual surveillance audit was carried out on August 15th, 19th and 20th, 2019 and included visits at the Skovdyrkerne Vestjylland a.m.b.a. Main office in Holstebro, Denmark and at a number of sites where wood chips have been or currently are being sourced and produced.

A total of 4 days were used for this evaluation – 1 day of preparations, 1 day at the BP site and 2 days for audits at the forests stands of origin and production of wood chips.

The SBP surveillance audit was conducted in accordance with the plan below; please note that the field visits were conducted after consulting the Biomass Producers records of ongoing and recent wood chip production engagements. The field visits were started and ended in the field. After the field visits a closing meeting was conducted and a summary of the findings from the field visits was provided to the CEO and forester in charge of management of wood chip operations.

Activity	Location	Auditor	Date/time
Opening meeting*	Main office	CAR, SJU	15. August 2019 9:00 – 9:30
The BP presentation of: - Brief presentation of the company: Number of employees, business partners, supply base, equipment, storages and customers - Supply Base Report, annual update - Documented procedures (Management system), including Mitigating Measures and Supplier Verification Program - management annual review of the system - EUTR Compliance - Health and safety procedures - Use of sub-scopes - Mitigating Measures - SVP - Employee Competences - Complaints handling Procedures - Training records  Planning of field visits: - Review and sampling of wood chip projects in planning, production and finished stages.	Main office	CAR, SJU	9:30 – 12:00

Planning of interviews with staff and business partners (Can also be carried out during field visits)			
Review of Chain of Custody system: - CoC Documented Procedures -Review of documentation: Project records, maps, purchase and sales documents (interviews with relevant staff) - Review of SBP invoices, transport documents, reporting of emission data and SBP DTS system	Main office	CAR, SJU	12:30 – 14:00
Review of system for collection and communication of Energy and Emission data: - Reporting period - Transport data - Records of fuel consumption during production and storage - SAR	Main office	CAR, SJU	14:00 – 15:30
Review of SBP CoC system and credit system, DTS, and of SBP logo usage.	Main office	CAR, SJU	14:00 – 16:00
Planning of field visits and preliminary summary of audit results.	Main office	CAR, SJU	16:00 – 16:30

Field visits:

Field visits were conducted on the basis of the records of ongoing, planned and completed projects. Auditor was responsible for selecting projects for field visits from a list of projects provided by the BP prior to the on-site audit, taking into account size, risks, geographical location of the projects and a random selection element. The sample size was determined based on 0.8 x square root of the number of projects; total of 276 projects; sample size 14. Opportunities for conducting interviews with contractors and suppliers were also considered in the sampling of the wood chip projects, these project sites are indicated below.

Field Visit to forest projects after agreement with company	Field	CAR + SJU	19 to 20 Aug 2019
Closing Meeting:  Auditor pressure provides results of the evaluation	Main office	CAR	20 Aug 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), Audit team member	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 and the Certification Body as a part of the 2016 main assessment.

There has been no active stakeholder outreach by either BP nor NEPCon as a part of this annual surveillance audit, and there has not been any comments or concerns directed from stakeholders to either BP or NEPCon in relation to this 2018 annual surveillance audit.

Summary of the 2016 main assessment stakeholder process:

BP conducted a stakeholder consultation process that took place in a 30-day period from July 1th 2016 to July 31th 2016. 14 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 on July 14th 2016. No comments were received, 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 draft 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. SBP has been informed about the two stakeholder processes running partially concurrently and has accepted this.



## 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. Strong engagement in implementation of SBP system and positive approach.

**Weaknesses:** See the NCR section of this report

### 7.2 Rigour of Supply Base Evaluation

At the moment the Supply Base Evaluation was implemented only for primary feedstock sourced from 3 regions of Denmark. Skovdyrkerforeningen Vestjylland a.m.b.a. carries out the SBE for primary feedstock (forest products) that are originating from Denmark and is purchased without SBP-approved Forest Management Scheme claim, SBP-approved Forest Management partial claim, 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 SBP-endorsed 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 supply base evaluation was a rigorous process, and there has generally been acceptance of the defined sub-scopes and the associated risk conclusions.

### 7.3 Collection and Communication of Data

Prior to the 2016 main assessment the organization has not systematically recorded data on greenhouse gas emissions, but had conducted trials for gaining accurate knowledge about the fuel use of the various equipment used. Further information about fuel consumption for transport was also collected from trucking companies. The methodologies for collecting and reporting data were still seen as complete and accurate at the end of the annual surveillance audit.

## 7.4 Competency of involved personnel

During the annual surveillance audit it was evaluated that staff members involved in the SBP system management and implementation, including the Managing Director, Forestry Specialist, Foresters and administrative staff. Interviewed staff had good awareness of their responsibilities within SBP system.

The SBE was mainly implemented by the Managing Director and the Forestry Specialist, both holding M.Sc. degrees in forestry, and between them, they have more than 30 years of experience in forest management within the supply base.

All involved personnel showed good knowledge in relevant fields, including project management and recognition of HCVF 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

Stakeholder consultation processes were carried out by both the Biomass Producer and the Certification Body as a part of the 2016 main assessment. There has been no active stakeholder outreach by either BP nor NEPCon as a part of this annual surveillance audit, and there has not been any comments or concerns directed from stakeholders to either BP or NEPCon since last annual audit.

