

Supply Base Report: Skovbygaard A/S

First Surveillance Audit

www.sbp-cert.org



Completed in accordance with the Supply Base 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

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1 Overview

Producer name: Skovbygaard A/S
 Producer location: Alstrupvej 32, 9700 Brønderslev, Denmark
 Geographic position: 57.283483, 9.755724
 Primary contact: Kasper Nielsen
 Company website: www.skovbygaard.com
 Date report finalised: 11/Apr/2019
 Close of last CB audit: 12/Apr/2019
 Name of CB: DNV GL Business Assurance Finland Oy Ab
 Translations from English: Yes
 SBP Standard(s) used: Standard 1 v1.0, Standard 2 v1.0, Standard 4 v1.0, Standard 5 v1.0
 Weblink to Standard(s) used: <https://sbp-cert.org/documents/standards-documents/standards>
 SBP Endorsed Regional Risk Assessment: RRA Denmark, June 2017
 Weblink to SBE on Company website: www.skovbygaard.com

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2 Description of the Supply Base

2.1 General description

General description of Danish forests and forestry

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

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

Generally, Danish forests include a wide variety of wood species of which the most common species are: Norway spruce 15%, beech 14% and oak 10%. The numbers for the other wood species are: pine 11%, silver spruce 6%, Nordmann fir 5%, noble fir 2%, other fir species 10%, Sycamore maple 4%, birch 7%, ash 3% and other broadleaves 9%. In addition to this, unstocked areas are 4%. Broadleaves make up 47 per cent of the total wooded area whereas conifers make up 49 per cent. The rest is unstocked areas and areas where a particular wood species could not be determined. None of the wood species belong to the CITES or IUCN species.

Approx. 2000 species are listed on the Danish Red List, and many of these species are related to forests, old forests in particular. Areas in which one or more red list species have been identified are often registered as Natura 2000 areas, protected by the Danish Forest Act and/or the Danish Nature Protection Act. Red list species are found here: <http://naturstyrelsen.dk/media/nst/67066/rodliis.pdf>.

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

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

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

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

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

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

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

General description of Danish windbreaks

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

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

Description of the supply base

Skovbygaard's supply base is Danish forests, windbreaks, scenic areas and urban plantations where the supply base covers all of Denmark, however, mainly North-Jutland.



Figure 1 Supply Base

Skovbygaard is a forest contractor that produces and sells wood chip. Wood chip production is approx. 25,000-35,000 tonnes a year; 45% of the wood chip is produced in areas outside forests, mainly windbreaks and small plantations and in connection with nature projects. The base also includes clearing of trees and shrubs in connection with developments and expansion of infrastructure in Denmark.

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

Description of jobs

Thinnings:

In windbreaks, the base mainly consists of the removal of nurse trees and pollarding of shrubs but in order to keep the sheltering effect of the windbreak. The work is carried out using feller bunchers and feller forwarders. In the forest, thinnings are carried out by feller bunching in connection with the running of tracks

and thinning of younger standing crop. The subsequent chipping is carried out using an off-road chipper or a truck chipper.

Tree tops:

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

Round timber:

Produced as a by-product from the felling of conifers where timber is also produced. The chip utilised timber of a low quality which cannot be used for products of high quality, such as timber. Felled using a harvester, forwarded to a solid road, chipped by the roadside or transported to a storage yard where the chipping is carried out.

Clearcuts:

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

Tabel 1 Distribution raw material input in %

	Nåletræ	Løv	Blandet
Controlled feedstock			
SBP-Compliant primary	60 %	20%	20%
SBP-Compliant Secondary			
SBP-Compliant Tertiary			
SBP-non-compliant			

Sources:

Nord-Larsen, Thomas et al, *Skove og Plantager 2014*, Skov og Landskab, 2014

PEFC Denmark, <http://www.pefc.dk/bliv-certificeret/skovcertificering>

FSC Denmark, <https://dk.fsc.org/dk-dk/hvad-er-fsc/fsc-i-danske-tal>

Legal information: <https://www.retsinformation.dk/eli/ft/198812K00030>

Hedges to the benefit of animals and plants: <https://jaegernesmagasin.dk/wp-content/uploads/Levende-hegn-til-gavn-for-dyr-og-planter.pdf>

Red list species: <http://bios.au.dk/videnudveksling/til-myndigheder-og-saerligt-interesserede/redlistframe/artsgrupper/>

2.2 Actions taken to promote certification amongst feedstock supplier

No measures have been launched to further certification at the forests where raw materials are felled as this is outside the company's powers.

