

DNV GL Business Assurance Finland Oy Ab Evaluation of Biomasse Børsen ApS Compliance with the SBP Framework: Public Summary Report

Fourth Surveillance Audit

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1 Overview

Certification Body (CB) Name: DNV GL Business Assurance Finland Oy Ab

Primary CB contact for SBP: Jyrki Sopanen

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Audit team leader: Karina Seeberg Kitnaes

Audit team members: Karina Seeberg Kitnaes

Name of the Company: Biomasse Børsen ApS

Company legal address: Stavnagervej 2, DK-6760 Ribe, Denmark

Company contact for SBP: Paul Lillelund

Company contact email: pl@biomasseborsen.dk

Company website: N/A

SBP Certificate Code: SBP-05-07

Date of certificate issue: 02 Jun 2017

Date of certificate expiry: 01 Jun 2022

Audit closing meeting date: 19 Mar 2021

Audit cycle: Fourth Surveillance Audit

2 Scope of the evaluation and SBP certificate

Scope Item	Check all that apply to the Certificate Scope	Change in scope (N/A for Assessments)
Primary Activity:	Biomass Producer	
Approved Standards:	SBP Standard 1: Feedstock Compliance Standard; SBP Standard 2: Verification of SBP-compliant Feedstock; SBP Standard 4: Chain of Custody; SBP Standard 5: Collection and Communication of Data Instruction; Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.3	
Includes Supply Base Evaluation (SBE):	Yes	
Includes communication of Dynamic Batch Sustainability Data (DBSD)	No	
Includes Group Scheme	No	
Products	Chips	

Feedstock types:	Primary	
Feedstock origin (countries):	Denmark	
SBP-endorsed Regional Risk Assessments used: Public link: https://sbp- cert.org/documents/standards- documents/risk-assessments/	Denmark	
Chain of custody system implemented:	PEFC, FSC: FSC: SA-COC-005618. PEFC: SA-PEFC-COC-005618.	
	Transfer	

2.1 Description of the company

Biomasse Børsen ApS is a Danish company, which purchases roundwood and wood chips from Danish forests and surrounding landscapes. The company produces and trades wood chips. The company office located near Ribe in Denmark is responsible for the trading, chain-of-custody and wood chipping. In the context of SBP, the company has two storage facilities, one located next to the office and one next to one of the customers/end-point in Denmark. The raw materials are primary feedstock (roundwood) originating from Danish forests and surrounding landscape, which are either chipped in the forest as part of the harvest operation and placed at roadside or transported to the company' two permanent storage facilities, where the wood is then chipped. The wood chips are sold and transported to the Danish energy sector, where the buyer takes over the responsibilities. The company holds valid PEFC and FSC COC certificates. The feedstock sold as SBP-compliant is non-certified but controlled through the company SBE including SVP, implementation of risk mitigation measures and use of the SBP endorsed RRA.

2.2 Detailed description of the Chain of Custody system

The BP has valid FSC and PEFC certificates covering chips and wood issued by Soil Association Certification: Certificate codes: FSC: SA-COC-005618 and PEFC: SA-PEFC/COC-005618. All feedstock sourced is covered by the BP's own wood traceability system, which is third party certified according to both FSC and PEFC Chain of Custody. All feedstock is sourced through the FSC and PEFC COC systems of the company, which covers wood chips as a product group. The scope of the FSC system is transfer system and the scope of the PEFC system is physical separation in all phases with purchase of roundwood or wood chips, chipping, storage, transport and sales of wood chips. Based on the reviewed supplier invoices, claims are transferred correctly to sales documents if inputs are purchased as FSC or PEFC certified. This system is applied for SBP as well, since the same processes are transport, storage, chipping and loading from storage facilities. The BP purchases non-certified roundwood and through the SBE using the approved RRA for Denmark and SVP plus field verification and control measures sells biomass as SBP-compliant biomass to customers holding valid SBP certificate. All non-certified feedstock are kept separate and is traceable

during all phases from the forest to the customer. The BP is aware of the SBP claims and batch specific coding system, which is used on the sales invoices and in the DTS database for the monthly transactions. The company maintains annual volume accounts and calculations for all inputs and outputs.

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.

