



DNV GL Business Assurance Finland Oy Ab Evaluation of Skovbygaard A/S Compliance with the SBP Framework: Public Summary Report

Second 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 www.sbp-cert.org

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1 Overview

CB Name and contact:	DNV GL Business Assurance Finland Oy Ab
Primary contact for SBP:	Jyrki Sopenen (jyrki.sopenen@dnvgl.com)
Current report completion date:	15/May/2020
Report authors:	Karina Seeberg Kitnaes
Name of the Company:	Skovbygaard A/S
Company contact for SBP:	Kasper Nielsen (kasper@skovbygaard.com)
Certified Supply Base:	Denmark
SBP Certificate Code:	SBP-05-10
Date of certificate issue:	27/Jun/2018
Date of certificate expiry:	26/Jun/2023

This report relates to the Second Surveillance Audit

2 Scope of the evaluation and SBP certificate

Introduction

Skovbygaard A/S is a biomass trader and producer of wood chips based in Denmark. In the context of SBP, Skovbygaard A/S purchases primary feedstock as roundwood or wood chips at roadside in Danish forests. The feedstock is transported by truck directly to the customers or to the storage, where the BP stores the wood chips until the biomass is then loaded onto trucks to delivery to customers in Denmark.

The period of ownership begins when the feedstock is picked up at roadside and transported from the forest. The period of ownership ends when the biomass (wood chips) is offloaded at the customer.

Scope

The company is a biomass producer with company office and storage, performing the following: purchase of roundwood and woodchips, mobile chipping, trade and transport of wood chips from Danish forests for use in energy production in Denmark. The scope of the certificate does include Supply Base Evaluation for the Supply Base Denmark.

3 Specific objective

The specific objective of this evaluation was to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of the certification.

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

SBP endorsed Regional Risk Assessment for Denmark, June 2017.

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

Skovbygaard A/S is a Danish company, which operates as a forest contractor and purchases roundwood and wood chips from Danish forests and surrounding landscapes. The company produces and trades wood chips. The company office located in the Northern Part of Jylland in Denmark is responsible for the trading, chain-of-custody and the wood chipping. In the context of SBP, the company has one storage facility located next to the company office. The raw materials are primary feedstock (roundwood) originating from Danish forests and surrounding landscape, which are chipped in the forest as part of the harvest operation and then either placed at roadside (temporary storages) or transported to the company' permanent storage facility. The wood chips are sold and transported to the Danish energy sector, where the buyer takes over the responsibilities. The company holds valid PEFC COC certificate. The feedstock is either PEFC certified or non-certified, which is controlled through the company SBE including SVP and use of the SBP endorsed RRA for Denmark.

5.2 Description of Company's Supply Base

The feedstock to the BP is sourced from the supply Base: Denmark. The feedstock is supplied through the harvest and chipping operations screened, performed and monitored by the BP. The feedstock is supplied as either Roundwood or Wood chips produced in the forest of origin or at the storage facility within Denmark. The harvest and chipping operations are performed by the company under the monitoring of the forest managers. The BP has conducted the supply base evaluation (SBE) with SVP and using the SBP-endorsed RRA for Denmark. The Public SBR with the description of the SBE has been updated by the BP in the Danish and English version to be uploaded on the webpage of SBP. The SBP endorsed RRA for Denmark, June 2017, is available on <https://sbp-cert.org/documents/standards-documents/risk-assessments/>. The BP implements risk mitigation measures sufficient to secure low risk of specified risk indicators of the RRA.

General description of the forest resources and forest management practices within the Supply Base:

Land use and forest composition: Total Supply Base area (ha): Danish forest area: 625 000 ha of temperate forests (approx. 15 pct. of the land area); Other woodland area: 44 000 ha (approx. 1 pct. of the land area).

Conifers have apart from one species been introduced long ago and they been successful in Denmark because they thrive on heath and dune areas, and because they grow quickly and therefore they have been more profitable for forest owners than deciduous trees. This is one reason why there are most conifers in Jutland. Conifers take up 50% of the total forest land, while deciduous trees account for 46.4%. Most species of deciduous trees, such as oak and beech, are indigenous to Denmark, while conifers have been imported over the past 200-300 years. For example, the most common tree species in Denmark is the Norway spruce and to some extent other species such as Sitka spruce and Douglas fir. Norway spruce grow on 19% of the forest area and it is the most common tree species in Denmark.

