



NEPCon Evaluation of EHJ Energi 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

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1 Overview

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Certified Supply Base:	Supply Base covers Denmark, Norway, Germany, Poland, Estonia, Latvia
SBP Certificate Code:	<i>SBP-07-06</i>
Date of certificate issue:	02/Nov/2018
Date of certificate expiry:	01/Nov/2023

This report relates to the Second Surveillance Audit

2 Scope of the evaluation and SBP certificate

Scope of this evaluation is based on SBP standards 1; 2; 4; and 5. The geographical scope of the Supply Base was confirmed to be Denmark, Norway, Germany, Poland, Estonia and Latvia.

The risk evaluation and mitigating measures in the Supply Base Evaluation are only applicable to Denmark, since only PEFC or FSC certified feedstock is purchased from Norway, Germany, Poland, Estonia and Latvia. The BP only sources Primary Feedstock.

The BP implements a PEFC CoC system under the Physical Separation method and has defined endpoints at three power plants in Denmark.

Scope description: "Production of woodchips for use in energy production, storage and sale at different energy producers in Denmark. The scope includes supply base evaluation for primary feedstock from 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 certification. The scope of this evaluation also includes the Supply Base Evaluation applied to feedstock from Denmark, and the implementation of required mitigation measures for sourcing of feedstock under the SBE in Denmark.

The scope of the evaluation covered:

- Review of the BP's management procedures;
- Review of PEFC system control points, analysis of the existing PEFC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients;
- GHG data collection analysis.
- Evaluation of mitigation measures implemented

4 SBP Standards utilised

4.1 SBP Standards utilised

Please select all SBP Standards used during this evaluation. All Standards can be accessed and downloaded from <https://sbp-cert.org/documents/standards-documents/standards>

- SBP Framework Standard 1: Feedstock Compliance Standard (Version 1.0, 26 March 2015)
- SBP Framework Standard 2: Verification of SBP-compliant Feedstock (Version 1.0, 26 March 2015)
- SBP Framework Standard 4: Chain of Custody (Version 1.0, 26 March 2015)
- SBP Framework Standard 5: Collection and Communication of Data (Version 1.0, 26 March 2015)

4.2 SBP-endorsed Regional Risk Assessment

The BP has used the SBP-endorsed Regional Risk Assessment for Denmark, which is available for download at: <https://sbp-cert.org/documents/standards-documents/risk-assessments/denmark/>

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

EHJ Energi A/S is a Danish limited liability company based in Randers, Denmark. EHJ Energi A/S wood chip producer and trucking company and produces wood chips for a number of Danish customers. The company has significant activities as a contractor; the activities evaluated during this annual surveillance audit only pertain the wood chips produced under the company's legal ownership and for which the company makes SBP claims.

The Biomass Produced is used for environmentally friendly electricity and heat production at districts heating and combined heat and power plants or at production companies.

EHJ Energi A/S produces the wood chips with its own mobile wood chippers in Denmark. The feedstock from the Denmark part of the supply base comes from wood chips projects in forests and non-forest areas. In addition, wood material is purchased from a limited number of permanent partners in Denmark.

EHJ Energi A/S has previously also sourced certified sustainable wood chips from Poland, and will potentially also source SBP feedstock in form of certified fuel wood logs or wood chips in Norway, Germany, Estonia and Latvia, but has not sourced any SBP feedstock from these countries in the reporting period. Wood from Norway is sourced as SBP-compliant biomass (BP acting as a trader downstream of the biomass production process), while feedstock from Germany, Poland, Estonia and Latvia is purchased as PEFC or FSC certified. This feedstock can be sourced directly from the certified forest or through PEFC or FSC Chain of Custody companies. Since only PEFC or FSC certified material is sourced; the SBE is only applied for feedstock sourced from Denmark.

5.2 Description of Company's Supply Base

The following description of the company's Supply Base has been retrieved from the Supply Base Report, which is available for download from the company's website at: <http://ehj-energi.dk/om-os/>

EHJ Energi A/S is a Danish owned company with headquarters in Hadsten. EHJ Energi A/S produces biomass for a number of Danish energy companies. Biomass is used for eco-friendly power and heat for energy supply companies or manufacturing companies.

EHJ Energi A/S produces wood chips with own machines in Denmark. The wood material comes from own jobs in forests and open land. Furthermore, wood material is purchased from a limited number of regular business partners in Denmark.

EHJ Energi purchases wood in the countries of Norway, Germany, Poland, Estonia and Latvia. Wood from Norway is SBP-compliant Primary, wood from Germany, Poland, Estonia and Latvia is purchased as PEFC or FSC certified. This can take place directly in the forest or through PEFC or FSC Chain of Custody companies.

General description of Danish forests and forestry

There are approx. 620,000 hectares of forest in Denmark, corresponding to approx. 14.4% of the 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 connected to the continuously increasing forest area and probably a larger amount of standing timber per hectare.

There are generally many different wood species in Danish forests, the most common ones 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% of the total wooded area whereas conifers make up 49%. 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.

The estimated total number of forest estates in Denmark is 24,000. 89% of the total number of forest estates has 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. The Danish Forest Association is the Danish industry 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.

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

General description of Danish windbreaks

There is a major tradition of planting windbreaks in Denmark. The systematic planting of windbreaks started in the 1930s. In 1967, the first major windbreak planting guilds were established, and they started planting mainly 3 row and 6 row windbreaks consisting of broadleaves. 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.

Protected species and areas

Denmark has a national plan for fauna protection, nature protection and improvement of biodiversity.

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.

All lakes above 100 m², moors, heaths, meadows, alkaline fens and common pastures above 2500 m² are protected in accordance with section 3 of the Danish Nature Protection Act. The international nature protection in Denmark includes 252 Natura 2000 areas as well as 4 national parks.

General description of Norwegian forests and forestry

There are approx. 12,830,000 hectares of forest in Norway, corresponding to approx. 37% of the total area. The 8,440,000 hectares are productive forest. This area is expected to increase over time. Total standing timber in Norwegian forests is 942 million m³.

The standing timber in the forests has increased significantly for the last 40 years. This is connected to the continuously increasing forest area and a larger amount of standing timber per hectare. The annual growth is approx. 26 million m³, and about 10 million m³ are felled.

Norwegian forests are dominated by the wood species Scots pine, Norway spruce and birch. These are also the wood species that are used in the production of biomass.