4 Evaluation process

4.1 Timing of evaluation activities

Audit Level of Effort (LoE)			
Activity	Auditors	Auditor hours	
1. Preparation	Karina Seeberg Kitnaes	8,0	
2. On-site (excl. travel time)	Karina Seeberg Kitnaes	12,0	
3. Report writing	Karina Seeberg Kitnaes	4,0	
4. Other	Jyrki Sopanen	4,0	

Audit Schedule			
Activity	Location	Auditor name	Date/time
Audit planning, document review	Home office	Karina Seeberg Kitnaes	01 Feb 2021/08:00
Opening meeting	TEAMS	Karina Seeberg Kitnaes	08 Feb 2021/10:00
SBP Standard 4: Chain of Custody	TEAMS	Karina Seeberg Kitnaes	08 Feb 2021/10.30
SBP Standard 1: Feedstock Complaince	TEAMS	Karina Seeberg Kitnaes	10 Feb 2021/10:00

SBP Standard 2: Verification of Feedstock	TEAMS	Karina Seeberg Kitnaes	10 Feb 2021/12:00
SBP Standard 5: Collection and Communication of Data, instruction doc 5E	TEAMS	Karina Seeberg Kitnaes	11 Feb 2021/10:00
Field visits related to Std 1 and 2	Field onsite forest operations	Karina Seeberg Kitnaes	19 Mar 2021/09:00
Review and reporting	Home office	Karina Seeberg Kitnaes	29 Mar 2021/08:00
Technical Review	Home office	Jyrki Sopanen	30 Mar 2021/08:00

Auditor qualification		
Auditor name	Role	Qualification
Karina Seeberg Kitnaes	Lead Auditor	biologist, M.Sc., approved SBP auditor, 24 years of professional international experience with forest biodiversity, forestry, forest industry, certification, Natura 2000 implementation, key biotope mapping from working as senior expert on targeted international projects in Northern, North-Eastern and Eastern Europe and many other countries

4.2 Description of evaluation activities

The audit method included: a) records verification, document and report review and interviews of staff regarding the management system descriptions, calculations and invoicing arrangements at the office and b) site visit at the forest of origin, mobile chipping and storage facility. The audit was partly conducted as a remote audit due to COVID-19 restrictions.

The part 1) remote audit via TEAMs with sharing of screen and exchange of documentation via emailing:

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

The part 2) Onsite audit with field visits:

- Site inspection of harvesting sites, forests of origin, and of storage and chipping facility with tracking of timber batches and measurement and classification of feedstock.

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

The P4 resulted in closure of one nonconformity and maintenance of one observation.

4.3 Sampling methodology

Sampling methodology based on the following complexity factors: Number of Supply Bases: 1, Denmark Number of suppliers: multiple forest owners by own or external contractors. Types of risk identified: four specified risk indicators in RRA = same risks: damage to key biotopes/natur values in unevenaged boradleaved forest stands. Number of risk mitigation measures: 3: screening, field verification and monitoring of contractors. Results of internal monitoring by the BP: low risk, no damage observed. Review by sampling included: - DTS transactions and data related to all recorded transactions. - SAR report and all data and records related to the reported data. - Staff interview of all staff members (only 3) - Review of origin, screening and field verification by sampling of 10 projects: 10 project examples reviewed; 6 sampling of screening and performed field verification performed and 2 contractors checked (interview and review of sampled operations)

4.4 CB stakeholder engagement

N/A, this is a periodic surveillance

4.5 Stakeholder feedback

N/A, this is a periodic surveillance.

5 Results

5.1 Main strengths and weaknesses

The main strengths of the BP includes proven competency and experience of trading and forest management in the management team. During the review and evaluation of the company' SBE with using the SBP-endorsed RRA for Denmark and the SVP, the strengths of the company include the clear track of feedstock to origin and its flows from the forest to the energy sector, the full overview of sets of suppliers, the well-developed SVP and the use of the SBP approved RRA for Denmark with identification of four indicators with specified risk. The BP implements clear risk mitigation measures to get the four specified risk indicators down to low risk, including supplier monitoring, system setup, procedures, control and monitoring of forest operations.

The auditor did not identify any significant weaknesses.