2.3 Final harvest sampling programme

Skovbygaard also focuses on ensuring a financially sound result for our customers working in the forest. That's why, high value products primarily and only biomass will be produced when felling standings of more than 40 years. The price difference on energy wood for biomass and wood for timber, logs or packing wood means that it is not financially sound to produce energy wood if a higher value product may be produced. When wood from clear fellings of more than 40 years ends up in biomass, part of the wood does not meet the quality requirements for e.g. timber. The reasons may be rot, damage, warping, splits, windfall, etc.

Tabel 2 Final harvest sampling. Data from 5 randomly selected felling projects. Quantity of round timber from felling of stands of more than 40 years is approx. 20%

Summary		
Period	1.1.2017-1.1.2018	
Effect	Quantity	%
SHORT TIMBER	631.2	22.25
PACKAGING	558.51	19.69
CELL	244.44	8.62
TREE TOPS	1402.31	49.44
TOTAL	2836.46	100.00

2.4 Flow diagram of feedstock inputs showing feedstock type [optional]

Not included (Optional).

2.5 Quantification of the Supply Base

Supply Base

- a. Supply base area (ha): 624,676 ha forest
- b. Ownership (ha): 434,685 privately owned, 27,696 owned by foundations, 150,298 owned by the state, 11,997 unknown owner
- c. Forest type (ha): Temperate
- d. Forestry (ha): 488,020 ha plantation or planted forest, 100,584 ha forest managed natural, 36,072 other/unknown.
- e. Certified forest by schemes (ha): approx. 268,592 ha of PEFC certified forest and 213,976 ha of FSC certified forest (overlapping areas).

Feedstock

- f. Total volume of Feedstock: 25-35.000 T
- g. Volume of primary feedstock: 25-35.000 T
- h. List percentage of primary feedstock (g), by the following categories:
 - Certified to an SBP-approved Forest Management Scheme: 0%
 - Not certified to an SBP-approved Forest Management Scheme: 100%
- i. List all species in primary feedstock, including scientific name:

Danish	English	Latin
Ahorn	Sycamore	<i>Acer pseudoplatanus</i>
Ask	Ash	<i>Fraxinus excelsior</i>
Dunbirk	White birch	<i>Betula pubescens</i>
Vortebirk	Silver birch	<i>Betula pendula</i>
Bjergfyr	Mountain pine	<i>Pinus mugo</i>
Bævreasp	Aspen	<i>Populus tremula</i>
Bøg	Beech	<i>Fagus sylvatica</i> .
Contortafyr	Lodgepole pine	<i>Pinus contorta</i>
Cypres	Lawson cypress	<i>Chamaecyparis lawsoniana</i>
Douglas	Douglas fir	<i>Pseudotsuga menziesii</i>
Stilkeg	Common Oak	<i>Quercus robur</i>
Vintereg	Sessile Oak	<i>Quercus petraea</i>
Elm	Mountain elm	<i>Ulmus glabra</i>
Grandis	Grand fir	<i>Abies grandis</i>
Hestekastanie	Horse chestnut	<i>Aesculus hippocastanum</i>

Hvidgran	White spruce	Picea glauca
Lind	Common lime	Tilia cordata
Lærk	European larch	Larix decidua
Lærk	Japanese larch	Larix leptolepis
Hybridlærk	Dunkeld Larch	Larix eurolepis
Nobilis	Noble fir	Abies procera
Nordmannsgran	Nordmann fir	Abies normanniana
Omorika	Serbian spruce	Picea omorica
Poppel	Poplar	Populus sp.
Rødeg	Northern red oak	Quercus rubra
Rødel	Common alder	Alnus glutinosa
Rødgran	Norway spruce	Picea abies
Sitkagran	Sitka spruce	Picea sitchensis
Skovfyr	Scots pine	Pinus sylvestris
Spidsløn	Maple	Acer platanoides
Thuja	Western red cedar	Thuja plicata
Ædelgran	Silver fir	Abies alba
Østrigsk fyr	Austrian pine	Pinus nigra

- j. Volume of primary feedstock from primary forest: 0T
- 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: specify origin and type: 0%
- m. Volume of tertiary feedstock: 0%

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
x	<input type="checkbox"/>

Skovbygaard harvests most of the feedstock outside the forest (arbo-cultural arising) and in non-certified forests. To be able to document compliance with SBP and to be able to sell the biomass as SBP-compliant biomass, the supply base needs to be evaluated.