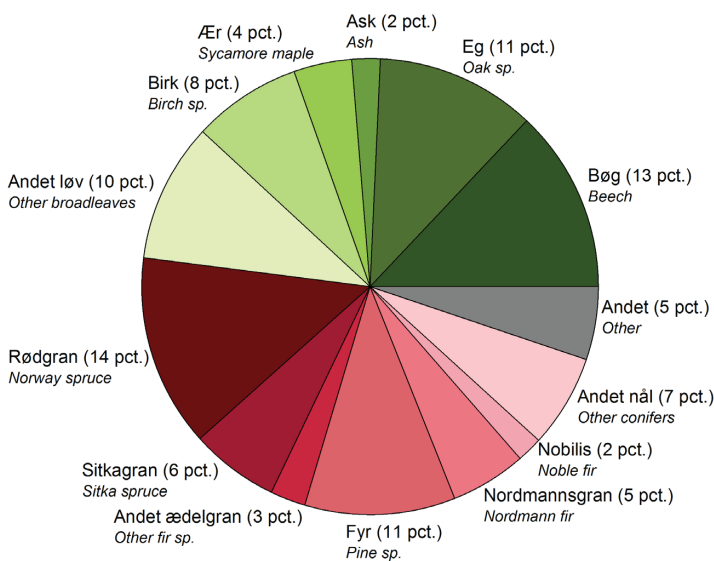


Figure. Distribution of the forest area to tree species and species groups. Distribution is made according to share of basal area (ref. Thomas Nord-Larsen, Vivian Kvist Johannsen, Torben Riis-Nielsen, Iben Margrete Thomsen og Bruno Bilde Jørgensen (2020): Skovstatistik 2018 (2. udgave), Institut for Geovidenskab og Naturforvaltning, Københavns Universitet, Frederiksberg. 40 s. ill).

Land use and ownership status: The tenure by type includes approx. private: 430 000 ha and public: 195 000 ha. The total number of forest properties in Denmark is estimated to 28,000. The size of the Danish FMUs range from between 2 to 1,000 hectares. There is limited variation in terms of ownership within the supply base. In Denmark, approx. 74 % of the forest area is owned by private persons or companies, while the remaining 26% is state-owned or owned by the municipalities.

Danish forests are managed as semi-natural for the normal forest management, while for Christmas trees and greenery the areas are intensively managed as plantations. The certified forest area constitutes approx.. 268 000 ha PEFC certified and 215 000 ha FSC certified. Forest management practices are based on the country specific forestry laws, forestry guidelines, and forest management planning practices. Even-aged forestry is the dominant method. The forest rotation period is 60-100 years, containing mostly tending of the young seedling stands, two thinnings, a final harvesting and regeneration of a mature stand. Planting or natural seeding can be used in regeneration. Recently, un-even-aged forestry has become more popular and applied to the extent possible.

The history of Danish forests. Most of Denmark was originally covered by forest, but after centuries of uncontrolled felling and clearance for agriculture, just 2-3% of Denmark was covered by forest around 1800. Since adoption of the Danish Forest Act in 1805, forest clearance has been banned in Denmark, and at the same time great efforts were initiated to plant more forests. The overall area of Danish forests has therefore increased significantly, and it is still increasing. Forests are being planted throughout Denmark, in particular on moorland and sand-dunes in mid and west Jutland.

Socio-economic conditions: The Danish Forest Act regulates forest activity for private forest owners and subsidies are available for forest establishment, conservation of old trees, and establishment of non intervention areas. The Act aims to conserve the existing forest area through legal designation, expand the area through subsidies for new establishment, and aims to promote multi-purpose forestry including wood production, nature conservation, landscape, historical values, environmental protection and recreational interests. Responsibility for forestry activities lies with the Nature Agency. Forests are open to the public for recreational purposes. In Denmark, each year around 4.5 million m³ are felled, while the amount of biomass in Danish forests is growing by an annual net 2.5 million m³ through regeneration and increase in forest cover.

5.3 Detailed description of Supply Base

The BP's supply base is Denmark including Danish forests, windbreaks, scenic areas and urban plantations, mainly in North-Jytland. Skovbygaard is a forest contractor that produces and sells wood chips.

The wood chip production of the BP is 25,000-35,000 tons/year; where 45% of the wood chips are produced mainly from windbreaks and small plantations and in connection with nature projects or open landscape. The supply base also includes clearing of trees and shrubs in connection with developments and expansion of infrastructure in Denmark. From forests, the feedstock from the supply base stems mainly from thinning of conifers, final harvests and branches and tops from both broadleaves and conifers. Approximately 60% of the primary feedstock is conifers, 20% broadleaved and 20% a mixture of broadleaved and conifers.