5.2 Rigour of Supply Base Evaluation

There is a SBP endorsed Regional Risk Assessment for Denmark, June 2017. The Company applies the RRA and has conducted a rigorous Supply Base Evaluation of the defined Supply Base. For the risk assessment (RRA), the risk is low for all indicators of the SBP Standard 1 apart from four indicators: 2.1.1, 2.1.2, 2.2.3 and 2.2.4. The Company has built the developed mitigation measures for these four indicators into its procedures and feedstock sourcing programmes and has sufficient knowledge and procedures in place to demonstrate also low risk in practise for all indicators. For the four indicators with specified risk in the RRA, the company has developed clear risk mitigation measures, including supplier training for each defined set of similar suppliers in their SVP, and procedures, routines, apps, documents and records and control mechanisms for suppliers and own staff performing control of the forest operations conducted by forest contractors. The evaluation found that the mitigation measures are sufficient to bring the risk down to low for the four indicators.

5.3 Collection and communication of data

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

5.4 Competency of involved personnel

The company has three active owners (self-employed) and one bookkeeper on part-time basis. The owners responsible for the management and control system has a long experience of system management, professional control of forest management and forest operations. The knowledge and experience of the responsible personnel relating to GHG data profiling procedures is also found to be on a suitable level.

6 Review of company's risk assessments

6.1 Overview of company's risk assessments and mitigation measures

The company uses the SBP endorsed Regional Risk Assessment for Denmark, June 2017. The four indicators with specified risk in the SBP endorsed RRA for Denmark are: 2.1.1, 2.1.2, 2.2.3 and 2.2.3.

The BP implements appropriate systems and procedures as risk mitigation measures to ensure all indicators are low. The four specified risk indicators are all related to appropriate control systems and procedures to identify, address potential threats and avoid damage to nature values during forest operations. As part of the SBE, the BP has setup the SVP including risk rating, identification of risk factors, listing suppliers, defining sets of suppliers, developing tools, procedures and training for all suppliers (forest contractors under own control and other suppliers).

The risk mitigation measures covering all four indicators are targeting both:

- a) Forest operations controlled by Biomasse Børsen and performed by forest contractors, and
- b) Forest operations where Biomasse Børsen receives the wood chips from suppliers with indirect control of the forest operations. Risk mitigation measures:

For each new project, i.e. assignment to purchase roundwood or wood chips, a risk assessment is carried out with screening of the forest of origin from where biomass is harvested. This screening is conducted to clarify whether the site on the basis of the indicators: 2.1.1, 2.1.2, 2.2.3, 2.2.4, has to be classified as a risk area.

The assessment is based on available national maps and databases accessible on internet or via a nature portal maintained by the Danish authorities, as well as a physical examination of the forest area before the forest operation is started. The screening and the resulting implementation of the risk mitigation measures contribute to minimizing any negative impacts on ecosystems, biodiversity and conservation areas and thereby converted the risk into low risk. The procedure for mapping and checking the forest area, where the feedstock will be harvested includes the following;

- 1) Each project is assigned a unique project ID that recur in the short, job description, weight slips and invoices etc.
- 2) Site map developed based on relevant map applications, incl. "Arealinformation" and "Miljøgis" with HNV (high nature value) forest or DM & E map program with relevant map layers (Map and detailed maps indicating the workspace and protected zones, if any, FSC and PEFC certified FMUs and/or green forest management plan involved "account card" in the planning process, so of values can be secured. These cards attached to the project).
- 3) Completion of checklist: a) Map Screening, the affected items in the checklist ticked; b) description of any remedial action; c) definition of product status; d) presentation of the person responsible for screening; e) Physical screening / review of the felling area to be implemented by Broadleaf stands; f) Uneven Aging stands; g) Areas with HNV value from 10 and up and h) Areas of Conservation, monuments, etc.

- 4) Physical screening with identifying any key habitats and valuable nature areas.
- 5) Physical screening may be omitted if the screening of existing maps and databases does not reveal any risks and the forest operation is: a) thinning of afforestation / 1st generation forest site; b) thinning in evenaged coniferous forest stand, c) the work area is outside the forest and the operation performed is not impacting any nature values.
- 6) For each project, a work instruction is prepared, which describes how the forest operation/task is to be solved and which measures must be taken on site.