4 Supply Base Evaluation

4.1 Scope

The scope of the evaluation covered the entire supply base of Skovbygaard, which is considered all existing and potential sources of primary feedstock and their origin. The purpose of SBE is to distinguish the risk level in relation to the indicators described in SBP Standard 1.

The feedstock is divided into the following scopes:

1. Primary feedstock from FSC or PEFC certified forests
2. Primary feedstock from forests with a green management plan
3. Primary feedstock from thinnings of conifer stands
4. Primary feedstock from thinnings of first generation forest estates
5. Primary feedstock from forests without a green management plan or certification
6. Primary feedstock from non-forest areas, such as windbreaks, city and park areas

Most of the biomass is processed by in-house trained staff. A minor part of the feedstock is produced by loosely affiliated partners Skovbygaard handles traceability, risk assessments and risk management.

4.2 Justification

This evaluation is based on the National Risk Assessment (RRA) for Denmark approved by SBP in June 2017. RRA for Denmark is available here: <https://sbp-cert.org/documents/consultation-documents/draft-regional-risk-assessments>. RRA for Denmark was completed in accordance with SBP Standard no. 1. Skovbygaard's evaluation and use of RRA for Denmark was completed in accordance with SBP Standard no. 2.

Based on the results of RRA for Denmark and an analysis of the company's working procedures, useful measures to reduce the risk and a supplier verification programme have been prepared and implemented to ensure a low risk for all indicators in connection with the production of primary feedstock.

Skovbygaard is aware of the fact that changes in the RRA for Denmark approved by SBP may occur and is willing to adapt the SBE if this should happen.

4.3 Results of Risk Assessment

The RRA for Denmark approved by SBP, June 2017, concludes that the risk is low in relation to all criteria except from the following criteria where a 'specified risk' has been identified: Criteria 2.1.1, 2.1.2, 2.2.3 and 2.2.4.

Table 3 Individual indicators with a 'specified risk' in the National Risk Assessment

2.1.1	Forests and other areas with high conservation values in the Supply Base are identified and mapped.
2.1.2	Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.
2.2.3	Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
2.2.4	Biodiversity is protected (CPET S5b).

Based on the SBP endorsed RRA for Denmark, June 2017, Skovbygaard has concluded that the supply base can be divided into the following sub-scopes which coincide with the scopes listed in the RRA:

1. Primary feedstock from FSC or PEFC certified forests
2. Primary feedstock from forests with a green management plan
3. Primary feedstock from thinnings of conifer stands
4. Primary feedstock from thinnings of first generation forest estates
5. Primary feedstock from forests without a green management plan or certification
6. Primary feedstock from non-forest areas, such as windbreaks, city and park areas, nature projects.

For each of these sub-categories, a specified risk has only been assigned to categories 2 and 5. These are reviewed below with the supplier verification programme and the prepared measures to reduce the risk.

4.4 Results of Supplier Verification Programme

Skovbygaard's supplier verification programme includes the following:

- n. For all suppliers (forest owners), Skovbygaard A/S enters into an agreement with the forest agreement about the task where, during the pre-meeting, questions are asked whether the forest is FSC and / or PEFC certified, whether a green management plan and / or a key biotope registration have been prepared for the property.
- o. Skovbygaard A/S physically visits, inspects and reviews the areas of all suppliers in connection with the screening and before felling. This means that it is highly certain that the areas are reviewed and screened correctly. Biomass is only sold as SBP-compliant biomass if it originates from suppliers for which a Low Risk can be established for the four indicators with specified risks through measures to reduce the risk.
- p. Skovbygaard will purchase biomass from other supplier only in special cases and if so, Skovbygaard will handle risk assessment and minimise the risk, if any, as described above.

4.5 Conclusion

When reviewing and revising the work procedures of Skovbygaard based on the SBP-approved RRA for Denmark, as well as preparing and implementation of the supplier verification program (SVP) and risk-

reducing measures, it is assessed that the company ensures that biomass complies with the requirements set in the SBP certification.

Kasper Nielsen and Joachim Nielsen, who handle job planning, identification of key biotopes and project mapping, have a wide experience in working in the forest and making considerations for nature worth conserving.

The BP is aware of the fact that if jobs are carried out in areas with a specified risk, it is necessary to have other qualified persons, such as biologists or foresters, help with the identification of key biotopes. During the startup phase, it is important to integrate regulations and adaptations when the company have become more familiar with the new standards and procedures.

5 Supply Base Evaluation Process

Skovbygaard uses the SBP endorsed RRA for Denmark 2017 as a starting point.