Protected species and areas

None of the wood species used for the production of biomass belong to the CITES or IUCN species.

Protected nature and forest areas in Norway, protected in accordance with the Norwegian Nature Protection Act.

- National parks: 29. Total area: 27,756,000 ha.
- Landscape protection areas: 174. Total area: 15,093,000 ha.
- Nature reserves: 1,790. Total area: 4,193,000 ha.
- Nature monuments: 103. Total area: 2,000 ha.
- Other protection areas: 118. Total area: 126,000 ha.
- Total: 47,170,000 ha ~ 10.5%

General description of Polish forests and forestry

The forests cover 8.6 million ha, almost 30% of Poland, approx. 9.3 million/ha, and are dominated by conifers, mainly Scots pine (*Pinus sylvestris*). An increase in the country's forest areas has been planned. Afforestation efforts in Poland are responsible for the national afforestation program, of which the most important goal is to increase forest areas. In accordance with the goals of the national policy for forests, forest areas in Poland are to be increased to 30 % in 2020 and 33 % in 2050.

Forestry's contribution to the gross domestic product (GDP) is rather low (0.4 %), but this does not include the value of the forests' environmental and socio-economic contribution.

Public forests constitute more than 80% of the total number, the majority are state forests.

Since 1990, the amount of timber delivered to the market has more than doubled to 36 million m³ without damaging the forests, which are protected through relatively strict legislation. The Act on Forests, which was

adopted by parliament in 1991, acknowledged that the forests' environmental and social role is just as important as a supplier's harvest of raw materials for industry. In 1997, the act was expanded further with a view to protecting the environment. At the moment, only approx. 61% of the growth is harvested.

Protected species and areas

In 1993, protected forests constituted 47% of the total state forest area. There were 20 national parks, 100 nature reserves, 100 landscape parks and 263 protected landscape areas, constituting an impressive network of protected forest areas.

- National parks: 20
- Landscape protection areas: 100.
- Nature reserves: 100
- Other protection areas: 263.
- Total: 3,360,000 ha ~ 36.1%

General description of German forests and forestry

About 11.4 million hectares, corresponding to approx. 33% of the total land area in Germany, are covered by forest. The share of forest coverage varies a lot regionally, from 11% in Schleswig-Holstein to more than 42% in Rheinland-Pfalz and Hesse, the most forest covered federal provinces. The forest area has increased by more than 1 million hectares in Germany during the last five decades. The wood mass in Germany accounts for 336 m³ per hectare, with an annual growth of approx. 76 million m³. Approx. 50 million m³ is felled per year. German forests currently consist of 60% coniferous forests and about 40% deciduous forests. Norway spruce constitutes the largest share among the wood species (28%), followed by pine (23%), beech (15%) and oak (10%). 48% of the 11.4 million hectares of forest in Germany consists of private forests. 29% of the forests are owned by the state, 19% are owned by municipalities and 4% are owned by the counties.

Privately owned forests in Germany are mainly small and fragmented. About half the private forest properties are smaller than 20 hectares. Only 13% of the private forests have a size of more than 1,000 hectares. The number of private forest owners in Germany is approx. 2 million. State and municipal forests are often large uninterrupted forest areas. A large part of German forests are PEFC and/or FSC certified.

Protected species and areas

Several types of protected areas have been designated in Germany. The various types are defined in Germany's nature protection act (BNatSchG). They can be classified according to size, protection purpose and conservation goal and the resulting limitations for land use. The main types are nature protection areas, national parks, biosphere reservations, landscape protection areas, nature parks and Natura 2000 localities. Two or more protected areas of different types can overlap or even cover the same area. For example, many nature protection areas are also designated as Natura 2000 areas, and large areas of the national parks are designated as landscape protection areas.

National parks, biosphere reservations and nature parks are also known collectively as large preservation areas because of their size.

The German Nature Protection Act from 2002 created a new legal requirement for the federal provinces to create a network of interconnected biotopes covering at least 10% of their area (section 21 of the act). The

network goals constitute an efficient contribution to the protection of biodiversity and the preservation of Germany's natural heritage. The areas that constitute the network must be protected by law by giving them status of a protected area, primarily as nature protection areas, national parks, biosphere reserves or Natura 2000 localities.

- National parks: 16 – 1,047,859 ha
- Biosphere reserves: 17 – 1,994,273 ha
- Nature parks: 103 – 9,900,000 ha
- Other protection areas: 8598 – 223,000 ha

General description of Estonian forests and forestry

Forests in Estonia cover almost half (48.7%) of the Estonian land area. The general characteristics of the forests have been stable for the last ten years. In 2013, the total forest area was 2.3 million hectares, and the total standing timber was 478 million m³. The most common wood species are pine (33.1% of the total area); birch (31.3%), fir (16.2%) and grey alder (9.1%). Around 35,000 people work in the forestry sector, and there are many indirectly related workplaces (within transport, tourism, sports and other sectors).

The Estonian forestry development program up until 2020 is the framework document for the development of forestry in the current decade. The most important goal is to protect the forests' productivity and sustainability and to ensure a varied and efficient use of the forests. Estonia has an annual increase in standing timber per hectare of 5.7 m³ annually including broadleaves. The state holds at least 10% of the forest area under strict protection in order to increase the diversity in protected forests. The main users of wood in Estonia are sawmills and the paper industry. The companies Stora Enso, Metsaliitto Eesti, Lemeks and Holmen Mets purchase almost 80% of the total amount. Felling is carried out for the purpose of delivering wood to the paper industry in Estonia and pulp for their paper factories in Finland and Sweden.

In 2000-2007, the felling volume decreased by approx. 60%, until it reached 5.3 million m³ in 2007. The felling volume started to increase gradually in 2008, where a total of 5.9 million m³ of forest were felled. In 2010, the felling volume was 8.5 million m³, after which it has decreased again, and it is now approx. 7.4 million m³ per year.

The relatively large share of mature standing timber in the Estonian forests will make higher felling volumes possible. The "Estonian forest development program up until 2010" specified 13.1 million m³ as the optimal amount, while the optimal sustainable harvest level in this decade is 12-15 million m³ per year. Which is significantly higher than the actual felling of approx. 7.4 million m³.

Protected species and areas

In order to preserve naturally diverse landscapes and nature types, 22% of Estonia's territory (incl. territorial waters) is protected. The share of strictly protected forests out of the total forest area was 10% in 2010.