The SVP and implemented training programme: Biomasse Børsen has developed and implemented a SVP including a training programme of forest contractors/suppliers of feedstock. The suppliers have been listed and categorised and a contractors handbook developed, which clearly explains how the suppliers/contractors are screened and trained, as well as how the supplier/contractor have to apply the work instruction and maps resulting from the screening of the individual forest area. Biomasse Børsen then controls that the supplier/contractor has implemented the screening, the mapping, the work instruction and the forest operation without negative impact on any nature values on site. Next to the contractor handbook, Biomasse Børsen has developed a Tradenda app, where all information is available and shared between Biomasse Børsen and the supplier/contractor.

Guide to perform the screening of the forest area before forest operations: The company has developed a guide to Danish contractors and suppliers on how they must screen the forest or landscape area before any harvest operations and how to use the Tradenda app. The guide includes the obligatory desk based and field screening to be performed and how the results must be made available to the company, so that the company will hold records proving implementation of risk mitigation measures securing low risk of negative impact on nature values.

Monitoring of implementation of the risk mitigation measures: The Biomasse Børsen has prepared and implemented a monitoring plan by sampling of the suppliers of Roundwood and wood chips respectively, which include clear sampling rules and how to monitor that the required mitigation measures are being implemented, records are being kept and whether the measures were shown to be effective in addressing the identified risks. The review of the lead auditor included checking forest operation sites, interviewing contractors of the suppliers, checking training programme implemented and checking the Tradenda app information and examples of maps with known nature values, project work instructions, documentation and company evaluation.

6.2 Specified risk indicators and mitigation measures

Country/Area	Indicator	Specified risk description	Mitigation measure
Denmark	2.1.1 The BP has implemented appropriate control systems and	There can be defined different "source types" e.i. sources of biomass feedstock that share properties with regard to presence, mapping and protection HCVs, including Key biotopes and	The risk mitigation measures covering all four indicators are targeting both:

procedures for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped.

biodiversity in a broader sense, the following source types are defined and their risk levels assessed: 1. Feedstock originating from FSC or PEFC certified forests: LOW RISK. 2. Feedstock originating from forest estates with a Green Management plan: LOW RISK. 3. Feedstock from thinning in even-¬aged stands of conifers: LOW RISK. 4. Feedstock from thinning in first generation afforestation areas: LOW RISK. 5. Feedstock from uneven-¬aged stands or stands of broadleaf species: Due to no legal requirement for identification and mapping of Key biotopes, it is assessed that for all other forest sources of biomass feedstock, the risk of HCVs being present, but not identified or mapped is specified: SPECIFIED RISK. 6. Feedstock from non-¬forest areas, e.g. nature maintenance projects, windbreaks or residential areas: LOW RISK.

- a) Forest operations controlled by The BP and performed by forest contractors, and
- b) Forest operations where The BP receives the wood chips from suppliers with indirect control of the forest operations. Risk mitigation measures:

For each new project, i.e. assignment to purchase roundwood or wood chips, a risk assessment is carried out with screening of the forest of origin from where biomass is harvested. This screening is conducted to clarify whether the site on the basis of the indicators: 2.1.1, 2.1.2, 2.2.3, 2.2.4, has to be classified as a risk area.

The assessment is based on available national maps and databases accessible on internet or via a nature portal maintained by the Danish authorities, as well as a physical examination of the forest area before the forest operation is started. The screening and the resulting implementation of the risk mitigation measures contribute to minimizing any negative impacts on ecosystems, biodiversity and conservation areas and thereby converted the risk into low risk. The procedure for mapping and checking the forest area, where the feedstock will be harvested includes the following;

- 1) Each project is assigned a unique project ID that recur in the short, job description, weight slips and invoices etc.
- 2) Site map developed based on relevant map applications, incl. "Arealinformation" and "Miljøgis" with HNV (high nature value) forest or DM & E map program with relevant map layers (Map and detailed maps indicating the

workspace and protected zones, if any, FSC and PEFC certified FMUs and/or green forest management plan involved "account card" in the planning process, so of values can be secured. These cards attached to the project).

