



NEPCon Evaluation of DSHwood A/S Compliance with the SBP Framework: Public Summary Report

Third Surveillance Audit

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Completed in accordance with the CB Public Summary Report Template Version 1.4

For further information on the SBP Framework and to view the full set of documentation see www.sbp-cert.org

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1 Overview

CB Name and contact:	NEPCon OÜ, Filosoofi 31, 50108 Tartu, Estonia
Primary contact for SBP:	Ondrej Tarabus ot@nepcon.org, +34 605 638 383
Current report completion date:	28/Aug/2020
Report authors:	Christian Rahbek, Lead Auditor
Name of the Company:	DSHwood A/S, Glarmestervej 7, 7000 Fredericia, Denmark
Company contact for SBP:	Erik T. Kjær, email: etk@dshwood.com, mobile: +45 2344 9555
Certified Supply Base:	The certified Supply Base Covers all of Denmark
SBP Certificate Code:	SBP-01-91
Date of certificate issue:	25/Jan/2018
Date of certificate expiry:	24/Jan/2023

This report relates to the Third Surveillance Audit

2 Scope of the evaluation and SBP certificate

Scope description: “Production and trade of woodchips for use in energy production, storage and sale at different energy producers in Denmark. The Supply Base cover Denmark and Germany. A Supply Base Evaluation is only applicable to Denmark; all feedstock sourced in Germany are sourced from FSC or PEFC certified forests.”

3 Specific objective

The specific objective of this evaluation was to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification. The scope of this evaluation also covered the Supply Base Evaluation, and the mitigation measures describing herein.

The scope of the evaluation covered:

- Review of the BP's management procedures;
- Review of PEFC system control points, analysis of the existing PEFC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients;
- GHG data collection analysis.
- Evaluation of Supplier Verification Program
- 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 evaluation is based on the BP's use of the SBE-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

DSHwood A/S is a private limited company lead by Managing Director Rasmus Grønberg Bak. DSHwood is trading logs, lumber and chips from European forests. DSHwood aims to buy the timber directly from the supplier and sell directly to the end user. DSHwood is a dedicated wood trading company and has no ownership in forests, industry or equipment.

DSHwood originates as a trading office as part of the Danish Forest Association – the trade organization of the Danish private forest owners. The trading office was established in 1967 with the purpose of developing export opportunities for Danish wood. In year 2000, the office was reorganized into an independent subsidiary of the Forest Association and renamed DSHwood.

DSHwood A/S holds FSC and PEFC CoC certificates issued by NEPCo and have the PEFC CoC certificate number NC-PEFC/COC-000079 and FSC certificate number NC-COC-011786.

The 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 all of Denmark and Germany. The risk evaluation and required mitigation measures in the Supply Base Evaluation are only applicable to Denmark; all feedstock sourced in Germany are sourced from FSC or PEFC certified forests.

All feedstock is primary feedstock, and is purchased either as standing volume, as fuel wood in stacks in the forest of origin or as fuel wood or chips from other suppliers under a Supplier Verification Program from suppliers working and sourcing within the Supply Base. In all cases the stand of origin is known, and when buying wood chips from other companies, and the BP takes full responsibility for all feedstock classification and risk mitigation measures. The organization also buys wood as PEFC or FSC certified but mainly relies on sourcing feedstock as SBP Compliant under its own Supply Base Evaluation. The organization implements a mitigation measures to ensure correct classification of feedstock and that all necessary mitigating measures are observed in all forests and stands of origin of the supplied feedstock.

The BP is supplying the woodchips from the forest via truck or ship to the customers, which are combined heat and power plants and district heating plants. The organization delivers the vast majority of the biomass directly to the endpoint, but also uses two storage and logistics sites outside of the forests.

5.2 Description of Company's Supply Base

DSHwood defines its Supply Base as all of Denmark and exclusively FSC and / or PEFC certified forest in Germany.

The Danish Forest Area

DSHwood consider all of Denmark as it's Supply Base. DSHwood have app. 150 suppliers which deliver feedstock which either FSC/PEFC certified, which DSHwood mitigate via its SBE or which is controlled feedstock. Denmark has been in DSHwoods Supply Base from its initial SBP certification in 2017. According to Danmarks Statistik (Forest statistics 2017) the Danish forest area measures 625.603 ha, equivalent to 14,6% of the country's total area. Approximately 75% of forest land is owned by private, and the last 25% owned by public organizations.