- 5 national parks,
- 148 nature preservation areas,
- 152 nature protection areas,
- 96 areas protected under the old protection rules,
- 538 parks and forests,
- 343 special protection areas,

- 1,357 species for protection of nature types,
- 20 nature protected areas at municipal level and
- 1,228 specially protected nature objects.

The total Natura 2000 areas cover 11,320 km² in Estonia. 66 special protection areas (SPA) in accordance with the Birds Directive (2009 / 147EC), a total of 12,590 km². The Habitats Directive (92/43/EF) and localities of Community interest amount to 11,320 km², both areas comprise private forest and state forest (866 km² and 3,539 km² respectively)

IUCN and Red List Estonia have formally decided on a red list classification of species in accordance with the criteria from the International Union for Conservation of Nature (IUCN). Furthermore, 568 protected plant, animal, fungus and lichen species have been included in the national red list of threatened species. 2,228 protected areas have an IUCN category. The IUCN has defined six protected land management categories based on primary management goals. Forests as a habitat have a large share of threatened species. Forestry activities are considered a threat against threatened species.

General description of Latvian forests and forestry

Forests in Latvia cover 3,020,575 ha or 50% of the total area. Compared to other European countries, Latvia is among the ones with the most forest (forests in Europe cover 33% of the land surface on average). State forests in Latvia cover 1,495,136 ha (49.5% of the total forest area), while private forests cover an area of 1,525,439 ha (50.5% of the total forest areas). State forests are managed by the state enterprise AS Latvijas Valsts Meži (LVM). According to statistics, the total forest area in Latvia is increasing.

The dominating wood species in Latvia are Scots pine, birch and Norway spruce. Grey alder, aspen and black alder also cover significant parts of the land. The other wood species that exist in Latvia grow in relatively small areas.

There are 144,000 private forest owners, who own 35% of the forest area. 14% of the forests are owned by legal entities, a total of 49%. The rest is owned by the state (49%) and municipalities (2%). The forest industry accounts for approx. 20% of the Latvian industry's turnover and employs approx. 5% of the total workforce in the country. 70-80% of the wood products are exported, which affects the Latvian international trade balance positively.

In Latvia, there is an objective of all forests being managed sustainably. The main criteria are the following: prevention of the reduction of forest area, protection and improvement of productivity and value of forests; afforestation of non-agricultural areas. Furthermore, Latvia's forests comply with the sustainable forest management criteria determined in the FRA 2010 guidelines. In Latvia, all state forests are certified. The certification process continues in private forests. All forests where forestry activities take place have a working plan. Legislation and regulations contain strict demands for forest management. Supervision is carried out by the state forest service. Protected areas have safe boundaries and management requirements are stipulated in legislation and rules.

Protected species and areas

In Latvia, there is a total of 683 specially protected nature areas regulated by law or regulations from the government regarding specially protected nature areas.

4 nature reserves: Nature reserves are areas unaffected by human activities or almost natural, where unhindered development of natural processes are to be ensured in order to protect and study rare or typical

ecosystems and parts thereof. Strict nature reserves must have areas where all natural resources are excluded entirely from financial and other activities.

1 biosphere reserve: A biosphere reserve is a large area where landscapes and ecosystems of international significance are located. The purpose of establishing biosphere reserves is to ensure the preservation of the natural diversity and to promote a sustainable social and financial development of the territory.

9 protected landscape areas: Landscape areas are areas that are significant because of their original and diverse landscapes and special beauty. The objectives of such areas are to protect and preserve the cultural environment and landscapes that are characteristic of Latvia in all their diversity as well as to ensure the preservation of an environment suitable for society's recreational activities and tourism as well as the use of environmental management methods. Nature reserves are nature areas that have only been changed a little or changed to a varying degree by human activities and which contain habitats of specially protected wild plant and animal species and specially protected biotopes.

4 national parks: National parks are large areas that are characterised by unique natural formations of a national significance, landscapes and cultural heritage landscapes unaffected by human activities or almost natural, a diversity of biotopes, cultural and historical monuments, and special cultural surroundings.

352 protected areas have an IUCN category. The IUCN has defined six protected land management categories based on primary management goals. Species that are considered threatened at a European level and exist in Latvia mainly exist in wetlands, forests and pasture land. Habitat loss, fragmentation and deterioration are the main threats at a European level for species that occur in Latvia. For freshwater species, large threats include water pollution caused by discharge from agriculture and forestry, changes in natural systems and expansion and intensification of agriculture. Other large threats come from logging and wood harvest and urban and tourism development.

Description of the supply base in Denmark

EHJ Energi A/S' supply base consists of Danish forests, windbreaks, nature areas and urban plantations. The supply base covers all of Denmark, but mainly Jutland.



Figure 1 Supply base Denmark

EHJ Energi A/S is a forest contractor that produces and sells wood chips. The wood chip production amounts to approx. 80,000 - 150,000 tonnes per year, approx. 50% of the wood chips are produced in areas

outside of forests, mainly in windbreaks and smaller 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 final felling while the rest is branches and tops from both broadleaves and conifers.

Description of the supply base in Norway

EHJ Energi A/S' supply base in Norway only consists of Norwegian forests. Mainly from the area around the port city Tofte. Wood and wood chips are purchased as SBP certified.