The feedstock is 100% primary feedstock. The forest type for the whole forest area temperate forests.

The FSC and PEFC certified forest area is distributed on some 265,000 ha certified according to PEFC and 215 000 ha according to FSC; most of this area is certified according to both.

For more information on the supply base of the BP, the BP has elaborated the SBP SBR in Danish and English, which is publicly available on the webpage of the BP (www.skovbygaard.com) after their approval.

5.4 Chain of Custody system

All feedstock sourced is covered by the BPs own wood traceability system, which is recently third party certified according to PEFC Chain of Custody. The BP has valid PEFC COC certificate code SA-PEFC/COC-006227, issued by Soil Association Certification Ltd. on 16-03-2018.

Based on the reviewed purchase documentation from the suppliers and the BPs own sales documentation, claims are/will be transferred correctly to sales documents. This system is applied for SBP as well, since the only processes are chipping, transport, storage and sales of wood chips.

All feedstock is sourced through the PEFC COC system of the company, which covers wood chips as a product group. The scope of the PEFC system is physical separation in all phases with purchase of roundwood or wood chips, chipping, storage, transport and sales of wood chips. Based on the reviewed supplier invoices, claims are transferred correctly to sales documents if inputs are purchased as PEFC certified. This system is

applied for SBP as well, since the same processes are transport, storage, chipping and loading from storage facilities. The BP purchases non-certified roundwood and through the SBE using the approved RRA for Denmark and SVP plus field verification and control measures sells biomass as SBP-compliant biomass to customers holding valid SBP certificate. All non-certified feedstock are kept separate and is traceable during all phases from the forest to the customer. The BP is aware of the SBP claims and batch specific coding system, which is used on the sales invoices and in the DTS database for the monthly transactions. The company maintains annual volume accounts and calculations for all inputs and outputs.

6 Evaluation process

6.1 Timing of evaluation activities

March 2020: Audit planning, document review (location: Home office and DNV GL office, Espoo Finland), performed by the Lead Auditor, Karina Seeberg Kitnaes and DNVGL staff responsible at DNV GL. Duration: ½ person-day of total 1 person-day.

23-24.03.2020: PA2 Remote part of the audit performed by the Lead Auditor Karina Seeberg Kitnæs (*biologist, M.Sc., approved SBP auditor, 24 years of professional international experience with forest biodiversity, forestry, forest industry, certification, Natura 2000 implementation, key biotope mapping from working as senior expert on targeted international projects in Northern, North-eastern and Eastern Europe and many other countries*) and with participation via Skype/Teams with sharing of screen and access to system, telephone and submission of requested documentation and sampling via e-mail by the BP representatives: the CEO and SBP responsible and the COC responsible. Duration: 0,75 person-day document review and 0,25 person-day SBE evaluation.

15.05.2020: Site visits to finalised forest operations and in-forest temporary storages, performed by the Lead Auditor.

Day 1 (remote):

10:00-11:00 Opening meeting: Introduction of participants, roles and confidentiality; Short introduction of the company, SBP audit process overview

Review of open Non-compliances

11:00-14:00 SBP Standard 1: Feedstock compliance, evaluation of SBE, RRA mitigation measures, means of verification, SVP and monitoring.

SBP Standard 2: Verification of feedstock; incl. feedstock data, origin and Supply Base Reports.

Day 2 (remote):

10:00-14:00 SBP Standard 4: Chain of Custody, incl. DTS records.

SBP Standard 5: Collection and Communication of Data; and Instruction Document 5E - requirements review of data and records; SBP Audit Report for Energy and GHG data (SAR), Verification of profile and energy data, monitoring and calculations.

Preliminary closing meeting based on remote audit part.

Day 3 (on-site):

10:00-12:30 Field visits to several harvesting sites, chipping sites, forest projects, storage, crosschecking feedstock compliance, forest of origin, implemented mitigation measures etc.

12:30-13:00 Closing meeting- final.

May-June 2020: Off-site audit with system and procedures review, assessment of corrective actions, reporting, technical review (location: Home office and DNV office, Espoo Finland) performed by the Lead auditor, Technical reviewer and Certification decision maker. Duration: ½ person-day of total 1 person-day.

6.2 Description of evaluation activities

The audit method included: Remote audit part: a) records verification, document and report review and interviews of staff regarding the management system descriptions, calculations and invoicing arrangements at the office and On-site audit part: b) site visit at the forest of origin, mobile chipping and storage facility.