- 3) Completion of checklist: a) Map Screening, the affected items in the checklist ticked; b) description of any remedial action; c) definition of product status; d) presentation of the person responsible for screening; e) Physical screening / review of the felling area to be implemented by Broadleaf stands; f) Uneven Aging stands; g) Areas with HNV value from 10 and up and h) Areas of Conservation, monuments, etc.
- 4) Physical screening with identifying any key habitats and valuable nature areas.
- 5) Physical screening may be omitted if the screening of existing maps and databases does not reveal any risks and the forest operation is: a) thinning of afforestation / 1st generation forest site; b) thinning in even-aged coniferous forest stand, c) the work area is outside the forest and the operation performed is not impacting any nature values.
- 6) For each project, a work instruction is prepared, which describes how the forest operation/task is to be solved and which measures must be taken on site.

The SVP and implemented training programme: The BP has developed and implemented a SVP including a training programme of forest contractors/suppliers of feedstock. The suppliers have been listed and categorised and a contractors handbook developed, which clearly

explains how the suppliers/contractors are screened and trained, as well as how the supplier/contractor have to apply the work instruction and maps resulting from the screening of the individual forest area. The BP then controls that the supplier/contractor has implemented the screening, the mapping, the work instruction and the forest operation without negative impact on any nature values on site. Next to the contractor handbook, The BP has developed a Tradenda app, where all information is available and shared between The BP and the supplier/contractor.

Guide to perform the screening of the forest area before forest operations: The company has developed a guide to Danish contractors and suppliers on how they must screen the forest or landscape area before any harvest operations and how to use the Tradenda app. The guide includes the obligatory desk based and field screening to be performed and how the results must be made available to the company, so that the company will hold records proving implementation of risk mitigation measures securing low risk of negative impact on nature values.

Monitoring of implementation of the risk mitigation measures: The BP has prepared and implemented a monitoring plan by sampling of the suppliers of Roundwood and wood chips respectively, which include clear sampling rules and how to monitor that the required mitigation measures are being implemented, records are being kept and whether the measures were shown to be effective in addressing the identified risks. The review of the lead auditor included checking forest operation sites, interviewing contractors of the suppliers,

checking training programme implemented and checking the Tradenda app information and examples of maps with known nature values, project work instructions, documentation and company evaluation. Denmark 2.1.2 The BP There can be defined different has "source types" e.i. sources of implemented biomass feedstock that share The risk mitigation measures appropriate properties with regard to covering all four indicators are control presence, mapping and protection targeting both: systems and HCVs, including Key biotopes and a) Forest operations controlled by procedures to biodiversity in a broader sense, The BP and performed by forest identify and the following source types are contractors, and address defined and their risk levels potential assessed: 1. Feedstock b) Forest operations where The BP threats to originating from FSC or PEFC receives the wood chips from forests and certified forests: LOW RISK. 2. suppliers with indirect control of the forest operations. Risk mitigation other areas Feedstock originating from forest measures: with high estates with a Green conservation Management plan: It is a For each new project, i.e. values from requirement for receiving assignment to purchase forest subsidies for developing a Green roundwood or wood chips, a risk management Management plan that HCV areas assessment is carried out with activities. in the forest are identified and screening of the forest of origin from where biomass is harvested. mapped. However, there is no This screening is conducted to strict requirement that the HCVs clarify whether the site on the basis are monitored and protected from of the indicators: 2.1.1, 2.1.2, 2.2.3, forest management. SPECIFIED 2.2.4. has to be classified as a risk RISK. 3. Feedstock from thinning area. in even-¬aged stands of conifers: LOW RISK. 4. Feedstock from The assessment is based on thinning in first generation available national maps and databases accessible on internet or afforestation areas: LOW RISK. 5. via a nature portal maintained by Feedstock from uneven-¬aged the Danish authorities, as well as a stands or stands of broadleaf physical examination of the forest species: Due to no legal area before the forest operation is requirement for identification and started. The screening and the mapping of Key biotopes, it is resulting implementation of the risk mitigation measures contribute to assessed that for all other forest minimizing any negative impacts on sources of biomass feedstock, the ecosystems, biodiversity and risk of HCVs being present, but conservation areas and thereby not identified or mapped is converted the risk into low risk. The specified: SPECIFIED RISK. 6. procedure for mapping and Feedstock from non-¬forest

areas, e.g. nature maintenance projects, windbreaks or residential areas: LOW RISK.