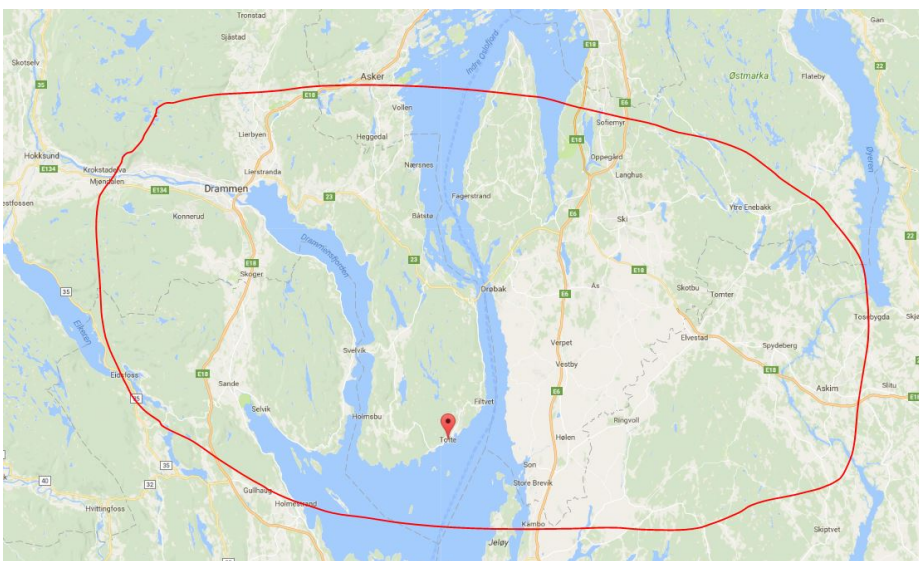


Figure 2 Supply base Norway

Description of the supply base in Poland

EHJ Energi A/S' supply base in Poland only consists of Polish forests. Mainly from the area south-west of the port city Gdansk. Wood and wood chips are purchased as PEFC certified, the location of the forest is known for each consignment. Trade with Polish wood and wood chips is expected to start in the middle of 2018.

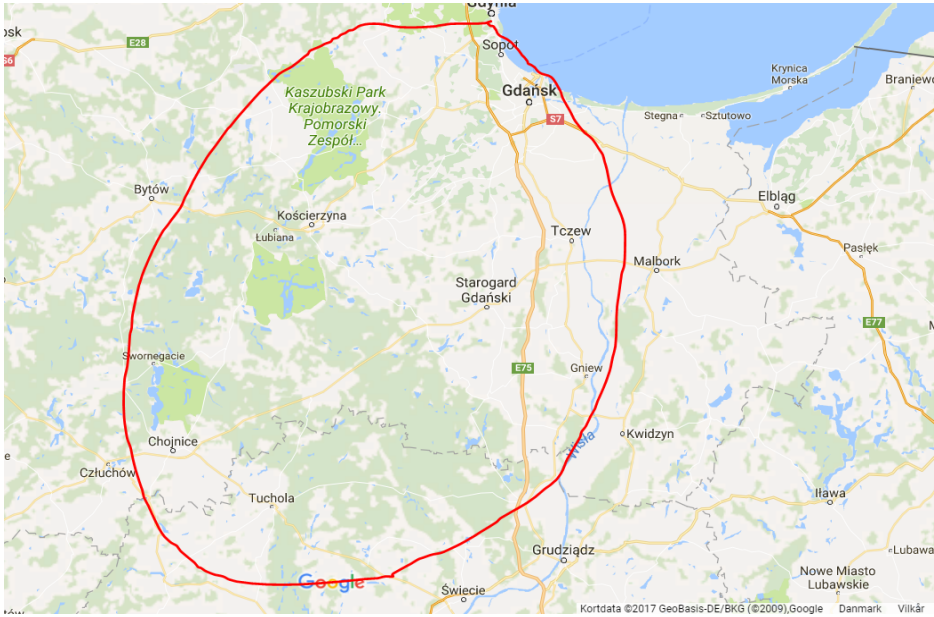


Figure 3 Supply base Poland

Description of the supply base in Germany

EHJ Energi A/S’ supply base in Germany only comes from German PEFC certified forests. Mainly from the north-east part of Germany, in the regions of Schleswig-Holstein and Mecklenburg-Vorpommern. Wood is purchased as PEFC certified by a PEFC CoC company.

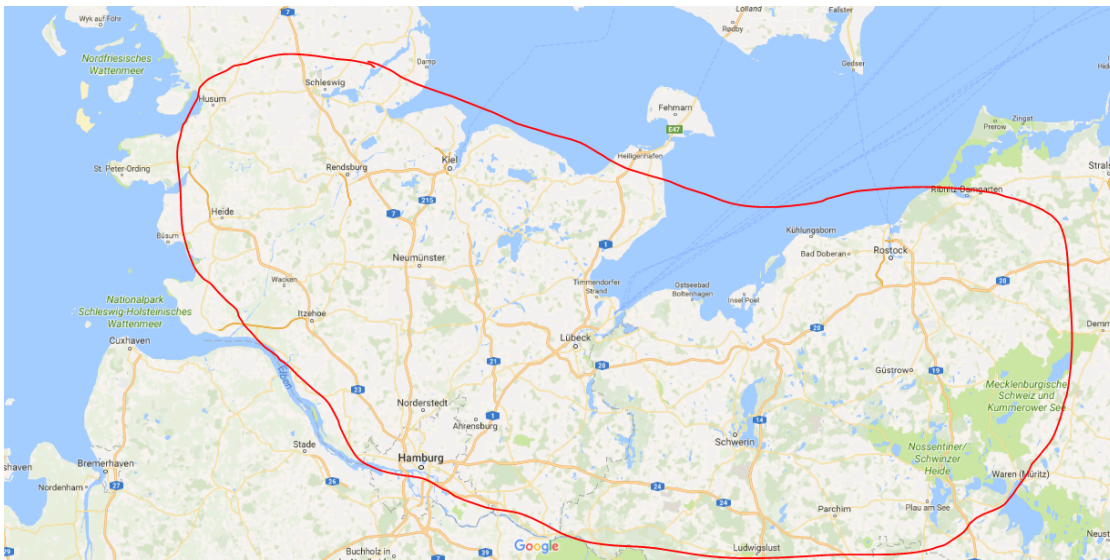


Figure 4 Supply base Germany

Description of the supply base in Estonia

EHJ Energi A/S’ supply base in Estonia only comes from Estonian PEFC/FSC certified forests. Mainly from the northern part of Estonia around the city Tallinn. Wood is purchased as PEFC or FSC certified either

directly from the state forest or from a PEFC/FSC CoC company.



Figure 4 Supply base Estonia

Description of the supply base in Latvia

EHJ Energi A/S’ supply base in Latvia only comes from Latvian PEFC/FSC certified forests. Mainly from the northern part of Latvia around the city Riga. Wood is purchased as PEFC or FSC certified either directly from the state forest or from a PEFC/FSC CoC company.