As it appears from the RRA for Denmark, a low risk has been identified for all indicators, apart from the following indicators where a 'specified risk' has been identified: 2.1.1, 2.1.2, 2.2.3, 2.2.4 for forest type category 2 and 5.

In order to minimise the risk of these 4 indicators with a specified risk in processing biomass, Skovbygaard has prepared a set of working procedures with the implementation of control measures to reduce the risk which comply with the due diligence requirements of the standards. The working procedures, including the measures to reduce the risk, are detailed in the company's Contractors' Manual.

Skovbygaard has used both internal and external resources for the work with SBE. SBE has been prepared with SBE's staff who has a wide experience in biomass production.

Machine operators at Skovbygaard have a high level of skills with many years' work with production of feedstock.

Skovbygaard has used an external consultant from DM&E who has approx. 13 years' experience in forest certification and forest management, for the work of adapting work processes and gathering additional data.

6 Stakeholder Consultation

The consultation phase ran for a period of 30 days from 09.02.2018 to 09.03.2018. The Danish version of the SBR, including the control measures to reduce the risk, was sent by e-mail to the following stakeholders:

Danmarks Naturfredningsforening (Danish Society for Nature Conservation)	Nora Skjernaa Hansen	nsh@dn.dk
FSC Danmark	Sofie Tind Nielsen	sofie@fsc.dk
Verdens Skove	Jakob Ryding	jr@verdensskove.org
WWF (World Wildlife Foundation)	Bo Normander	b.normander@wwf.dk
Copenhagen University	Vivian Kvist Johansen	vkj@ign.ku.dk
PEFC Danmark	Morten Thorøe	mt@pefc.dk
Dansk Energi	Kristine van het Erve Grunnet	keg@danskenergi.dk
Dansk Fjernvarme	Kate Wieck-Hansen	kwh@danskfjernvarme.dk
Dansk Skovforening (Danish Forest Association)	Marie-Louise Bretner	mlb@skovforeningen.dk
Energistyrelsen (Danish Energy Agency)	Lars Martin Jensen	lmj@ens.dk
Ørsted	Peter K Kristensen	pekkr@dongenergy.dk
Friluftsrådet (National Federation of Outdoor Recreation)	Thorbjørn Eriksen	toe@friluftsradet.dk
BAT Kartellet	Gunde Odgaard	gunde.odgaard@batkartellet.dk
The Danish Nature Agency	Niels Bølling	niboe@nst.dk
NOVOPAN A/S	Jette Wulff	j.wulff@kronospan-dk.dk
Troldtekt A/S	Orla Jepsen	oje@troldtekt.dk
Rold Skov Savværk A/S	Henrik Thorlacius-Ussing	htu@lindborg.dk
Norlund Savværk	Simon Mikkelsen	smi@norlundwood.com

6.1 Response to stakeholder comments

No comments were received during the period of public comment.

7 Overview of Initial Assessment of Risk

Skovbygaard uses the SBP endorsed RRA for Denmark 2017 as a starting point.

As it appears from the RRA for Denmark, a low risk has been identified for all indicators, apart from the following indicators where a 'specified risk' has been identified: 2.1.1, 2.1.2, 2.2.3, 2.2.4 but not for all forest types / scopes.

To minimise the specified risks and move a 'Specified risk' to a 'Low Risk', Skovbygaard is working according to its management system, described in the Contractors' Manual and reviewed in Section 9.1. The management system describes among other things how Skovbygaard minimises the risks in the area where there is a risk that the biomass is not sustainable.

Based on the RRA for Denmark, Skovbygaard divides the supply base into the same sub-categories as are described in item 2.1.1 in the RRA for Denmark:

1. Primary feedstock from FSC or PEFC certified forests (low risk)
2. Primary feedstock from forests with a green management plan (low risk)
3. Primary feedstock from thinnings of conifer stands (low risk)
4. Primary feedstock from thinnings of first generation forest estates (low risk)
5. **Primary feedstock from forests without a green management plan or certification (specified risk)**
6. Primary feedstock from non-forest areas, such as windbreaks, city and park areas, nature projects (low risk).

First, the results of the RRA for Denmark endorsed by SBP are stated below.

Table 1. sub-categories: 1, 2, 3, 4 and 6. Risk rating in the RRA for all indicators.