checking the forest area, where the feedstock will be harvested includes the following;

- 1) Each project is assigned a unique project ID that recur in the short, job description, weight slips and invoices etc.
- 2) Site map developed based on relevant map applications, incl. "Arealinformation" and "Miljøgis" with HNV (high nature value) forest or DM & E map program with relevant map layers (Map and detailed maps indicating the workspace and protected zones, if any, FSC and PEFC certified FMUs and/or green forest management plan involved "account card" in the planning process, so of values can be secured. These cards attached to the project).
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Monitoring of implementation of the risk mitigation measures: The BP has prepared and implemented a monitoring plan by sampling of the suppliers of Roundwood and wood chips respectively, which include clear sampling rules and how to monitor that the required mitigation measures are being implemented, records are being kept and whether the measures were shown to be effective in addressing the identified risks. The review of the lead auditor included checking forest operation sites, interviewing contractors of the suppliers, checking training programme implemented and checking the Tradenda app information and examples of maps with known nature values, project work instructions, documentation and company evaluation.

Denmark

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

Based on the existing protection through the Forest Act and designation of Natura 2000 areas and individual protected areas, it is concluded that larger scale key ecosystems and habitats are sufficiently protected, and that sourcing of feedstock for biomass does not pose a threat towards these areas. As mentioned in the findings for criteria 2.1.1 it is likely that a large number of smaller areas or biotopes of local or regional importance to biodiversity or as species habitats, in a Danish context called Key Biotopes ("nÃ,glebiotoperâ€), which are not systematically identified and mapped.

The risk mitigation measures covering all four indicators are targeting both:

- a) Forest operations controlled by The BP and performed by forest contractors, and
- b) Forest operations where The BP receives the wood chips from suppliers with indirect control of the forest operations. Risk mitigation measures:

For each new project, i.e. assignment to purchase roundwood or wood chips, a risk assessment is carried out with screening of the forest of origin from where biomass is harvested. This screening is conducted to clarify whether the site on the basis of the indicators: 2.1.1, 2.1.2, 2.2.3, 2.2.4, has to be classified as a risk area.

The assessment is based on available national maps and databases accessible on internet or via a nature portal maintained by the Danish authorities, as well as a physical examination of the forest area before the forest operation is started. The screening and the resulting implementation of the risk mitigation measures contribute to minimizing any negative impacts on ecosystems, biodiversity and conservation areas and thereby converted the risk into low risk. The procedure for mapping and checking the forest area, where the feedstock will be harvested includes the following;

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developed a guide to Danish contractors and suppliers on how they must screen the forest or landscape area before any harvest operations and how to use the Tradenda app. The guide includes the obligatory desk based and field screening to be performed and how the results must be made available to the company, so that the company will hold records proving implementation of risk mitigation measures securing low risk of negative impact on nature values.

Monitoring of implementation of the risk mitigation measures: The BP has prepared and implemented a monitoring plan by sampling of the suppliers of Roundwood and wood chips respectively, which include clear sampling rules and how to monitor that the required mitigation measures are being implemented, records are being kept and whether the measures were shown to be effective in addressing the identified risks. The review of the lead auditor included checking forest operation sites, interviewing contractors of the suppliers, checking training programme implemented and checking the Tradenda app information and examples of maps with known nature values, project work instructions, documentation and company evaluation.

Denmark

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

As this Indicator is seen as being partially covered by Indicators 2.1.1 and 2.1.2, for which low risk must be demonstrated or reached through mitigating measures. The risk for this Indicator is also assessed as Specified.

The risk mitigation measures covering all four indicators are targeting both:

- a) Forest operations controlled by The BP and performed by forest contractors, and
- b) Forest operations where The BP receives the wood chips from suppliers with indirect control of the

forest operations. Risk mitigation measures:

For each new project, i.e. assignment to purchase roundwood or wood chips, a risk assessment is carried out with screening of the forest of origin from where biomass is harvested. This screening is conducted to clarify whether the site on the basis of the indicators: 2.1.1, 2.1.2, 2.2.3, 2.2.4, has to be classified as a risk area.