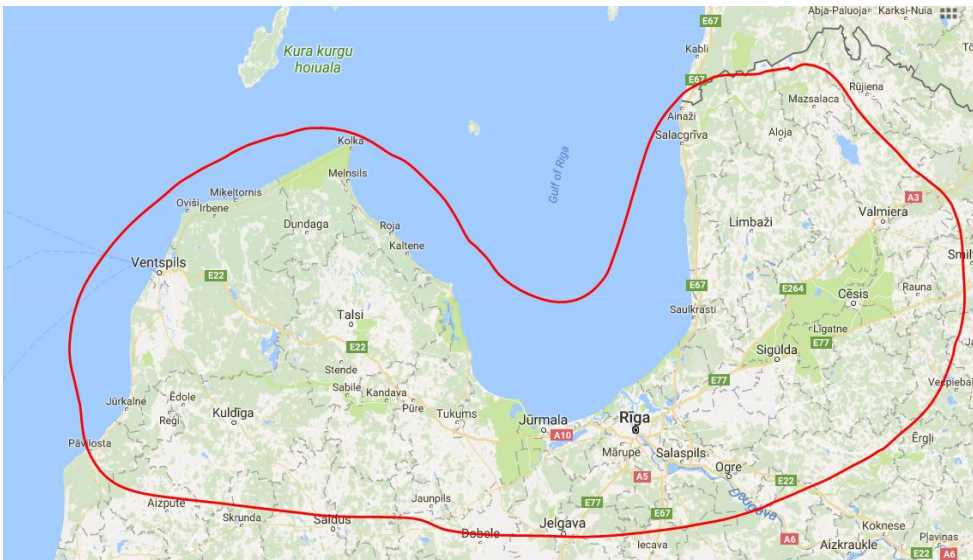


Figure 5 Supply base Latvia

Table 1 Distribution of raw material input in %

	Country	Expected distribution	Conifers	Broadleaves	Mixed

SBP-Compliant primary	Denmark	40%	60%	20%	20%
SBP-Compliant primary	Norway	40%	> 75%	10%	10%
SBP-Compliant primary	Germany	8%	10%	80%	10%
SBP-Compliant primary	Poland	4%	100 %		
SBP-Compliant primary	Estonia	4%	10%	> 75%	10%
SBP-Compliant primary	Latvia	4%	10%	> 75%	10%
SBP-non-compliant					

5.3 Detailed description of Supply Base

The following quantitative description of the company's Supply Base has been retrieved from the Supply Base Report, which is available for download from the company's website at: <http://ehj-energi.dk/om-os/>

Supply base

a. Supply base area (ha): Total area 32.22m ha (Norway 7.2m ha, Denmark 0.48m ha, Poland 8.6m ha, Germany 11.4 m ha, Estonia 1.52m ha, Latvia 3.02 m ha)

b. Ownership (ha): Private ownership

- Norway 80% - 5.76 m ha
- Denmark 65% - 0.31 m ha
- Poland 19% - 1.62 m ha
- Germany 48% - 5.48 m ha
- Estonia 54% - 0.83 m ha
- Latvia 49% - 1.48 m ha

Public ownership

- Norway 20% - 1.44 m ha
- Denmark 35% - 0.17 m ha
- Poland 81% - 6.97 m ha
- Germany 52% - 5.93 m ha
- Estonia 46% - 0.69 m ha
- Latvia 51% - 1.54 m ha

c. Forest type (ha): Temperate

- d. Forestry (ha): Mixed
- e. Certified area distributed on plans (ha):

FSC <https://ic.fsc.org/en/facts-figures>

- Norway: 54 Chain of Custody certificates. 444,828 (ha) certified
- Denmark: 295 Chain of Custody certificates. 212,161 (ha) certified
- Poland: 1613 Chain of Custody certificates. 6,936,469 (ha) certified
- Germany: 2218 Chain of Custody certificates. 1,159,650 (ha) certified
- Estonia: 256 Chain of Custody certificates. 1,428,767 (ha) certified
- Latvia: 318 Chain of Custody certificates. 1,022,196 (ha) certified

PEFC <https://www.scribd.com/doc/147379606/PEFC-Global-Certificates>

- Norway: 75 Chain of Custody certificates. 7,380,750 (ha) certified
- Denmark: 100 Chain of Custody certificates. 264,411 (ha) certified
- Poland: 172 Chain of Custody certificates. 7,252,197 (ha) certified
- Germany: 1708 Chain of Custody certificates. 7,398,828 (ha) certified
- Estonia: 71 Chain of Custody certificates. 1,174,511 (ha) certified
- Latvia: 49 Chain of Custody certificates. 1,700,889 (ha) certified

Feedstock

- f. Total produced quantity: 80,000-150,000 T
- g. Volume of primary feedstock: 80,000-150,000 T
- h. SBP approved certification plans: 6,000-12,000 T

5.4 Chain of Custody system

EHJ Energi A/S is a member of the PEFC CoC group certificate held by industry association Danske Maskinstationer & Entreprenører. This PEFC group certificate is issued by NEPCon Certificering ApS and has the PEFC CoC certificate number NC-PEFC/COC-025953.

The organization implements a PEFC CoC system based on physical segregation. Therefore, SBP claims can only be made for material that is delivered directly from the wood chipper in the forest, or via the storage yards used by the BP, where physical segregation is ensured, and no uncontrolled material (“other biomass”) has been added.

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

6 Evaluation process

6.1 Timing of evaluation activities

The SBP annual surveillance audit 2020 was carried out at the BP main office in Randers, Denmark on June 16, 2020 (office audit), and on June 16 and 17, 2020, visits were carried out at a total of 6 sites where there have been or currently are being sourced feedstock and produced wood chips. Closing meeting was conducted on June 17th. The storage site at the BP Main office address was also inspected.

Total of 3 auditor days were used for this evaluation – 1 day of preparations, 1 day at the BP main office site and 1 day for audits at the forests / stands of origin: 4 sites in Region Midtjylland and 2 sites in Region Syddanmark; please note that the field visits were conducted after consulting the Biomass Producer's records of ongoing and recent wood chip production engagements. The sampling applied was $0,6 \times \sqrt{\text{number}}$ of production sites; this yielded a sample size of 6 sites out of a total of 96 production sites. Two of the current storage locations was also visited, One located at Tyrstinggaard (Mattrup Gods) and the located at the BP main office address. Time used for reporting and administration is not included in these figures.

The SBP annual surveillance audit was conducted in accordance with the plan below. The field visits started and ended in the field, including a summary of the observations from the field visits. A closing meeting was conducted in the afternoon of June 17, 2020. During this meeting the auditor provided a summary of the findings from the field visits, and a formal communication about the result of the audit and NCRs raised was provided to the Head of Administration.