Denmark

	Ha	%
<i>Total</i>	625.603	100
<i>Private, person</i>	351.019	56
<i>Private, company</i>	79.968	13
<i>Fund or Foundation</i>	29.766	5
<i>State Forest</i>	117.194	19
<i>Other state Forest</i>	8.322	1
<i>Other public</i>	26.671	4
<i>Unknown</i>	12.663	2

Table 1. Distribution of forest area by ownership type (Nord-Larsen et al. 2018)

The total growing stock in the Danish forest is 132 million m³ equivalent to 211 m³/ha. The largest share of the total growing stock is hardwood (58%), while softwood is 42%. From 2000 until today, have the total growing stock in the Danish forests increases significantly. The reasons are both the growing forest area and also a greater growing stock per hectare.

Net growth in the period 2013-2017 was approximately 1,6 million m³ / year. In the same period felling and death by natural causes amounted to 4.8 million m³ / year. The total average annual increase has been 6,3 million m³ / year (Nord-Larsen et al. 2018).

Supply Base

The terrestrial environment of Denmark is divided between two EU biogeographical regions by means of a north-south divide through the middle of the Jutland Peninsula: 1) the Atlantic region, covering the western part of Jutland and the Continental region, and 2) the Continental region covering the eastern part of Jutland and Denmark's islands. These regions are used by the Danish Nature Agency under the Ministry of the Environment and Food to the EU Commission to report on the status and management results of Natura 2000 conservation areas.

In the early 1800's, the forest cover in Denmark is estimated to have been as low as 3-4% of the total land area. Deforestation was caused by logging for timber and firewood and for animal grazing areas. Denmark's first forest legislation came into force in 1805. Its main objective and as wells as following Danish forest acts, have been to maintain the forest covered area and to protect the existing forest from overexploitation, premature felling and grazing by farm animals. In the mid nineteenth century, intensive forest management became widespread and large afforestation projects were carried out. Today approximately 14% (615,000 hectares) of Denmark's land area is covered by various types of forest.

According to the Danish Nation Forest Inventory, conducted by the Danish Nature Agency, 41% of Denmark's forest area is dominated by deciduous trees, 39% by coniferous tree species, 11% by a mixed coniferous and deciduous tree species, 5% are Christmas tree plantation (located within all the above forest types) and 4% of the area is unstocked, e.g., log loading and landing yards, fire prevention areas etc. Furthermore, 67% of the Danish forest area is covered with even-aged planted stands with 9% being even-aged stands from natural regeneration and 6% of the forest area is uneven-aged natural forest. The latter represent pockets forests that would be closest to what is considered of natural forest stands having retained or regained natural forest characteristics; which can be found in forests both under private and public

ownership and they are predominantly located in the Continental region (east Jutland and the isles). The location of these natural forest stands are generally well-known, but some may still be unidentified.

Of Denmark's 615,000 hectares of forest, 440,000 hectares are managed as forest reserves (called 'fredskov' in Danish) governed under the Danish Forest Act. The Forest Act permits forest management activities within these areas; however, Article 8 (see Category 1 for more details) requires the managed area shall maintain continuous forest cover, that a maximum of 10% of the forest area can be used for short rotation Christmas trees or greenery production (e.g., cuttings typically from *Abies procera*), and another maximum of 10% of the area can be used for coppicing or for animal forest grazing. The Forest Act also protects streams and wetlands in forests that are not covered by the Nature Protection Act nor under the Ministry of Environment or local authorities. It stipulates that lakes, bogs, heaths, species-rich grasslands, coastal grasslands and swamps located in "fredskov" forest reserve may not be planted or cultivated, drained or in other way changed. It is also important to note the Forest Act does not include many measures relating to forest techniques, e.g. harvesting, planting or thinning (also see Category 1).

There are 79,000 hectares of forests designated as Natura 2000 areas (13% of the Danish forest area) which have some overlap with the 74,900 hectares' forests and other natural areas designated under the EU Habitat Directive, 51,500 hectares under the EU Birds Directive and 13,900 hectares as Ramsar sites. A harvest permit must be obtained from the Danish Nature Agency to conduct any timber harvesting activities within Natura 2000 forests; permits are given with the proviso that the natural condition of the forest will not deteriorate and issuing permits is more an exception than common practice.

In relation to FSC HCV category 3, it is worth noting that although the Forest Act §25 sets provisions for registering 'especially valuable forests' i.e., valuable in terms of their biodiversity and conservation value, and accompanying appropriate conservation management activities for these areas, these areas have not yet been registered by the Danish Nature Agency. Danish forests biodiversity and conservation values have been surveyed by Department of Geosciences and Natural Resource Management at Copenhagen University through a sampling methodological approach. Therefore, not all forest management areas have been systematically surveyed, particularly small privately forests area.

Forest ownership in Denmark are divided by private forests owners, (70%), State and Municipal owners (24%), trust funds or foundations (4%) and unknown owners (2%).