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
1.1.1		x	
1.1.2		x	
1.1.3		x	
1.2.1		x	
1.3.1		x	
1.4.1		x	
1.5.1		x	
1.6.1		x	
2.1.1		x	
2.1.2		x	
2.1.3		x	
2.2.1		x	
2.2.2		x	
2.2.3		x	
2.2.4		x	
2.2.5		x	
2.2.6		x	
2.2.7		x	
2.2.8		x	
2.2.9		x	

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
2.3.1		X	
2.3.2		X	
2.3.3		X	
2.4.1		X	
2.4.2		X	
2.4.3		X	
2.5.1		X	
2.5.2		X	
2.6.1		X	
2.7.1		X	
2.7.2		X	
2.7.3		X	
2.7.4		X	
2.7.5		X	
2.8.1		X	
2.9.1		X	
2.9.2		X	
2.10.1		X	

Table 2. sub-category: 5) Primary feedstock from forests without green management plan or certification. Risk rating in the RRA for Denmark.

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
1.1.1		X	
1.1.2		X	
1.1.3		X	
1.2.1		X	
1.3.1		X	
1.4.1		X	
1.5.1		X	
1.6.1		X	
2.1.1	X		
2.1.2	X		
2.1.3		X	
2.2.1		X	
2.2.2		X	
2.2.3	X		
2.2.4	X		
2.2.5		X	
2.2.6		X	
2.2.7		X	
2.2.8		X	
2.2.9		X	

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
2.3.1		X	
2.3.2		X	
2.3.3		X	
2.4.1		X	
2.4.2		X	
2.4.3		X	
2.5.1		X	
2.5.2		X	
2.6.1		X	
2.7.1		X	
2.7.2		X	
2.7.3		X	
2.7.4		X	
2.7.5		X	
2.8.1		X	
2.9.1		X	
2.9.2		X	
2.10.1		X	

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

Primary Feedstock

Skovbygaard handles the entire process for most of the wood chip sold by Skovbygaard. This means customer contact, job planning, job execution as well as the transport and sale of wood chip. Using the management system from the Contractors' Manual, Skovbygaard documents origin, risk assessment/screening of the area and risk reduction, if any.

A minor part of the wood chip is purchased from other forest contractors. This is not a group of supplier from whom wood chip is bought on an ongoing basis. The quantities are often small, and it may be years between various suppliers selling wood chip to Skovbygaard.

The procedure for the purchase of external wood chip will be that Skovbygaard handles the purchase of feedstock from subcontractors as if it was its own project. Skovbygaard handles mapping, risk assessment, area review and minimises risks.

If parts of the feedstock are assessed in this process to be non-SBP compliant, it will not be sold with an SBP Claim.

8.2 Site visits

The management of Skovbygaard reviews all jobs in the field, often together with the supplier (forest owner / landowner) before the job is started up. In connection with field visits, questions will be asked regarding a green management plan or forest certification. If the property is certified or there is a green management plan, the map with key biotope registration must be delivered to Skovbygaard.

When the job is completed, it is ensured by field review that the task has been solved satisfactorily. If errors have occurred, the owner and relevant authorities will be contacted. For protracted jobs, management will usually inspect the job during the process. This allows errors and non-conformities to be corrected on an ongoing basis.

8.3 Conclusions from the Supplier Verification Programme

For all suppliers (forest owners), field visits at all jobs and map screening have allowed Skovbygaard the greatest possible safety to locate areas where there is a need for extra attention when working in the forest. When following up on the tasks when they have been completed, Skovbygaard has the opportunity to find errors in their processes and rectify any inappropriate working methods and procedure.

9 Mitigation Measures

9.1 Mitigation measures

Introductory remarks

Skovbygaard is working according to the procedures of the Contractors' Manual¹ which is laid out to consider the indicators described in the RRA for Denmark, approved by SBP, June 2017.

The BP's Manual describes how to identify whether the forest area belong to the scope of specific risk and which measures to reduce the risk should be taken before the feedstock can be called SBP compliant. If Skovbygaard is not able to reduce the risk for parts of the biomass, it will not form part of the SBP quantity.

Projects at Skovbygaard are planned, assigned and controlled by the project managers at the BP.

Risk assessment of individual forest areas:

In all new jobs, the areas on which biomass is harvested will be screened according to the following indicators: 2.1.1, 2.1.2, 2.2.3, 2.2.4. The screening is based on available map material and databases as well as a visual review of the area before startup. A map and checklist is prepared for each job to ensure that the machine operator is aware of protected or preserved nature/culture.

The forest area is first classified as one of the six scopes.