June 16, 2020

Time	Activity	Location
9.00 – 9.30	Opening Meeting. Introduction of participants. Review of the agenda.	EHJ Energi Main office
9.30 – 10.30	Brief presentation of the BP and any changes since last year. <ul style="list-style-type: none"> • Supply Base Report and SBE, and annual update • Documented procedures (Management system), including traceability, legality, health and safety, risk mitigation measures, staff qualifications and competences, Supplier Verification Program, system for complaints handling • Internal audit and management review • Training activities and registration of completed training • Complaints handling • Review of SBP logo usage 	EHJ Energi Main office
10.30 – 12.00	Review of the PEFC CoC traceability system <ul style="list-style-type: none"> • Procedures • Review of documentation: (Projects, maps, purchase invoices) • Review of sales documentation (invoices and DTS) Visit of storage site (located at the same address as the BP office)	
12.00 – 12.30	Break	EHJ Energi

		Main office
12.30 – 14.00	Review of the system for the collection and reporting of energy and emissions data: <ul style="list-style-type: none"> • Reporting period • Transport data • SAR • Static Biomass Profiling Data 	EHJ Energi Main office
14.00 – 14.30	Planning of field verifications <ul style="list-style-type: none"> • Selection for sample of projects • Practical planning 	EHJ Energi Main office
14.30 – 15.00	Preliminary Closing meeting. Auditor summarizes preliminary conclusions. Program for field visits confirmed.	EHJ Energi Main office

June 16 and 17, 2020

Field visits were conducted on the basis of the inventory of ongoing, planned and completed projects. Auditor was responsible for selecting projects for field visits, taking into account the number of projects, as well as the type of project, size and geographical location.

Activity	Location	Auditor(s)	App. Time June 16, 2020
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site: 8361 Hasselager Project ID: 7710	CAR	15.30 - 16:00
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site: 6623 Vorbasse Project ID: 7790	CAR	17.00 - 17:15
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site: 6623 Vorbasse Project ID: 7729	CAR	17.30 – 18.00
Visit to Storage site	Storage site Tyrstinggaard Tyrstingvej 8740 Brædstrup	CAR	18.00 – 18.15
Activity	Location	Auditor(s)	App. Time June 17, 2020
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site: 8970 Havndal Project ID: 7806	CAR	9:00 - 9:30
Evaluation at forest of origin of primary feedstock, evaluation	Supplier site: 8800 Viborg	CAR	10.30 - 11:00

of relevant mitigation measures.	Project ID: 7785		
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site: 8850 Viborg Project ID: 7810	CAR	11.30 - 12:30
Activity	Location	Auditor(s)	App. Time June 17, 2020
Closing meeting: Auditor summarizes audit conclusions. Conclusions and NCR explained.	Main office	CAR	13:30 – 14:00

6.2 Description of evaluation activities

The audit started with an opening meeting on Tuesday, June 16, at 9:00 - 9:30 with attendance from the Head of Administration and main responsible for the BP's CoC and SBP procedures.

The audit review of documented procedures and control systems, and all required documentation. Interviews were conducted with all staff relevant to the critical control points and key responsibilities in relation to the production, storage and sales of the certified products.

The audit also included extensive documents review and check of calculations in regard to the GHG emission data reported by the BP.

The audit continued on Tuesday June 16 and Wednesday June 17, 2020 with field visits to a total of 6 sites where wood chips have been or will be sourced from and produced. The sample size was determined as 0.6 x Square root of the number of wood chip projects under BP legal ownership in the previous 12 months. Note that the BP also work as a contractor for other BPs but does not take legal ownership in these cases. The relevant number of projects was determined via review of project records to be 96 and hence the sample size was 6 sites. The single storage site at the BPs home address was also visited. One additional site had also been in use in the reporting period but was no longer relevant, since there are no stocks and the storage site will no longer be used.

The audit was concluded on Wednesday June 17, with a closing meeting with attendance by the Head of Administration and the Managing Director. During the closing meeting the auditor presented the conclusions of the audit, including the NCRs and a few points for follow-up.

Auditor's analysis of Critical Control Points (CCPs) can be found in Appendix C of this report.

Impartiality commitment: NEPCon commits to using impartial auditors and our clients are encouraged to inform NEPCon management if violations of this are noted. Please see our Impartiality Policy here: <http://www.nepcon.org/impartiality-policy>

Composition of audit team:

Auditor(s), roles	Qualifications
Christian Rahbek, Lead Auditor and Local expert	M.Sc. (Forestry) from University of Copenhagen. Has passed NEPCon Lead Auditor Training for FSC and PEFC FM and CoC certification. Experience from more than 9 years of FSC and PEFC CoC and FM audits in Denmark, Europe, Canada and Brazil. Christian was approved as SBP Lead auditor in January 2017 and has lead a number of SBP assessments and audits in Denmark and Canada.

6.3 Process for consultation with stakeholders

Stakeholder consultation processes were carried out by both the Biomass Producer (BP) and the Certification Body (CB) prior to the 2018 main assessment. One comment was received by the BP, the stakeholder commenting that they disagree in the classification of non-forest areas as being a low risk sub-scope in the SBP Endorsed RRA for Denmark. The BP has chosen to use the risk classification from the SBP Endorsed RRA despite the comment from the stakeholder.

Neither the CB nor the BP had received any comments from stakeholder in the reporting period since the main assessment.

7 Results

7.1 Main strengths and weaknesses

Main strengths: The main strengths of the BP lie in the relatively simple operation, with all administrative tasks being carried out by the Managing Director Esben Hegelund and the Head of Administration Preben Christensen, and the fact that all SBP feedstock under SBE is purchased in forest or stand of origin.

The BP has worked closely with the consultant Claus Danefeldt Clemmensen for the industry association Danske Maskinstationer og Entreprenører (DM&E), who has assisted in creating the Supply Base Report and the documented management system, etc. The BP has an on-going membership with DM&E, and therefore will also have access to support from this source in the future. Furthermore, all interviewed staff had a strong engagement in implementation of SBP system and positive approach.

Weaknesses: The BP has not had in-house staff that are professional foresters, and therefore were reliant on external staff or partners for conducting field visits and identification and mapping of key biotopes prior to starting wood chip production when sourcing from specified risk stands. The BP identified during their internal audit that the field identifications had not been sufficient and has therefore made a contract with Forest and landscape engineer Andreas Bach Rasmussen, who is now in charge of conducting field identification, mapping and protection measures for key biotopes in all project in “specified risk” sub-scopes.