Biodiversity in Danish forests

Due to its historical context, most Danish forests have been exposed to some level of forest management activities, varying from low impact to very intensive forestry. Today the majority of Denmark's forests are semi-natural ecosystems of composing of either native or exotic tree species, interspersed with a few small pockets of (recovered or remnant) natural forest-like stands. Although the forests area has increased over the last two centuries from 3-4% to more than 14%, the nature value of the pre-1800 forest stands have decreased significantly. This is due to intensive forest management practices aiming to manage even-aged, single-tree species stands. Examples of some the detrimental effects of intensive forest management practices include depleting or draining natural hydrology levels, extensive soil cultivation, eutrophication, removal of mature and over-mature trees and deadwood, semi or natural forest stand replacement with exotic species, coppicing and animal grazing.

Since the mid-1990s, forestry practices in Denmark, especially in State and Municipality owned forest, have shifted from traditional, production oriented forest management towards management regimes with a wider set of goals for conservation, biodiversity, recreation and addressing other social needs such as preserving cultural heritage sites.

Danish forest has been surveyed by Department of Geosciences and Natural Resource Management at Copenhagen University by means of a sample methodology and their biodiversity and conservation values

have been documented under the Danish National Forest Inventory (NFI) hosted by the Danish Nature Agency.

Denmark ratified the Convention on Biological Diversity in 1994. Today more than 11% of Denmark's terrestrial lands are protected, one third of which are classified as IUCN Categories I and II; of which a large number are protected under the Nature Protection Act and the Natura 2000 EU Directive. These areas have been designated specifically to protect species, landscapes, cultural heritage and/or for scientific research and/or education purposes. For conservation areas, i.e., forest management activities are only allowed in accordance with the specific protection for the individual areas, cover approximately 5% of the country's terrestrial land. Approximately, over 6,300 species in 8 major species groups in Denmark have been assessed according to IUCN Red List criteria, and just over 1,500 or 24% of these have been red-listed. Forests constitute 52% of the habitat affiliations for red-listed species. Furthermore, areas enjoying protection under the Forest Act, Natura 2000 and/or the Nature Protection Act are also mapped and available online via the Danish Nature Agency's digital nature map. Biodiversity data is updated regularly by the Danish Nature Agency and, as mentioned above, it will be completing the registry of "especially valuable forest" over 2016 - 2019. There is one forest area in North Zealand which is listed as UNESCO world heritage due to its historical significance as royal 'Parforce' (a type of hunting system) hunting grounds landscape as, the site demonstrates the application of Baroque landscaping principles to forested areas.

DSH (The Biomass producer) has adopted the description above from the Region Risk Assessment for Denmark.

DSHwood's wood chip resource: DSHwood is dealing with all kinds of raw wood, wood chips and sawn wood from the Danish forests. Through our own purchasing and sales organization, we strive to buy wood directly from the supplier and sell directly to the end user. DSHwood is a pure trading company and does not own the own industry or forests.

DSH is sourcing our raw material from our supply base which is Denmark. The feedstock is supplied as wood chips produced in the forest of origin. DSH is purchasing the wood chip from Danish contractors. The contractor is performing the harvesting and chipping operations. DSHwood is supplying the produced wood chips directly from the forest via truck to the customers (heat /power plants/district heating plants)

The distribution of the volumes sold in 2019:

	% Share
Energy	57,35%
Hardwood	10,15%
Softwood	26,96%
Pulpwood	5,54%

The wood that is used for chips, is the utilization of low-quality wood cannot be used for high quality products such as timber, pulpwood.

The resource of Danish woodchip has an origin from forests across the country. Suppliers are a wide section of the Danish forest owners. The chips are typically purchased as follows:

- The forest owner, who is PEFC / FSC certified
- The forest owner who has been responsible for harvesting, driving to road and possibly chipping himself
- For a forest contractor who bought the wood standing and have completed reprocessing himself.

The certified wood will come from the forest owner who is PEFC / FSC certified and from the forest contractor who is approved Biomass Producer. In 2019 7,3% of our purchased chip wood from PEFC/FSC Certified forest.

Forrest management practices are based on the Danish 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 thinning's, 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.

Overview of the proportions of SBP feedstock for chip wood in 2019:

Controlled Feedstock	100 %
SBP-compliant Primary Feedstock	>99%
SBP-compliant Secondary Feedstock	None
SBP-compliant Tertiary Feedstock	None
SBP non-compliant Feedstock	<1%

The German Forest area

DSHwood consider all of Germany as it's Supply Base. DSHwood have 1-5 suppliers which deliver material which is either FSC 100% or 100% PEFC certified. Germany has been included in DSHwood Supply Base by 2020.