See also the summary of the 2016 stakeholder process in section 6.3 above.

## 7.6 Preconditions

There are no open preconditions to this certification.

## 8 Review of Company’s Risk Assessments

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

The BP only implements SBE for feedstock from Denmark, uses 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”.

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

Indicator	Risk rating (Low or Specified)		Indicator	Risk rating (Low or Specified)	
	Producer	CB		Producer	CB
1.1.1	Low	Low	2.3.3	Low	Low
1.1.2	Low	Low	2.4.1	Low	Low
1.1.3	Low	Low	2.4.2	Low	Low
1.2.1	Low	Low	2.4.3	Low	Low
1.3.1	Low	Low	2.5.1	Low	Low
1.4.1	Low	Low	2.5.2	Low	Low
1.5.1	Low	Low	2.6.1	Low	Low
1.6.1	Low	Low	2.7.1	Low	Low
2.1.1	Specified	Specified	2.7.2	Low	Low
2.1.2	Specified	Specified	2.7.3	Low	Low
2.1.3	Low	Low	2.7.4	Low	Low
2.2.1	Low	Low	2.7.5	Low	Low
2.2.2	Low	Low	2.8.1	Low	Low
2.2.3	Specified	Specified	2.9.1	Low	Low
2.2.4	Specified	Specified	2.9.2	Low	Low
2.2.5	Low	Low	2.10.1	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

**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 implemented the conclusions of the SBP endorsed version of the Regional Risk Assessment for Denmark. Skovdyrkerne Vestjylland used the mitigation measures in the first draft of the Regional Risk Assessment for Denmark, which found 4 Indicators with specified risk and suggested mitigating measures. The BP has implemented mitigating measures to ensure that biologically important sites are protected, but has opted not to make the maps to key biotopes available for download as suggested, in order to protect the privacy of the private landowners where the feedstock is sourced.

The table below shows the specified risk Indicators and the corresponding mitigation methods that Skovdyrkerne Vestjylland are implementing.

Skovdyrkerne Vestjylland has documented procedures for proceeding with caution in potential areas of specified risk, and for monitoring the implementation and effectiveness of the planned mitigation measures.

<p>2.1.1</p>	<p>Forests and other areas with high conservation values in the Supply Base are identified and mapped.</p>	<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 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 <a href="http://miljoegis.mim.dk/cbkort?profile=miljoegis-plangroendk">http://miljoegis.mim.dk/cbkort?profile=miljoegis-plangroendk</a>) 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.</p>
<p>2.1.2</p>	<p>Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</p>	<p>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.</p>
<p>2.2.3</p>	<p>Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).</p>	<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 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 <a href="http://miljoegis.mim.dk/cbkort?profile=miljoegis-plangroendk">http://miljoegis.mim.dk/cbkort?profile=miljoegis-plangroendk</a>) 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.</p>
<p>2.2.4</p>	<p>Biodiversity is protected (CPET S5b).</p>	<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 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 <a href="http://miljoegis.mim.dk/cbkort?profile=miljoegis-plangroendk">http://miljoegis.mim.dk/cbkort?profile=miljoegis-plangroendk</a>) 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. This would allow for expert and stakeholder review and comments. It must be ensured that <b>biologically valuable</b> dead and decaying and deadwood on the forest floor is not chipped or removed in connection with production and extraction of biomass.</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.*

<b>NC number</b> 01/19	<b>NC Grading:</b> Minor
<b>Standard &amp; Requirement:</b>	Standard #2: Verification of SBP-compliant feedstock Requirement 2.2
<b>Description of Non-conformance and Related Evidence:</b>	
The Organisation has not used the most recent version of the SBR template (version 1.3 from January 2019).	
<b>Timeline for Conformance:</b>	By the next surveillance audit, but no later than 12 months from report finalisation date
<b>Evidence Provided by Company to close NC:</b>	Pending
<b>Findings for Evaluation of Evidence:</b>	Pending
<b>NC Status:</b>	Open

<b>NC number</b> 03/18	<b>NC Grading:</b> Observation
<b>Standard &amp; Requirement:</b>	SBP Standard 2, requirement 16.1
<b>Description of Non-conformance and Related Evidence:</b>	
<p>During the field audits, the current level of protection of biologically valuable dead wood during felling and chipping operations was discussed, and while good awareness was generally found on the importance of dead wood to the biodiversity of the forests, and single case of biologically important dead tree was found in a stack of wood that had been extracted for chipping. The responsible forester explained that his evaluation had been that since this particular Forest Management Unit still had compartments with a relatively high level of biologically important deadwood, that the biodiversity of this particular FMU would not be compromised from extracting this single tree, as requested by the forest owner. The BP should ensure that it is always ensure that biologically important trees and deadwood is protected during wood chip production.</p>	
<b>Timeline for Conformance:</b>	Other
<b>Evidence Provided by Company to close NC:</b>	During this year's audit, no critical mass of deadwood was found in stacks observed.
<b>Findings for Evaluation of Evidence:</b>	By observations and interviews auditor concluded that the company has focus on this area and avoids cutting deadwood.
<b>NC Status:</b>	Closed

## 11 Certification decision

<b>Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:</b>	
<b>Certification decision:</b>	Certification approved
<b>Certification decision by (name of the person):</b>	Ondrej Tarabus
<b>Date of decision:</b>	08/Oct/2019
<b>Other comments:</b>	N/A