The BP also does not have readily available fuel consumption data for the felling, extraction and chipping of biomass, and therefore for now will instead report default values in accordance with Instruction Document 5E

7.2 Rigour of Supply Base Evaluation

At the time of the assessment, the Supply Base Evaluation was implemented only for primary feedstock sourced from Denmark. The BP will carry out the SBE for primary feedstock (forest products) that are originating from Denmark and is sold without SBP-approved Forest Management Scheme claim, SBP-approved Forest Management partial claim or SBP-approved Chain-of-Custody (CoC) System claim. Risk mitigation measures are implemented for material coming from both forest land and from other origin, e.g. landscape maintenance, or residential areas.

The BP has used the SBP endorsed regional risk assessment for Denmark (June 2017) which has been widely circulated for stakeholder consultation. Based on the “specified risks” in this risk assessment the organization has implemented relevant mitigation measures.

Supply Base Evaluation is not implemented for material sourced from any other country than Denmark.

7.3 Collection and Communication of Data

The BP does not have readily available fuel consumption data for the felling, extraction and chipping of biomass, and therefore the BP has opted to use the accepted Default Values from BioGrace II. Auditor has accepted the justification that actual fuel use records were not readily available. Transport distances are recorded for all truckloads of SBP-compliant biomass delivered using a bespoke smartphone app.

7.4 Competency of involved personnel

The BP has a relatively simple operation, with all administrative tasks being carried out by the Managing Director Esben Hegelund and the Head of Administration Preben Christensen. Both administrative staff showed good awareness of their management system, and of the objectives and restrictions in the SBP system.

The BP has worked closely with the consultant Claus Danefeldt Clemmensen for the industry association Danske Maskinstationer og Entreprenører (also DM&E), who has assisted in creating the Supply Base Report and the documented management system, etc. The BP has an on-going membership with DM&E, and therefore will also have access to support from this source in the future.

Following the BP identification of insufficient processes for field identification and protection of key biotopes, the BP has therefore made a contract with Forest and landscape engineer Andreas Bach Rasmussen, who is now in charge of conducting field identification, mapping and protection measures for key biotopes in all project in “specified risk” sub-scopes. Auditor find that this is a significant improvement of the competences available in the organization.

All involved personal has provided good knowledge in relevant fields, including project management classification to correct sub-scope, and implementation of relevant mitigating measures during the site visits.

The BP has documented qualification requirements for personnel involved in the different aspects of the SBP system, including the qualifications needed for SBE.

According to interviews, review for formal qualifications and the set of procedures and documents that were composed for the SBP system, auditors evaluated the competency of main responsible staff to be sufficient.

7.5 Stakeholder feedback

Stakeholder consultation processes were carried out by both the Biomass Producer (BP) and the Certification Body (CB) prior to the 2018 main assessment. One comment was received by the BP, the stakeholder commenting that they disagree in the classification of non-forest areas as being a low risk sub-scope in the SBP Endorsed RRA for Denmark. The BP has chosen to use the risk classification from the SBP Endorsed RRA despite the comment from the stakeholder.

Neither the CB nor the BP had received any comments from stakeholder in the reporting period.

7.6 Preconditions

There are no open preconditions to the certification.

8 Review of Company's Risk Assessments

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

The BP only implements SBE for feedstock from Denmark; all other feedstock will be sourced with a SBP recognized certification claim. The BP has used the SBP endorsed Regional Risk assessment for Denmark (June 2017) and has recognized all the risk ratings from this document. The BP has established and implemented mitigating measures, with the objective of lowering the final risk rating for all indicators to "low". The BP has not implemented the suggested mitigation measure that the result of the identification and mapping of key biotopes is made publicly available. This is in order to protect the privacy of the landowners. Auditor finds that this is acceptable.

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

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

2.3.1	Low	Low
2.3.2	Low	Low

Table 2. Final risk ratings of Indicators as determined AFTER the SVP and any mitigation measures.

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

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Low	Low
2.4.3	Low	Low
2.5.1	Low	Low
2.5.2	Low	Low
2.6.1	Low	Low
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Low	Low
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low

9 Review of Company's mitigation measures

The BP has defined and implement mitigation measures according to the risks identified in the SBP endorsed Regional Risk Assessment for Denmark (June 2017), which found 4 Indicators with specified risk and suggests mitigating measures. It is important to note that the BP has found during their internal audit, that the previous methodology for field identification, mapping and protection of key biotopes had not been sufficient, and therefore have contracted a forest and landscape engineer to conduct this process at all wood chip projects in specified risk sub-scope areas. As part of their monitoring system, during the field verification audits, some wood chips projects falling in specified-risk sub-scopes were audited. In these cases, it could not be demonstrated that a trained professional had inspected the area for identification and protection of key biotopes. Only in one of the six specified risk wood chip projects selected for the field audits an unidentified key biotope was found (a natural spring), and this had not been disturbed or damaged by the thinning operation and subsequent wood chip production. It is auditor's conclusion that the BP had correctly concluded that their risk mitigation had been too weak, and that the addition of in-house competences (contracting a forest and landscape engineer) is an appropriate step to address this.

The table below shows the specified risk Indicators and the corresponding mitigation methods that the BP is implementing. However, the BP does not implement the suggestion that HCV maps are made publicly available, since this is seen as being invasive of the privacy of the forest owner. The auditor has accepted this conclusion. The reason for this is that it may not be desired by the forest owner. Another reason is that competitors would be able to identify the BP's customers which the BP wish to be confidential. All information is disclosed to the auditor and contain registrations over key biotopes and historical or cultural remnants

The BP has documented and described systematic procedures for implementing the relevant risk mitigating measures according to the sub-scope of the stand of origin. Some forests have a so-called green management plan, which has been produced with a subsidy from the government. The green management plan includes both traditional forest management plan elements and maps, and in most cases also includes maps and management guidelines for key biotopes and sensitive and legally protected areas. For forests with a green management plan, the relevant maps of HCVs will be used, and for Specified risk stands without the necessary identification and mapping of Key Biotopes, an onsite inspection will be carried out by a trained professional with a minimum of a B.Sc. in Forestry or biology, and maps identifying HVCs including key biotopes will be created.