Accordig to the National Forest Inventory (2012) the forest in Germany covers 11.4 million hectares equivalent to 32 % of the total landarea of the country. The forest distribution in Germany is quite diverse. The percentage of land covered with forest are low on North German plains due to agricultural activity, and the Southern low mountain ranges are particularly rich in forests. The percentage of deciduous trees is steadily increasing (Period 2002-2012). Four species dominate in the forests of Germany:

- Spruce, covering approx. 2.8 mill ha's (25 % of the forest area). Decreased with 8%.
- Pine covers approx. 2.4 mill ha's (22 % of the forest area). Decreased with 3 %.
- Beech covers approx. 1.7 mill ha's (15 % of the forest area). Increased with 6 %.
- Oak covers approx. 1.1 mill ha's (10 % of the forest area). Increased with 7 %.

Almost all forests in Germany are influenced by humans ("semi-natural"). But structural diversity and naturalness have increased through active forest management. Almost natural or semi-natural tree species composition covers 36% of the forest area (51% in the young forest stands, i.e. trees up to four metres high). Introduced tree species cover 5 % of the forest area. The most common introduced species are Douglas fir (2 %), Japanese larch (0.8 %) and red oak (0.5 %)

Overall mixed stands cover 78% of the forest area and multiple-storied forest stands cover 68% of the forest area. Furthermore natural rejuvenation is used on 85% of the forest area.

Both total standing timber volume and the total forest cover is increasing in Germany. Annual increment in German forests is in average 11.2 m3 per ha and year. In total 121.6 mill m3 per year. Annual harvest represents 62.5 % of annual increment corresponding to an average of 7 m3 per ha and year. In total 76 mill m3 raw timber per year.

Ownership

The Federal Republic of Germany is a federal state. Responsibility for the forests thus mainly lies with the Länder. While the Federal Government merely sets the forest policy framework, the Länder are responsible for the formulation and implementation of forest policy targets. Private persons, corporate entities (mostly municipalities) and the state, i.e. mainly the Länder, own woodlands. Private forest entities own an average forest area size of 5 ha's, that are frequently spread over several smaller areas.

The forest entities with less than 20 ha's of forests represent half of the privately-owned forest area. The largest entities in terms of woodland cover are owned by the state. A state forest entity manages typically between 8.000 and 15.000 ha's and often also performs forest management tasks for private and communal forests. The Federal Government (State forest – National Property) currently owns around 400.000 ha's, which accounts for approximately 3.5 % of the forest area. These are predominantly forests used for military purposes. State forests of the Länder own approximately 29 % of the German forests. Many forest owners in Germany own small and fragmented forests that are hard to manage. Approximately 430.000 forest owners are organized in 3.600 forestry associations to better deal with the specific disadvantages of the fragmented property structures.

Management practices

National forest policy Germany's Forest policies define the framework and rules related to management of forests and timber utilisation. The main forestry regulations at Federal level can be found in the Federal Forest Act. One of the Federal Government's political guidelines is the Forest Strategy 2020. Its aim is to develop an adapted, lasting balance between increasing timber demands on one hand and sustainability on the other hand. The implementation of the Forest Strategy 2020 focus on the following thematic areas:

- Climate change mitigation and climate adaption
- Promotional programmes for small and micro private forest owners to ensure operational objectives within the framework of existing legal forest regulations.
- Promotion of timber as technically and ecologically excellent renewable resource

Another focus area in the German National Forest Policy is to improve forest biological diversity through the following approaches:

- Integrated forest management
- Intensifying the dialogue between forest owners, forestry and nature conservation
- Taking the dynamics of forest ecosystems and unique local features into account
- Balancing the interests of the general public and forest owners
- Creating incentives for nature conservation
- Linking biotope to allow animal and plant species to move from one region to another
- Strengthening environmental protection to counter global and large-area environmental changes
- Implementing biodiversity objectives in federal forest areas

The core disciplines of German silviculture are

- Maintaining forest area
- Increasing the stability, productivity and diversity of the forests
- Adaption to climate change
- Preserving forest genetic resources
- Strictly limited use of chemical plant protection.

Protection of soil and water resources is another important focus area of the German National Forest Policy. Research and education are also emphasised, and the Federal government promotes research through a wide range of funding programmes targeted at national and international level.

Socio economic setting

Germany is a densely populated country. Over 80 mill people live on 35.7 mill ha's. For centuries people have inhabited and cultivated Germany intensively. 13 % of the national area is used for settlements and transportation. 52 % of the area is used for agriculture, making it the largest land use form in Germany followed by forests or forestry with 32 %. In recent decades, there has been an increasing competition between different types of land use, like production of timber for consumption and nature conservation and recreation.