The Periodic Surveillance Audit 2 contained:

- Review of all relevant data and records related to SBP Std. 1 on feedstock compliance, including SBE, SVP, RRA and implemented risk mitigation measures bringing risk to low risk for all indicators.
- Review of all relevant data and records related to SBP Std. 2 on verification of feedstock, including calculation verifications, control of data on origin crosschecked with supply base and review of supply base reports in English and Danish. Completion of DNVGL checklist for std. 2.
- Review of all relevant data and records related to SBP Std. 4 on Chain of Custody, including volume calculation verification, classification and crosscheck with DTS database records
- Review of all relevant data and records related to SBP Std. 5 on collection and communication of GHG data and review and verification of data recorded and reported in the SAR for wood chips with mobile chipping including transport from forests to end-points.
- Site inspection of harvesting sites/mobile chipping sites, forests of origin, and of in-forest storage of wood chips with tracking of timber batches and measurement and classification of feedstock.

Critical control points included verification of forest of origin, implementation of risk mitigation measures in accordance with the RRA for Denmark, feedstock classification and category (SBP-compliant biomass; PEFC certified) within the defined supply base and checking the chain-of-custody volume accounting and supplier documentation thoroughly against DTS recordings, as well as the data and records available as specified in SBP std. 5 and the Instruction note 5E on collection and communication of data and the resulting SAR report for mobile chipping in correct format.

The Periodic Surveillance Audit 2 resulted in closure of two nonconformities and three observations, while no new non-conformities were identified.

6.3 Process for consultation with stakeholders

No stakeholder consultation conducted at annual surveillances.

7 Results

7.1 Main strengths and weaknesses

As the main strengths of the BP, there is proven long-term experience of trading and forest management in the management team.

During the review and evaluation of the BP' SBE with using the SBP-endorsed RRA for Denmark and the SVP, the strengths of the BP include the clear track of feedstock to origin and its flows from the forest to the energy sector, the full overview of suppliers, the use of the SBP approved RRA for Denmark with identification of four indicators with specified risk. The BP has clear SVP risk mitigation measures to get these four specified risk indicators categorised to low risk, including the screening and monitoring of suppliers and their forests and the system setup, procedures, field verification, control and monitoring of forest operations.

The audits did not identify any significant weaknesses.

7.2 Rigour of Supply Base Evaluation

The BP has used the SBP endorsed RRA for Denmark and by using this conducted a rigorous Supply Base Evaluation of the defined Supply Base. For the SBP endorsed risk assessment (RRA), the risk was designated low for all indicators of the SBP Standard 1 apart from four: 2.1.1, 2.1.2, 2.2.3 and 2.2.4.

The BP has built the developed mitigation measures for these four indicators into its procedures and feedstock sourcing programmes and has sufficient knowledge and procedures in place to demonstrate also low risk in practise for all indicators. For the four indicators with specified risk in the RRA, the BP has implements clear risk mitigation measures, including supplier screening (all similar suppliers being forest owners or land owners) in their SVP, and screening procedures for the forest site before harvest operations, routines for field verification, recording and control and monitoring mechanisms of the forest operations conducted.

The evaluation found that the mitigation measures are sufficient to bring the risk down to low for the four indicators.

7.3 Collection and Communication of Data

Since the scope of the SBP system is limited to purchase of feedstock, chipping, storage and transport and as the feedstock originates from primary feedstock with detailed records on forest of origin of all feedstock, the GHG profiling data can be obtained through a quite simple routine and by use of reference values (BioGrace). The baseline and general procedures are in line with the Document 5E requirements and procedures. The BP has prepared and maintained data for the SAR report for Woodchips with mobile chipping (SAR) v2.0.

7.4 Competency of involved personnel

The BP has one active owner and one project manager with full control of all feedstock related and biomass related procedures and routines, as well as one bookkeeper with full control of all records relevant for the purchase and sales documents and volume control.

The personnel responsible for the management and control system has long-term professional experience of management and control of forest operations and the traceability of the feedstock flow from the forest to the customer.

The knowledge and experience of the responsible personnel relating to GHG data profiling procedures is also found to be on a suitable level given the level and limited extend of the SBP scope.

7.5 Stakeholder feedback

No stakeholder comments received.

7.6 Preconditions

None.