The BP has also implemented documented procedures for protection of biologically valuable dead wood in the forests. The BP has described a short procedure for monitoring the implementation and effectiveness of the planned mitigation measures during annual internal audits.

Indicator

2.1.1 Forests and other areas with high conservation values in the Supply Base are identified and mapped.

Mitigating measure

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 begins of feedstock for biomass production, so that the information about any HCVs can be securely passed on to staff carrying out the felling and chipping operation.

The BP creates a map for all wood chip production areas, and all project are assigned a project ID and a checklist is filled in by the owner-operator. This also includes assigning the project to the correct sub-scope.

1. Primary feedstock from FSC or PEFC certified forests
2. Primary feedstock from forests with a green management plan
3. Primary feedstock from even-aged stands of non-native conifers
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

If the area is in a specified risk sub-scope, it is checked if certification or green management plan maps are available, and if this is the case, these are used. This ensures that natural values, including key biotopes can be respected and protected during felling and extraction. If the area is in a specified risk sub-scope, and no maps of key biotopes is available, procedures state that a local expert must be consulted. The online HNV forest map (Map with indication of prevalence of areas of High Nature Value, which available at <http://miljoegis.mim.dk/cbkort?profile=miljoegis-plangroendk>) is also checked prior to the field survey of HCVs for a calculated indication of the potential for HCVs. If the area is too small to carry the cost of a local expert, the biomass will be classed a "other biomass". If the project area is in a low risk sub-scope, screening is not conducted. Further consideration for all wood chip production areas include consulting maps of legally protected areas, e.g. wetland, marchland, bog, heath or areas of historical, archaeological or any other legal protection status. Procedures are also in place to ensure that any information the owner might have about nesting trees, fox burrows, special local agreements etc. are registered in the project documents.

Indicator

2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.

Mitigating measure

For all wood chip production areas the following material is given to the operator(s):

- Map of project area
- Written instructions from project manager (owner-operator)
- Checklist as per 2.1.1
- Any other relevant information

This, along with easy access to the project responsible (owner-operator) via mobile phone, ensures that any identified element on the maps requiring protection and any other element requiring protection is respected during felling, extraction and wood chip production processes,

Indicator

2.2.3 Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).

Mitigating Measure

Risk mitigation measures are the same as for Indicator 2.1.2:

For all wood chip production areas the following material is given to the operator(s):

- Map of project area

- Written instructions from project manager (owner-operator)
- Checklist as per 2.1.1
- Any other relevant information

This, along with easy access to the project responsible (owner-operator) via mobile phone, ensures that any identified element on the maps requiring protection and any other element requiring protection is respected during felling, extraction and wood chip production processes

Indicator

2.2.4: Biodiversity is protected

Mitigating Measure

The goal of the mitigation measure is to ensure that biodiversity is sufficiently protected. This Indicator is seen as being partially covered by Indicators 2.1.1 and 2.1.2, and as such Low risk will be demonstrated or reached through mitigating measures. Required risk mitigation measures are the same as outlined for Indicators 2.1.1 and 2.1.2.

Due to the technical requirements that the biomass shall fulfil with regards to humidity and density, it is generally not accepted by Energy Producers that decaying wood is used as input in the chips supplied from Danish Forests. The BP has also established procedures for ensuring that biologically valuable dead and decaying and deadwood on the forest floor is not chipped or removed in connection with production and extraction of biomass. The BP has also established procedures for ensuring that a volume of deadwood is left in the forest after final felling, and for preserving standing dead trees in thinning or afforestation areas.

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 03/19	NC Grading: Minor
Standard & Requirement:	SBP Standard 2, Instruction Note 2C, req 2.1
Description of Non-conformance and Related Evidence:	
The BP has made its SBR available for download on its website in both Danish and English versions at: http://ehj-energi.dk/om-os Auditor has verified the links on the website. However, upon inspection of the Danish and English versions of the SBR it was found that the changes regarding update of the sub-scope of "Primary feedstock from thinnings in even-aged coniferous stands" had not been carried over into the English version of the SBR. Since the non-conformity is on a document level, a minor NCR is raised.	
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:	The BP has updated its SBR in the English version, so that the subscope are correctly described, and now only makes a Danish language version of the SBR available upon request. See exhibit 1
Findings for Evaluation of Evidence:	Auditor finds that the update of the SBR has addressed the identified non-conformity. Auditor also finds that it is acceptable for the BP to only maintain an English language version of the SBR, as long as the SBR will be translated to Danish upon request. The NCR is closed upon the above corrective actions taken.
NC Status:	Closed

NC number 01/20	NC Grading: Minor
Standard & Requirement:	SBP Standard #2 Req. 16.1: Where an Indicator is rated as specified Risk, mitigation measures shall be taken to reduce the risk level to Low Risk
Description of Non-conformance and Related Evidence:	

<p>In one case it was found that the BP had sourced biomass from a small area which had been mapped as “dry heath” and designated as protected. The BP could not provide documentation that the local municipal authorities had been contacted prior to felling the trees, as require by the BP’s procedures. During the audit, the contractor responsible for the felling and the respresentative of the organization woith the tenure right was contacted and it became clear that the authorities had not been contracted. The contractor claims not to have been aware or made aware by the BP of the designation as a protected nature type. As this is a singular case identified, a minor NCR is raised.</p>	
<p>Timeline for Conformance:</p>	<p>By the next surveillance audit, but no later than 12 monhts from report finalisation date</p>
<p>Evidence Provided by Company to close NC:</p>	<p>The BP has analysed the non-conformity, and have found the root cause to be a miscommunication with the contractor. The BP has updated and implemented the procedure (exh 2) to always prepare and send the maps and screening documents to the contractors electronically, highlighting any protected areas, and reminding to contact authorities for applicable permissions. This also done to ensure that the communication to the contractors can be clearly documented that and when the contractors have been informed. The BP has reinforced their procedures for review of the project documents, including any required communication with auditorities for the wood chip projects, after felling and extraction and prior to chipping and transport to the end-point. See exhibit 13.</p>
<p>Findings for Evaluation of Evidence:</p>	<p>Auditor finds that the root cause analysis is correct, and that the corrective actions are sufficient to address the identified weakness. Failure by the contractor to meet the required measures will make it possible for the BP to disqualify the feedstock from the specific area. The NCR is closed on this background.</p>
<p>NC Status:</p>	<p>Closed</p>

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:	28/Aug/2020
Other comments:	<i>Click or tap here to enter text.</i>