In communal forests 96 % of all income is generated by sale of timber. In private forests this figure is as high as 98 %. The socially desired protective and recreational functions of forests in Germany are financed almost entirely from this income. In the state forest of the Länder the additional costs and diminished proceeds are largely compensated by subsidies from the state budgets (up to 150 EUR/ha's). In the case of private and municipal forest holdings public support has so far been comparatively low in this area (4 EUR and 9 EUR respectively).

Economy of the forest sector

In the period 2008-2014, German forestry was a profitable economic sector. The companies in the domestic timber industry are highly concentrated in rural regions and at the same time highly integrated in the global economy.

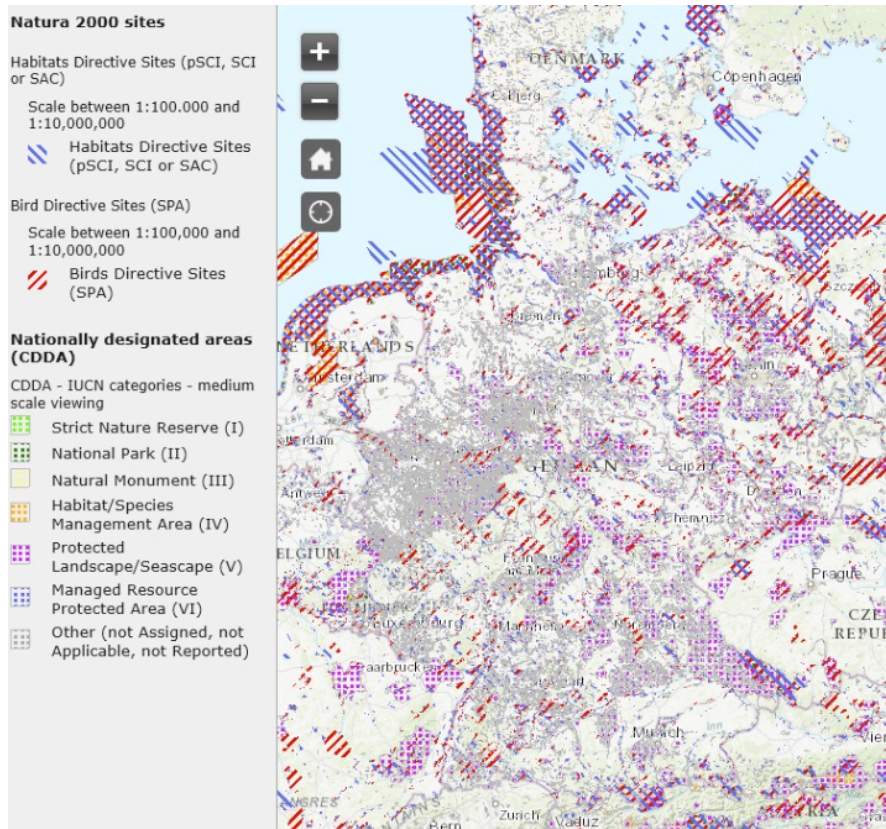
- In 2012, net business profits exceeded 1 billion EUR/year
- The German national cluster of forestry and timber generated sales of 178 billion EUR and a gross added value of 55 billion EUR in 2014
- EU countries are the primary trade partners accounting for approx. 80 % of total trade.
- Germany is the third largest exporter (by value) of timber and timber-based products worldwide
- In Germany, a total of approx. 132 mill m³ timber are consumed per year. 58 % of this originates from raw forest timber
- Per capita consumption of timber is approx. 1.4 m³ annually.
- Two thirds of timber harvested in Germany are used for construction, timber-based materials and paper. One third are used for energy production.
- 1.1 mill people are employed in the German forest and timber industry (3.4 % of total) in some 25,000 companies.

Conservation CITES or IUCN species

CITES habitat species are present in Germany but do not include species traded by DSHwood. Germany has a number of IUCN categories, covering the following categories:

- Strict nature reserves
- National Parks
- Habitat / species management areas
- Protected landscapes

Large areas are also designated as Natura 2000 protected Habitat Directive Sites or Bird Directive sites.



The ecological value of forest in Germany has improved significantly in recent decades. The Red List of endangered biotope types of Germany shows that development has stabilised in many forest biotopes. However, Germany's Red Lists for the forests still show species of animals, fungi and plants that are considered endangered and threatened with extinction. These include many species that are dependent on old forest stands, undisturbed forest development and deadwood components.

The last monitoring of the NATURA 2000 network (period 2007-2012) showed that 79 % of forest habitat types have a "favourable" conservation status, 12 % were rated "unfavourable-insufficient" and 9% "unfavourable-poor".