The assessment is based on available national maps and databases accessible on internet or via a nature portal maintained by the Danish authorities, as well as a physical examination of the forest area before the forest operation is started. The screening and the resulting implementation of the risk mitigation measures contribute to minimizing any negative impacts on ecosystems, biodiversity and conservation areas and thereby converted the risk into low risk. The procedure for mapping and checking the forest area, where the feedstock will be harvested includes the following;

- 1) Each project is assigned a unique project ID that recur in the short, job description, weight slips and invoices etc.
- 2) Site map developed based on relevant map applications, incl. "Arealinformation" and "Miljøgis" with HNV (high nature value) forest or DM & E map program with relevant map layers (Map and detailed maps indicating the workspace and protected zones, if any, FSC and PEFC certified FMUs and/or green forest management plan involved "account card" in the planning process, so of values can be secured. These cards attached to the project).

- 3) Completion of checklist: a) Map Screening, the affected items in the checklist ticked; b) description of any remedial action; c) definition of product status; d) presentation of the person responsible for screening; e) Physical screening / review of the felling area to be implemented by Broadleaf stands; f) Uneven Aging stands; g) Areas with HNV value from 10 and up and h) Areas of Conservation, monuments, etc.
- 4) Physical screening with identifying any key habitats and valuable nature areas.
- 5) Physical screening may be omitted if the screening of existing maps and databases does not reveal any risks and the forest operation is: a) thinning of afforestation / 1st generation forest site; b) thinning in even-aged coniferous forest stand, c) the work area is outside the forest and the operation performed is not impacting any nature values.
- 6) For each project, a work instruction is prepared, which describes how the forest operation/task is to be solved and which measures must be taken on site.

The SVP and implemented training programme: The BP has developed and implemented a SVP including a training programme of forest contractors/suppliers of feedstock. The suppliers have been listed and categorised and a contractors handbook developed, which clearly explains how the suppliers/contractors are screened and trained, as well as how the supplier/contractor have to apply the work instruction and maps resulting from the screening of the individual forest area. The BP then controls that the supplier/contractor

has implemented the screening, the mapping, the work instruction and the forest operation without negative impact on any nature values on site. Next to the contractor handbook, The BP has developed a Tradenda app, where all information is available and shared between The BP and the supplier/contractor.

Guide to perform the screening of the forest area before forest operations: The company has developed a guide to Danish contractors and suppliers on how they must screen the forest or landscape area before any harvest operations and how to use the Tradenda app. The guide includes the obligatory desk based and field screening to be performed and how the results must be made available to the company, so that the company will hold records proving implementation of risk mitigation measures securing low risk of negative impact on nature values.

Monitoring of implementation of the risk mitigation measures: The BP has prepared and implemented a monitoring plan by sampling of the suppliers of Roundwood and wood chips respectively, which include clear sampling rules and how to monitor that the required mitigation measures are being implemented, records are being kept and whether the measures were shown to be effective in addressing the identified risks. The review of the lead auditor included checking forest operation sites, interviewing contractors of the suppliers, checking training programme implemented and checking the Tradenda app information and examples of maps with known nature values, project work instructions, documentation and company evaluation.

Non-conformities and observations

NC number NC-000124	NC Grading: Observation	
Standard:	SBP Standard 2: Verification of SBP-compliant Feedstock	
Requirement:	1 Background	
Description of Non-conformanc	e and Related Evidence:	
The BP has two sets of suppliers: 1) contractors directly working under own staff and 2) other contractors/suppliers, which again is subdivided according to the suppliers forestry educational levels. During the audit, the BP explained that they are also considering to start purchasing secondary wood chips from sawmills as a third set of suppliers. This observation is issued to remind the BP of the requirement to include all suppliers and supplies under the SVP and the defined mitigation measures.		
Timeline for Conformance:	N/A	
Evidence Provided by Company to close NC:	N/A	
Findings for Evaluation of Evidence:	N/A	
NC Status:	N/A	

8 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):	Jyrki Sopanen	
Date of decision:	07 Apr 2021	
Other comments:	N/A	