8 Review of Company's Risk Assessments

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

The BP has used the SBP endorsed RRA for Denmark with low risk in all indicators apart from four indicators with specified risk (2.1.1, 2.1.2, 2.2.3 and 2.2.4).

The lead auditor reviewed the RRA and the related documentation maintained by the BP and audited the BP up against the SBP Std. 1 to confirm any sensitive or missing elements to the BP's approach for using the RRA and to review if the BP has sufficient knowledge and documentation in place as verification and/or had implemented sufficient mitigation measures leading to confirming low risk in the four specified risk indicators.

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 four indicators with specified risk in the SBP endorsed RRA for Denmark are:

2.1.1 The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped.

2.1.2 The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.

2.2.3 The BP has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).

2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).

For this purpose, the BP has developed appropriate and clear systems and procedures as risk mitigation measures to ensure also these four indicators can be categorised as low risk. The four specified risk indicators are all related to appropriate control systems and procedures to identify, address potential threats and avoid damage to nature values during forest operations. These four indicators can thus be tackled by the same set of SVP and risk mitigation measures.

The BP has setup the SVP and risk mitigation measures including listing and screening suppliers (forest owners), defining one set of suppliers, and developing tools and screening procedures for checking and verifying that no nature values are damaged as part of the forest operations performed, and monitoring procedures for field verification.

The BP uses the SBP endorsed RRA for Denmark, June 2017. Low risk has been identified for all indicators, apart from four indicators with specified risk: 2.1.1, 2.1.2, 2.2.3, 2.2.4. The specified risk is further only for Primary feedstock from uneven-aged stands or stands of broadleaf species (without green management plan/certification), while there are low risk for primary feedstock from: FSC or PEFC certified forests, forests with a green management plan, thinnings of even-aged conifer stands, thinnings of first generation reforestation forest, and non-forest areas, e.g. nature maintenance projects, windbreaks or residential areas.

To minimise the specified risk for uneven-aged standards or stands of broadleaf species and move it to 'Low Risk', Skovbygaard is working according to its own risk mitigation measures described in the company procedures manual.

General:

- The BP 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. Each job order/project is planned and controlled by the management team.
- Each wood chip project is given a unique case number and address, which is marked in the system, on the work instruction, weighing forms etc.

Screening:

- For all suppliers (forest owners), the BP enters into an agreement with the forest owner about the harvest operation. During the pre-meeting, questions are asked regarding a green management plan or forest certification. If the property is certified or has a green management plan, the map with recorded key biotopes must be provided to the BP.
- The forest area is screened through checking all known data (DM&E's map portal with all available maps and records) from the official databases/portals.

Field control

- The BP physically inspects and assess the areas of all suppliers after the screening and before felling. This means that it is highly certain that the areas are screened correctly.
- The forest area is classified as one of the before mentioned six types. This division is made by the management team, which is familiar with identifying key biotopes according to the Danish methodology.
- If the area is assessed as the forest type with specific risk and Kasper/Joachim has any doubt about the nature values on site, an external assessment from a forester/biologist with local knowledge is contacted and asked to make the assessment.

Map and checklist instructions

- A map and checklist instruction of the harvesting site is prepared to ensure that the machine operator is aware of any protected or valuable nature elements/culture elements/HCVs. The map shows identified areas with HCV.
- To be able to identify HCV areas during work, all machine operators working with wood chip projects must document training in "Maskinfærdsel på Naturnære arealer" (Machine traffic in nature areas).
- 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.

Occasionally, a minor part of the wood chips may be purchased from other forest contractors. The procedure for the purchase of external wood chip is that Skovbygaard handles the purchase of feedstock from subcontractors as if it was its own project. The BP then handles the screening, mapping, risk assessment, field check to minimise risks.

The BP has prepared a monitoring plan by sampling of the suppliers of Roundwood and wood chips respectively, which include clear sampling rules and how to monitor that the required mitigation measures are being implemented, records are being kept and whether the measures were shown to be effective in addressing the identified risks.

The review of the lead auditor included checking forest operation sites, interviewing contractors of the suppliers, checking training programme implemented and checking the information and examples of maps with known nature values, project work instructions, documentation and company evaluation.