1. Primary feedstock from FSC or PEFC certified forests - **low risk**
2. Primary feedstock from forests with a green management plan - **low risk**
3. Primary feedstock from thinnings of conifer stands - **low risk**
4. Primary feedstock from thinnings of first generation forest estates - **low risk**
5. Primary feedstock from forests without a green management plan or certification - **specified risk**
6. Primary feedstock from non-forest areas, such as windbreaks, city and park areas, nature projects - **low risk**

Classification according to this division for each harvesting site is made by Kasper Nielsen and Joachim Nielsen, who have good knowledge of identifying key biotopes according to the Danish key biotope catalogue. . If the area is assessed as a scope 5 area with a specific risk, an external assessment from a forester / biologist / MSc in forestry with local knowledge will be used.

Risk handling:

The staff carrying out screenings and planning the jobs are familiar with applicable nature and environment legislation. Skovbygaard plans supply activities in the supply base to minimise the negative effect on ecosystems, biodiversity and areas worth preserving.

Areas where wood chip is harvested must be examined before startup by a physical review and must be mapped according to the procedure below. All procedures are explained in the Contractors' Manual.

¹ Document detailing the company's procedure.

A map is prepared for each wood chip project. The map shows identified areas with a high conservation value (HCV). If a map has been prepared in connection with the certification of a green management plan, such maps must be used in the planning process in order to ensure HCV areas.

- All working areas will be screened through DM&E's map portal and reviewed by the management before start-up based on the checklist in the Contractors' Manual.
- Each wood chip project is given a unique case number and address which also appear on the job description, weighing forms and basis of settlement. Ensure traceability.
- Each wood chip project has a Checklist with relevant information. Ensure excellent communication between the various parties in the work process and note down all relevant data which the machine operator needs.

The map and checklist are delivered to the machine operator who is trained in the company's work procedure and the meaning of the elements on the map.

To be able to identify HCV areas during work, all machine operators working with wood chip production in the forest have been trained in "Maskinfærdsel på Naturnære arealer" (Machine traffic in nature areas).

9.2 Monitoring and outcomes

Increased focus will apply during the first 12 months of jobs with the highest risk of felling activities harming HCV areas. In old forest areas, they will consist mainly of broadleaves.

Last year, only a few jobs have been completed in this type of forest while the majority of jobs were completed in low-risk areas. The effect of this measure will be assessed at the next internal audit.

For the control measures to reduce the risk completed and SVP with the procedures of screening and visual visits to all supply areas described and integrated, a low risk has been achieved for the indicators with a specified risk:

- 2.1.1 Forests with high conservation values, HNV has been mapped and identified
- 2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities have been identified and addressed
- 2.2.3 Protection of key biotopes and habitats
- 2.2.4 Safeguarding biodiversity

Which is thereby reduced to pose a low risk.

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10 Detailed Findings for Indicators

Detailed results for indicators in the risk assessment are presented in the SBP approved RRA for Denmark, June 2017.

11 Review of Report

11.1 Peer review

The report has been peer reviewed by B.Sc. in Forestry Claus Clemmensen.

11.2 Public or additional reviews

No further reviews. As part of the IA, the report is read by Lead Auditor Karina Seeberg Kitnæs from Orbicon on behalf of DNV GL.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:		<i>Company owner</i>	<i>11.04.2019</i>
	<i>Kasper Nielsen</i>		
	Name	Title	Date
Report Prepared by:		<i>Forest consultant, B. sc in forestry</i>	<i>11.04.2019</i>
	<i>Claus Hansen</i>		
	Name	Title	Date
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:		<i>Company owner</i>	<i>11.04.2019</i>
	<i>Kasper Nielsen</i>		

13 Updates

Once a year prior to the external audit, Skovbygaard will carry out self-regulatory control according to the procedure described in the Contractors' Manual. The self-regulatory control will assess:

1. changes in the supply base. Whether changes have occurred which call for changes to elements of the Supply Base Report.
2. It must be assessed whether the measures taken to reduce the risks are adequate. Every 10th high-risk job will be reassessed.

13.1 Significant changes in the Supply Base

No changes.

13.2 Effectiveness of previous mitigation measures

Internal review of high-risk projects shows that protection and conservation of conservation-worthy nature have been taken into account, as well as focus on preserving the biodiversity of the area. It is therefore our opinion that the risk minimization measures are adequate.

13.3 New risk ratings and mitigation measures

No changes.

13.4 Actual figures for feedstock over the previous 12 months

9195 T

13.5 Projected figures for feedstock over the next 12 months

20.000 T