Forest use in areas that are protected by the German Federal Nature Conservation Act is generally limited to the extent necessary to achieve the respective protection objectives. 1

- NATURA 2000 protected areas in forests: 2.7 mill has or 24% of the forest area
- Forest protected areas with specific use restrictions: 1.9% of the forest area

Species traded by DSHwood in Germany

[INSERT TABLE FROM SBR WORD VERSION]

- 1 <https://www.eea.europa.eu/data-and-maps/explore-interactive-maps/european-protected-areas-1>
- 2 <https://www.umweltbundesamt.de/daten/land-forstwirtschaft/forstwirtschaft#textpart-1>
- 3 <http://checklist.cites.org/#/en>
- 3 <https://www.iucnredlist.org/search>

5.3 Detailed description of Supply Base

DSHwood defines its Supply Base as all of Denmark and exclusively FSC and / or PEFC certified forest in Germany. Data below regarding Denmark is collected from the National Forest Inventory (2017). Data regarding Germany is collected from National Forest Inventory (2012).

Supply Base – Denmark

Supply Base

- a. Total Supply Base area (ha): 625.603 ha
- b. Tenure by type (ha): 460.753 ha Privately owned/ 152187 ha Public/ 0 ha Community concession/ 12.663 ha unknown
- c. Forest by type (ha): 0 ha Boreal/ 625.603 ha Temperate/ 0 ha Tropical
- d. Forest by management type (ha): 413.153 ha Plantation/ 115.532 ha Managed Natural/31.696 ha Natural forest, 4.740 ha ancient management forms, 22.819 ha protective forest, 22.174 ha other, 11.471 ha unstocked, 4.019 ha Unknow.
- e. Certified forest by scheme (ha): 213.976 ha of FSC or 289.292 ha PEFC-certified forest. (<http://www.trae.dk/leksikon/certificering-af-skovdrift-systemerne/>) Please note that many forests hold both FSC and PEFC PEFC certificates.

Supply Base – Germany

Supply Base

- a. Total Supply Base area (ha): The area covered by forests in Germany is about 11.4 million hectares. Approximately 8.000.000 ha are certified under PEFC and/or FSC.
- b. Tenure by type (ha): 5.586.000 Privately owned/ 4.788.000 ha Public/ 0 ha Community concession/ 1.026.000 ha unknown
- c. Forest by type (ha): 0 ha Boreal/ 11.400.000 ha Temperate/ 0 ha Tropical
- d. Forest by management type (ha): 5.283.000 ha Plantation/ 5.793.000 ha Managed Natural/ 324.000 ha Natural
- e. Certified forest by scheme (ha): 7.3 million ha PEFC and/or 1.1 million hectares FSC.

5.4 Chain of Custody system

DSHwood A/S holds FSC and PEFC Chain of Custody (CoC) certificates issued by NEPCo and have the PEFC CoC certificate number NC-PEFC/COC-000079 and FSC certificate number NC-COC-011786. The organization implements a PEFC CoC transfer system based on physical segregation. SBP claims are only made for material that is delivered from the forest of origin, where physical segregation is ensured during transport and storage, 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, forest stack volumes. production orders and transports. The volume information is also recorded in the ERP system, where in- and outbound sales documents are generated and recorded.

6 Evaluation process

6.1 Timing of evaluation activities

The SBP annual surveillance audit was carried out on June 8, 9 and 10, 2020, with a closing meeting conducted at the organization's office at the end of June 10, 2020. The first day was an office audit at DSHwood's main office in Fredericia, Denmark, carried out concurrently with the annual FSC and PEFC audits.

Field visits are conducted on the basis of the inventory of ongoing 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. The sample size was determined after taking into account the approximate number of annual wood chip projects/purchases delivered to the customers in the scope of this certification (app. 284) and an approach based on a sample size of 0.6 x square root of the number of projects yielded a sample of 11 sites. The sites were 6 in Region Sjælland and 5 in Region Syddanmark.

The SBP annual surveillance audit was conducted in accordance with the audit plan sent to the BP prior to the audit; however, the closing meeting was conducted via telephone conference on June 20, 2020.

In total, 3 days were used for this evaluation: 1 day at the BP's main office site and 2 days for field audits of forests and forest stands. Ten sites were visited in Region Sjælland, while six sites were visited in Region Syddanmark. Two out of four storage sites were also visited. The time used for reporting and administration is not included in these figures.