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 SBP1-PA1-2019-01	NC Grading: Minor
Standard & Requirement:	SBP STD 2, 9.1
Description of Non-conformance and Related Evidence:	
As part of the SBE, the BP has mitigation measures developed and implemented for the four specified risk indicators in the SBP endorsed RRA for Denmark, June 2017 (2.1.1, 2.1.2, 2.2.3 and 2.2.4). The BP has strong focus on field control of forest sites for HCVs and key biotopes and the measures are implemented for all forest operations. The risk mitigation measures are found clear and sufficient to bring the indicators to low risk. The BP implements these measures for all harvest operations/projects no matter which RRA defined type of forest it is (The Danish RRA operates with 6 types). However, the BP has not clearly described in the SBR that the risk mitigation measures for safeguarding HCFs/Key biotopes are implemented to bring not only the RRA defined type 5 but also the defined type 2 from specified risk to low risk.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Updated description in the SBR and revised SBP procedures manual
Findings for Evaluation of Evidence:	The company has now clearly in the SBR and in the SBP procedures manual described that risk mitigation is required for both forest types 2 and 5, i.e. including when forests are covered by a green management plan for the indicators with high risk.
NC Status:	Closed

NC number SBP2-PA1-2019-02	NC Grading: Minor
Standard & Requirement:	SBP STD 2, 1.4
Description of Non-conformance and Related Evidence:	
The BP has since the Main Assessment purchased approx. 15% primary feedstock from other forest contractors. The BP implements the same risk mitigation measures for this type of feedstock, which are found sufficient to bring down the four specified risk indicators down to low risk. However, the BP has not in writing described this second set of suppliers in neither the BP's own procedures manual nor the updated supply base report.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date

Evidence Provided by Company to close NC:	Updated description in the SBR and revised SBP procedures manual
Findings for Evaluation of Evidence:	The company has now described the two types of suppliers in the procedures manual and in the SBR.
NC Status:	Closed

NC number SBP2-PA1-2019-03	NC Grading: Observation
Standard & Requirement:	SBP STD 2, 12.2
Description of Non-conformance and Related Evidence:	
The BP has template for recording trainings and competences of staff. The two project managers had for instance participated in a workshop on e.g. key biotopes. However, the training log for employees had not been updated since the Main Assessment. Proof of trainings and competences was available in various ways but had just not been added to the training logfile. An observation is raised to remind the BP to keep own records up to date.	
Timeline for Conformance:	Other
Evidence Provided by Company to close NC:	Training records for employees
Findings for Evaluation of Evidence:	The company has kept the training records for each employee up-to-date and has added relevant training courses and competences. The training log file was checked and found in good order during the audit for sampled employees training records
NC Status:	Closed

NC number SBP4-PA1-2019-04	NC Grading: Observation
Standard & Requirement:	SBP STD 4, 5.5.2
Description of Non-conformance and Related Evidence:	
SBP-compliant biomass was written SBP_compliant biomass on sales documentation. During the audit, this was corrected to SBP-compliant biomass by the BP in the system so that it from the audit and onwards will appear correct on sales documentation.	
Timeline for Conformance:	Other
Evidence Provided by Company to close NC:	Examples of sales invoices requested by sampling with correct SBP claims
Findings for Evaluation of Evidence:	The company immediately corrected the invoice format during the previous audit and has since then written correct SBP claim on sales invoices. This was checked for sampled invoices in 2019.
NC Status:	Closed

NC number SBP5-PA1-2019-05	NC Grading: Observation
Standard & Requirement:	SBP STD 5, 4.1.2
Description of Non-conformance and Related Evidence:	
The BP classifies all feedstock correct in system and in recorded data in excel sheet. But on the BP's operation checklist/work instruction, the categories were not fully harmonised with the information recorded in excel and for the SAR. An observation is raised to remind the BP of this mismatch, although the recorded data are correct for each project.	
Timeline for Conformance:	Other

Evidence Provided by Company to close NC:	Examples of completed operation checklist, excel sheet with profiling data of feedstock and SAR report.
Findings for Evaluation of Evidence:	The company has implemented a crosscheck procedure, where the manager checks the recorded data in the excel sheet against the operation checklist, in order to secure that classification of feedstock is correctly reported in the excel sheet with energy and profiling data, which feed data into the SAR report.
NC Status:	Closed

