SBP

Sustainable Biomass Program

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

Third 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

Document history

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1 Overview

CB Name and contact:	NEPCon OÜ, Filosoofi 31, 50108 Tartu, Estonia
Primary contact for SBP:	Ondrej Tarabus ot@nepcon.org, +420 606 730 382
Current report completion date:	03/Apr/2019
Report authors: :	Christian Rahbek
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 Third 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 (June 2017) Regional Risk Assessment for Denmark. The document is available for download at the SBP website: 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 Øerne a.m.b.a. is a cooperative 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/ This webpage includes links to both the SBR in Danish and English and to separately posted Annual Updates for the 2019 reporting period, also in Danish and English

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". At the same time as the 2020 SBP surveillance audit, the BP also underwent a FSC CoC/CW Main assessment, but the PEFC CoC system remains the underlying CoC system for SBP.

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 woodchipper 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 14th, 15th, 20th and 21st of January 2020 in accordance with the audit plan below, and it included visit to the Skovdyrkerforeningen Øerne A.m.b.a. main office in Vissenbjerg, Denmark (Jan 20th) and field visits of, in total, 18 sites (16 forest sites and 2 storage sites) at the islands Bornholm, Lolland, Falster and Zealand. 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 from which wood chips had been sold with a SBP claim for 2019 corresponded was 327. This results in a minimum sample of $\sqrt{(327)} \times 0.8 \approx 15$ projects.

A total of 3,5 days was used for this evaluation: 0,5 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. The annual surveillance audit process started with an opening meeting in the Bornholm office of the BP attended by both overall responsible, daily responsible and the local forester. After this, the field visits were started by consulting the Biomass Producer's records of planned, ongoing and recent wood chip production projects to determine the sample size. The field visits were conducted during two and a half days by one auditor. On Monday January 20th the main office evaluation of documented procedures, projects administration, records and invoices/claims took place in Vissenbjerg, Funen.

After the last days of field visits at the wood chip production sites, the Lead Auditor (CAR) held a closing meeting via telephone conference from the field in late the afternoon of the 21st of January 2020. 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	Bornholm office	CAR	**January 14, 2020** 13:30 to 14:00
Planning of field visits	Bornholm office	CAR	14:00 to 14:30
Field Visit to forest/wood chip projects	Bornholm	CAR	14:30 to 16:30
Activity	**Location**	**Auditor (s)**	**Date / Time**

Field Visit to forest/wood chip projects and storages after agreement with company	Bornholm	CAR	**January 15, 2020** 8:30 to 14:00
Activity	**Location**	**Auditor (s)**	**Date / Time**
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 • 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	Main office	CAR	**January 20, 2020** 09:00 to 12:00
Break	Main office	CAR	12:00 to 12:30
Continuing review of Management System referred to above.	Main office	CAR	12:30 to 14:00
Review of SBP CoC system and Credit System, DTS, and the use of logos	Main office	CAR	14:00 to 15:00
Planning of field visits and preliminary summary	Main office	CAR	15:00 to 15:30
Activity	**Location**	**Auditor (s)**	**Date / Time**

Field Visit to forest/wood chip projects and storages after agreement with company	Field: Lolland, Falster, Zealand	CAR	**Jan 21st, 2020** 10:00 – 16:00
Closing Meeting: Auditor summarizes the results of the evaluation	Field	CAR	Jan 21st, 2020 16:00 - 16:30

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. More than 9 years of auditor experience from FSC, PEFC and SBP audits in Denmark and abroad. Christian is an approved SBP Lead auditor and has partaken in several SBP assessments and audits in Denmark, Latvia, Canada, Sweden and Brazil.

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 the 2017 main assessment. Neither the BP nor the CB has received any comments from stakeholders before this year's evaluation.

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 owners in the cooperative, 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 BP has used the SBP endorsed regional risk assessment which has been widely circulated for stakeholder consultation. Based on the “specified risks” in this risk assessment the organization has implemented relevant mitigation measures.

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 daily responsible for the SPB system, the 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 the SPB system Mr. 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

Neither the BP nor NEPCon has received any comments from stakeholders regarding the BP's activities. As a result of occasional news stories regarding wood chip projects in the island of Bornholm NEPCon is engaging with stakeholders in this location, both via email sent out October 21st, 2019 (exhibit 10) and participating in a stakeholder forum in Bornholm January 14, 2020. This yielded no direct comments or complaints from stakeholders, but NEPCon will continue stakeholder outreach in Bornholm.

7.6 Preconditions

This evaluation has not resulted in any preconditions.

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 uses the final risk ratings of Indicators as determined in the SBP-endorsed (June 2017) Regional Risk Assessment for Denmark (RRA) and has established and implemented risk mitigating measures to achieve a low risk rating.

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

Indicator	Risk rating (Low or Specified)	
	Producer	CB
1.1.1	Low	Low
1.1.2	Low	Low
1.1.3	Low	Low
1.2.1	Low	Low
1.3.1	Low	Low
1.4.1	Low	Low
1.5.1	Low	Low
1.6.1	Low	Low
2.1.1	Specified	Specified
2.1.2	Specified	Specified
2.1.3	Low	Low
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Specified	Specified
2.2.4	Specified	Specified
2.2.5	Low	Low
2.2.6	Low	Low
2.2.7	Low	Low
2.2.8	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

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

Skovdyrkerne Øerne has used the mitigation measures in the SBP endorsed (June 2017) Regional Risk Assessment for Denmark, which found 4 Indicators with specified risk. The table below shows the specified risk Indicators and the corresponding mitigation methods that Skovdyrkerne Øerne are implementing. 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

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.*

NC number 01/20	**NC Grading:** Minor
Standard & Requirement:	Instruction Document 5E requirement 3.1.9
Description of Non-conformance and Related Evidence:	
During the audit it was found that the transport data for the total trucking distance from the forest or origin did not include the distance from the forest to the storage facilities, but only from the storage facilities to the end-point at the heating plant. It was explained the they staff in charge had overlooked additional transport distance that would result from delivering rom the storage facilities. The actual difference in transport distance was not very large, and only one end-point had been affected. Hence a minor NCR 01/20 was raised	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 monhts from report finalisation date
Evidence Provided by Company to close NC:	Immediately following the audit the BP sent an updated SREG for the affected customer. See exhibit 11.
Findings for Evaluation of Evidence:	Auditor finds that this corrective action is sufficient, and the NCR is closed on this background.
NC Status:	Closed

11 Certification decision

Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Ondrej Tarabus
Date of decision:	03/Apr/2020
Other comments:	*Click or tap here to enter text.*