Monday, June 8, 2020

Activity	Location	Auditor	Date/time
Opening meeting* <ul style="list-style-type: none"> • Presentation of participants • Changes in the organization since last audit • Changes in standards and requirements • Special subject that the organization would like to discuss 	DSHwood main office	CAR	8/6 - 2020 8:00 – 8:30
Review of documentation <ul style="list-style-type: none"> • Central office administration • Documented procedures • FSC and PEFC product groups • Supplier records • Volume data summaries • Follow up on open NCRs from last audit • Risk assessments regarding Controlled Wood 	DSHwood main office	CAR	8:30 – 10:30
Review of purchase and sales functions: <ul style="list-style-type: none"> • Orders handling during purchase and sales and interviews with relevant personnel • Review of FSC og PEFC logo usage 	DSHwood main office	CAR	10:30 – 11:00

Review of system for sourcing of FSC Controlled Wood, including: <ul style="list-style-type: none"> • Due Diligence system and public summary (DK/ENG) • Supplier records • Control measures and implementation of these • Internal control of control measures • Planning of field visits 	DSHwood main office	CAR	11:00 – 12:30
Break			12:30 – 13:00
Review of SBP Procedurer and documentation: <ul style="list-style-type: none"> • Supply Base Report and annual update • SBP documented procedurer • Internal audits and management review • Planning and implementation of risiko mitigating measures according to source type (subscopes) • Supplier Verification Program • Competences and training measures • Complaints handling • Review of SBP Logo usage 	DSHwood main office	CAR	13:00 – 14:30
Review of SBP CoC system <ul style="list-style-type: none"> • Procedures for CoC system • Review of documentation: Projekt records, maps, purchase- and sales documentation (interviews with relevant personnel) • Review of sales documenter: SBP invoices, transport documents, reporting of emissions data and SBP DTS system. • Visit to storage site at Main office address. 	DSHwood main office and Storage site	CAR	14:30 – 15:30
Review of system for collection and communication of energy og emssions data <ul style="list-style-type: none"> • Reporting periode • Transport data • Records of fuel consumption during transport and storage • „SAR“ • Static Biomass Profiling Data 	DSHwood main office	CAR	15:30 – 16:30
Closing meeting* Auditor summarizes preliminary audit conclusions. Program for field visits are finalized.	DSHwood main office	CAR	16:30 – 17:00

June 9 - 10, 2020

June 9, 2020			
Activity	Location	Auditor(s)	Time (ca.)

Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site SR-02258-01	CAR	9.00-9:45
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site 7968-00	CAR	9.45 - 10:30
Visit at Storage site Turebyholm	Storage site Turebyholm	CAR	10:30 – 11:00
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site SR-02286-01	CAR	11.00 - 11:30
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site SA-30819-02	CAR	12.00-12:30
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site SA-30220-03	CAR	13.30-14:00
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier sites VK-01002-01	CAR	15.30-15:45

June 10, 2020			
Activity	Location	Auditor(s)	Time (ca.)
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site PK-01700-01	CAR	8.00 - 8:30
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site PK-01495-01	CAR	9:30 – 10:00
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site KE-01223-01	CAR	11.00 - 11:30
Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier sites 00804-01	CAR	13.00-13:30

Evaluation at forest of origin of primary feedstock, evaluation of relevant mitigation measures.	Supplier site BS-1704	CAR	15:00 – 15:30
Activity	Location	Auditor(s)	Time (ca.)
Closing meeting. Auditor presents NCRs and audit conclusions. Participation from management representative.	Main Office	CAR	16.30 - 17:00

6.2 Description of evaluation activities

Auditor was welcomed in the DSHwood office in Fredericia, Denmark. Audit started with an opening meeting attended by Managing Director Rasmus Grønberg Bak, Daily responsible Erik T. Kjær, Certification Consultant Anders Bjørnkjær-Nielsen and DSHwood Staff member Jeppe Kristoffersen and Jens Røge.

Auditor introduced himself, provided information about audit plan, methodology and aim of the audit. CB's approval related issues and confidentiality issues were covered as well.

After that auditor went through all applicable requirements of the standard covering management system, CoC, recordkeeping requirements and verification of SBP compliant biomass. Later, the purchasing and logistics functions were audited. During the process overall responsible person for SBP system and staff having key responsibilities within the system were interviewed.

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 and the Certification Body as a part of the 2017 Main assessment process. No additional stakeholder process has been carried out during this 2018 annual surveillance audit. Neither the BP nor the CB has received any complaints nor stakeholder comments since the last audit.

7 Results

7.1 Main strengths and weaknesses

Main strengths: The main strengths of the BP lie in the well documented processes. The management system provides a strong backbone for implementing the SBP requirements. The BP has a professional staff of foresters with good training and qualifications for sourcing feedstock. The BP has also taken actions and provided training for contractors to ensure they know requirements relevant for them. The BP showed strong engagement in implementation of the SBP system and a positive approach.

The contractors have at least one operator that have attended a three-day training course in machine operation in nature-like forest. This course is a requirement for forest contractors that operate in the FSC and PEFC certified Danish state forests. Except of this course, all contacts had at least one operator that had participated in DSHwood's training for screening of forest stands.