NC number SBP1-IA-2018-01	NC Grading: Minor
Standard & Requirement:	SBP Std 1, 2.1.2; 2.2.3; 2.2.4
Description of Non-conformance and Related Evidence:	
As part of the Supply Base Evaluation, the BP has mitigation measures developed and implemented for the four specified risk indicators in the SBP endorsed RRA for Denmark, June 2017. The risk mitigation measures are found clear and sufficient to bring the indicators to low risk. The BP will mainly receive feedstock from even-aged conifer stands or non-forest areas or certified forests or forests with a green forest management plan. However in the RRA, indicator 2.1.2 (and repeated in 2.2.3, 2.2.4) has specified risk also for Feedstock originating from forest estates with a Green Management plan (specified risk): "2. Feedstock originating from forest estates with a Green Management plan: It is a requirement for receiving subsidies for developing a Green Management plan that HCV areas in the forest are identified and mapped. However, there is no strict requirement that the HCVs are monitored and protected from forest management, and therefore risk is evaluated as SPECIFIED". So although the company has strong focus on field verification and checking forest operation sites for HCVs (see same risk mitigation measures under 2.1.1), the company has not in the written description of the risk mitigation measures showed sufficient specific focus on the concept of key biotopes.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Proof of participation in training workshop on key biotopes; Field visits and interview of the two project managers; revised contractor's manual.
Findings for Evaluation of Evidence:	The project managers at the BP have participated in a training workshop on key biotopes according to the Danish definitions and methodology. The BP has also revised the contractors manual and SBR and included more information about key biotopes. During field visits, the two project managers of the BP showed good knowledge and understanding of key biotopes and how to secure their protection during forest operations.
NC Status:	Closed

NC number SBP1-IA-2018-02	NC Grading: Minor
Standard & Requirement:	SBP Std 1, Instruction Note 1A: 6.1
Description of Non-conformance and Related Evidence:	
The BP has used the SBP endorsed RRA for Denmark, June 2018, but has not included as an annex to the RRA: b) A list of multilateral environmental agreements and ILO Conventions that the country has ratified, relevant to the Standard.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Section 5 in the contractor's manual.

Findings for Evaluation of Evidence:	The BP has in the contractors manual include a chapter 5, which includes lists of multilateral environmental agreements and ILO Conventions that the country has ratified, relevant to the Standard.
NC Status:	Closed

NC number SBP1-IA-2018-03	NC Grading: Minor
Standard & Requirement:	SBP STD 2: 16.3; 18.4; instruction note 2A: 1.7
Description of Non-conformance and Related Evidence:	
<p>The BP has defined and is implementing the risk mitigation measures for the four specified indicators. The BP has defined just one set of suppliers (forest owners), which are screened by own project managers and field verification performed by own project managers. So far, the company has described the system for monitoring and checking implementation of the SVP risk mitigation measures. But the company has not yet implemented any plan to monitor the effectiveness of the mitigation measures at least annually. And so far no results of the monitoring of the implementation of the risk mitigation measures have been recorded in the annual update of the SBR.</p>	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Updated SBR; Internal audit record; interview with the two project managers; Review of performed screenings and completed field checklists for each project.
Findings for Evaluation of Evidence:	The BP has monitored all feedstock sourcing and performed screening and field verification of forests of origin of all primary feedstock purchased. On 5th April 2019, the BP has held an internal audit, with crosschecks and control of implemented mitigation measures since the issue of the certificate. In the updated SBR, the BP has included a short section on the performed monitoring of implemented mitigation measures.
NC Status:	Closed

NC number SBP1-IA-2018-04	NC Grading: Minor
Standard & Requirement:	SBP STD 2; Instruction note 2A: 1.2
Description of Non-conformance and Related Evidence:	
<p>The BP has defined monitoring based on the risk mitigation measures for the four indicators to get them to low risk. The BP has only one set of suppliers: Forest owners being screened by own project managers and harvest sites being screened as well by own project managers by 100% sampling density (i.e. all projects). However, at the time of the audit, the BP had not defined nor described the criteria to be monitored during verification according to supplier characteristics, risk factors and local circumstances.</p>	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Section 40 in the contractor's manual; written agreements; performed screenings and completed field checklists for each project.
Findings for Evaluation of Evidence:	The BP has in the contractors manual include a chapter 40 on supplier characteristics and risk factors. Each year, the BP enters into written

	agreements with approx. 200 suppliers and performs always screening and field verification to bring down the risks.
NC Status:	Closed

NC number SBP1-IA-2018-05	NC Grading: Observation
Standard & Requirement:	SBP STD 4: 5.4.1
Description of Non-conformance and Related Evidence:	
The BP has not yet supplied biomass with a SBP claim and not recorded all the requested information in the system yet. But the BP has prepared formats for sales documentation with correct SBP-compliant biomass claim and position for including the SBP certificate code. The BP is recording for sales: a) The name and address of the buyer; b) The date on which the invoice was issued; c) Description of the product, and d) The quantity of the products sold. Example of format prepared to include: Production Batch ID, SBP claim and SBP certificate code illustrated (ID no. 103305; ID no. 103418) . An observation is issued to remind the BP securing correct information on: Specific batch data, SBP certificate code and SBP claim.	
Timeline for Conformance:	Other
Evidence Provided by Company to close NC:	Examples of sales documentation and records reviewed
Findings for Evaluation of Evidence:	Since the receipt of the SBP certificate, the BP has included correct information on sales documentation and recorded correct information: correct information on: Specific batch data, SBP certificate code and SBP claim. Examples of sales documentation and records reviewed and found in good order.
NC Status:	Closed

NC number SBP1-IA-2018-06	NC Grading: Observation
Standard & Requirement:	SBP STD 5; Instruction note 5A: 4.1-4.4
Description of Non-conformance and Related Evidence:	
The BP is aware of the DTS system, but has not done any transactions yet in the DTS system. This observation is to remind that all SBP transactions shall be recorded in the DTS.	
Timeline for Conformance:	Other
Evidence Provided by Company to close NC:	DTS review
Findings for Evaluation of Evidence:	The BP has since the first batch transfer after the receipt of the SBP certificate recorded all SBP transactions in the DTS. DTS checked and crosschecked with the records and data of the BP.
NC Status:	Closed

NC number SBP1-IA-2018-07	NC Grading: Minor
Standard & Requirement:	SBP STD 5; Instruction note 5B: 2.1.2-2.1.3
Description of Non-conformance and Related Evidence:	

The BP has started setting up the data recordings for real data to be reported annually in the SAR report. Documents and records reviewed. However, the system for data recording for SAR data is not yet implemented, while the BP is expected to operate a management system to ensure that data for the annual SAR is recorded consistently and in compliance with the requirements specified in the Instruction Document 5B.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Excel sheet "flisskema", data records and corresponding documentation; SAR report
Findings for Evaluation of Evidence:	The BP has recorded all relevant data in an excel sheet called "flisskema" for each implemented project/batch/transaction. Data supported by documented information and data recorded. The data in the SAR for 2018 are based on the real recorded data on e.g. truck loads, driven km, diesel consumption for mobile chipper, tons weighed at weighing station, moisture content etc. During the audit, the data and the calculations for the SAR were checked.
NC Status:	Closed

NC number SBP1-IA-2018-08	NC Grading: Minor
Standard & Requirement:	SBP STD 5; Instruction note 5B: 6.2
Description of Non-conformance and Related Evidence:	
The BP has inputs transported from forest sites and outputs delivered at the customers, plus to the storage where feedstock occasionally will arrive next to the office. The BP maintains a data sheet to calculate and record data of inputs and outputs. However, so far there has been no sales of SBP-Compliant Biomass and the BP has not provided an annual overview of the quantities (inputs and outputs) of biomass handled at the storage and for each of the scope end-points.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Annual volume summary/overview of quantities (inputs and outputs), DTS and data records with corresponding documentation.
Findings for Evaluation of Evidence:	The BP has maintained clear annual overview of quantities (inputs and outputs) handled at the storage and for each of the scope end-points. Excel sheet inspected, crosschecked with the records in the DTS and all found in good order.
NC Status:	Closed

NC number SBP1-IA-2018-09	NC Grading: Minor
Standard & Requirement:	SBP Std 5, Instruction Note 5C: 2.1.1-2.1.2
Description of Non-conformance and Related Evidence:	
The BP has started setting up the data recordings for real data to be reported annually in the ID5C SBP Static Biomass Profiling data sheet. Documents and records reviewed. However, the system for data recording for SAR data is not yet implemented, while the BP is expected to operate a management system to ensure that data for the annual static profiling data sheet is recorded consistently and in compliance with the requirements specified in the Instruction Document 5C.	

Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	Excel sheet "flisskema", data records and corresponding documentation; static biomass profiling data sheet.
Findings for Evaluation of Evidence:	The BP has recorded all relevant data in an excel sheet called "flisskema" for each implemented project/batch/transaction. Data supported by documented information and data recorded. The data in the static biomass profiling data sheet for 2018 are based on the real recorded data on the feedstock classification recorded for each project in system etc. During the audit, the data and the calculations for the profiling data sheet were checked.
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):	Kimmo Haarala
Date of decision:	15/May/2020
Other comments:	Based on the assessment process, it has been shown that the management system implemented by the BP meets the requirements of the applicable SBP standards and the certificate remains valid.