The BP has worked closely with the consultant Anders Bjørnkjær-Nielsen from B4trees ApS, who has assisted in creating the Supply Base Report and the documented management system, etc. The BP 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 in-house staff that are professional foresters, but the organization is reliant on contractors when sourcing biomass. This means that the contractors or their partners are conducting field visits and identification and mapping of "key biotopes" prior to starting harvests and wood chip production in specified risk stands. The BP does not have easily assessable fuel consumption data for harvest, extraction and chipping of biomass, and will therefore instead report default values in accordance with Instruction Document 5E.

7.2 Rigour of Supply Base Evaluation

At the time of the 2020 annual surveillance audit, 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 Regional Risk Assessment for Denmark, which has been widely circulated for stakeholder consultation. Based on the "specified risks" in this risk assessment the organization has adapted mitigation measures, which were consulted with relevant stakeholders during a meeting held on the 20th of May 2016, and calls/e-mails which took place prior the assessment.

The stakeholder consultation process started with sending a notification email, including the SBR and SBE to numerous stakeholders. The BP keeps records of communication with stakeholders.

The supply base evaluation was a rigorous process, and there has generally been acceptance of the defined sub-scopes and the associated risk conclusions.

7.3 Collection and Communication of Data

Since reliable fuel consumption data is not available from the contractors, the BP has not systematically recorded data on greenhouse gas emissions, and therefore the BP 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.

The BP has opted to use the accepted Default Values from BioGrace II for reporting fuel used in forestry used and felling/chipping. Auditor has accepted the justification that actual fuel use records were not available at the time of this surveillance audit, but the BP actively and accurately records all relevant travel distances, net weights and volumes and moisture contents.

7.4 Competency of involved personnel

Both administrative staff showed good awareness of their management system, and of the objectives and restrictions in the SBP system.

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

The BP has worked closely with the consultant Anders Bjørnkjær-Nielsen from B4trees ApS, who has assisted in creating the documented management system, SAR, Static Biomass Profiling Data etc. The BP 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.

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

7.5 Stakeholder feedback

Neither the BP nor the CB has received any complaints nor stakeholder comments since the last audit.

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 only implements SBE for feedstock from Denmark; all feedstock sourced from Germany is sourced as FSC or PEFC certified. The BP has used the SBP endorsed Regional Risk assessment for Denmark and has recognized all the risk ratings from this document. The BP has established and implemented mitigating measures, with the objective of lowering the final risk rating for all indicators to "low".

The CB accepts the BP's choice to use the SBP-endorsed Regional Risk Assessment, which is seen as a credible risk assessment, based on a thorough stakeholder process.

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 used the suggested mitigation measures in the Regional Risk Assessment for Denmark, which found 4 Indicators with specified risk and suggests mitigating measures. The table below shows the specified risk Indicators and the corresponding mitigation methods that the BP will implement. However, the BP will not implement the suggestion that HCV maps are made publicly available. Lead auditor finds that it is acceptable to omit this suggestion, as a measure to protect the privacy of the private land owners where the wood chips are produced, that it is not central to the effectiveness of the mitigating measures and also could be costly to implement.

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. 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	Mitigating measure
<p>2.1.1 Forests and other areas with high conservation values in the Supply Base are identified and mapped.</p>	<p><i>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.</i></p> <p><i>The BP creates a map for all wood chip production areas, and all projects 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. 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 is 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 as "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.</i></p>

<p>2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</p>	<p>For all wood chip production areas the following material is given to the operator(s):</p> <ul style="list-style-type: none"> - Map of project area - Written instructions from project manager (owner-operator) - Checklist as per 2.1.1 - Any other relevant information <p>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,</p>
<p>2.2.3 Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).</p>	<p>Risk mitigation measures are the same as for Indicator 2.1.2:</p> <p>For all wood chip production areas the following material is given to the operator(s):</p> <ul style="list-style-type: none"> - Map of project area - Written instructions from project manager (owner-operator) - Checklist as per 2.1.1 - Any other relevant information <p>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,</p>
<p>2.2.4: Biodiversity is protected</p>	<p>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.</p> <p>Due to the technical requirements that the biomass shall fulfill 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.</p>

10 Non-conformities and observations

Identify all non-conformities and observations raised/closed during the evaluation (a tabular format below may be used here). Please use as many copies of the table as needed. For each, give details to include at least the following:

- *applicable requirement(s)*
- *grading of the non-conformity (major or minor) or observation with supporting rationale*
- *timeframe for resolution of the non-conformity*
- *a statement as to whether the non-conformity is likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks.*

N/A

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:	N/A