



Supply Base Report: Brüning Group Germany GmbH

First Surveillance Audit

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Completed in accordance with the Supply Base Report Template Version 1.3

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

Document history

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1 Overview

Producer name: Brüning Group Germany GmbH

Producer location: Landstraße 30, D-28870 Fischerhude

Geographic position: 53.115398, 9.052471

Primary contact: Hendrik Bauer, +49 4293 7894159, hendrik.bauer@bruening-gruppe.de

Company website: www.bruening-gruppe.de

Date report finalised: 02.12.2020

Close of last CB audit: 09.12.2020

Name of CB: Preferred by Nature , formerly NEPCon

Translations from English: Yes

SBP Standard(s) used: Standard 2 version 1.0 (March 2015)
Standard 4 version 1.0 (March 2015)
Standard 5 version 1.0 (March 2015), incl. 5E (Nov 2019)

Weblink to Standard(s) used: <https://sbp-cert.org/documents/standards-documents/standards>

SBP Endorsed Regional Risk Assessment: Supply Base Evaluation (SBE) not included

Weblink to SBE on Company website: <https://www.bruening-gruppe.de/gruppe/das-unternehmen/auszeichnungen-zertifikate.html>

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2 Description of the Supply Base

2.1 General description

Brüning-Holding and its subsidiaries is a biomass trading company based in northern Germany. The focus of the business is on purchasing and selling wood-based raw materials and products.

Brüning-Holding owns the following subsidiaries, which are relevant in the following scope of SBP:

- Brüning Group Germany GmbH & Brüning Group Danmark ApS

Brüning Group Germany GmbH is mainly a producer of certified wood chips but also a trader of certified wood pellets:

- Woodchips: All, 100% of the primary feedstock for the production of Brüning Group Germany's wood chips is sourced from Germany AND is either FSC or PEFC certified. For a clear separation of different products and certification claims, Brüning Group Germany's transports are carried out exclusively with uniform (either certified or uncertified - never both at the same time) material – mixing is prohibited.
- Wood pellets, certified wood pellets are also traded, in the sense of the transfer control system.

The scope for this Supply Base Report is Brüning Group Germany who apply the SBP system for trading certified wood pellets or wood chips, OR for producing wood chips on basis of FSC or PEFC certified primary feedstock with origin in Germany.

With regard to the European Union Timber Regulation (EUTR), Brüning-Holding is defined as an “operator” for placing timber on the European Union market. To meet the requirements of excluding legally harvested and legally traded timber, Brüning-Holding have its own in-house due diligence system.

Supply base Germany

Brüning Group Germany GmbH considers all of Germany as its supply base and source: Different species of larch (*Larix decidua*, *Larix kaempferi* and *Larix x eurolepis*), Silver fir (*Abies alba*) and Spruce (*Picea abies*).

In Germany, Brüning Group Germany has 5-10 suppliers, whom supply either FSC or PEFC certified feedstock in terms of the scope of SBP Standard 2.

Brüning Group Germany GmbH purchases materials with the following claims:

- FSC 100% certified
- 100% PEFC certified

In Germany, approximately 12,6% of the forest area (currently approx. 1.44 million ha) is FSC-certified¹. Whereas with currently approx. 7.8 million ha approximately 68% of the German forest area is PEFC-certified².

Forest cover of Germany

- 11.4 mill ha's (32% of the national territory in total)³. Over 98% of the forests are open to the public, 2% are not accessible, for example, due to prohibition of access or dangerous terrain conditions.
- After agriculture, forestry is the most important form of land use in Germany

¹ <https://www.pefc.org/discover-pefc/facts-and-figures>

² <https://cdn.pefc.org/pefc.org/media/2020-11/8741c753-16a6-4a55-b401-68511abad8ea/1ff27439-a5a0-5105-a65f-e29a8e4b7e81.pdf>

³ https://www.bmel.de/SharedDocs/Downloads/EN/Publications/ForestsInGermany-BWI.pdf?__blob=publicationFile

- 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
- Spruce, pine, beech and oak cover a total of 73% of German forests. The species dominate in the forests of Germany⁴:
 - Spruce, covering approx. 2.8 mill ha's (26% of the forest area)
 - Pine covers approx. 2.4 mill ha's (22% of the forest area)
 - Beech covers approx. 1.7 mill ha's (15% of the forest area)
 - Oak covers approx. 1.1 mill ha's (10% of the forest area)

Woody biomass show up different value of humidity, i.e. dry and humid forests, different structures, i.e. open canopy (typically younger) vs. closed canopy (typically older) and different sizes. For climatic classification, forests are mainly divided into boreal, temperate and tropical forests. For Germany, the temperate forest is the predominant forest classification and is located between the tropical and boreal regions⁵:

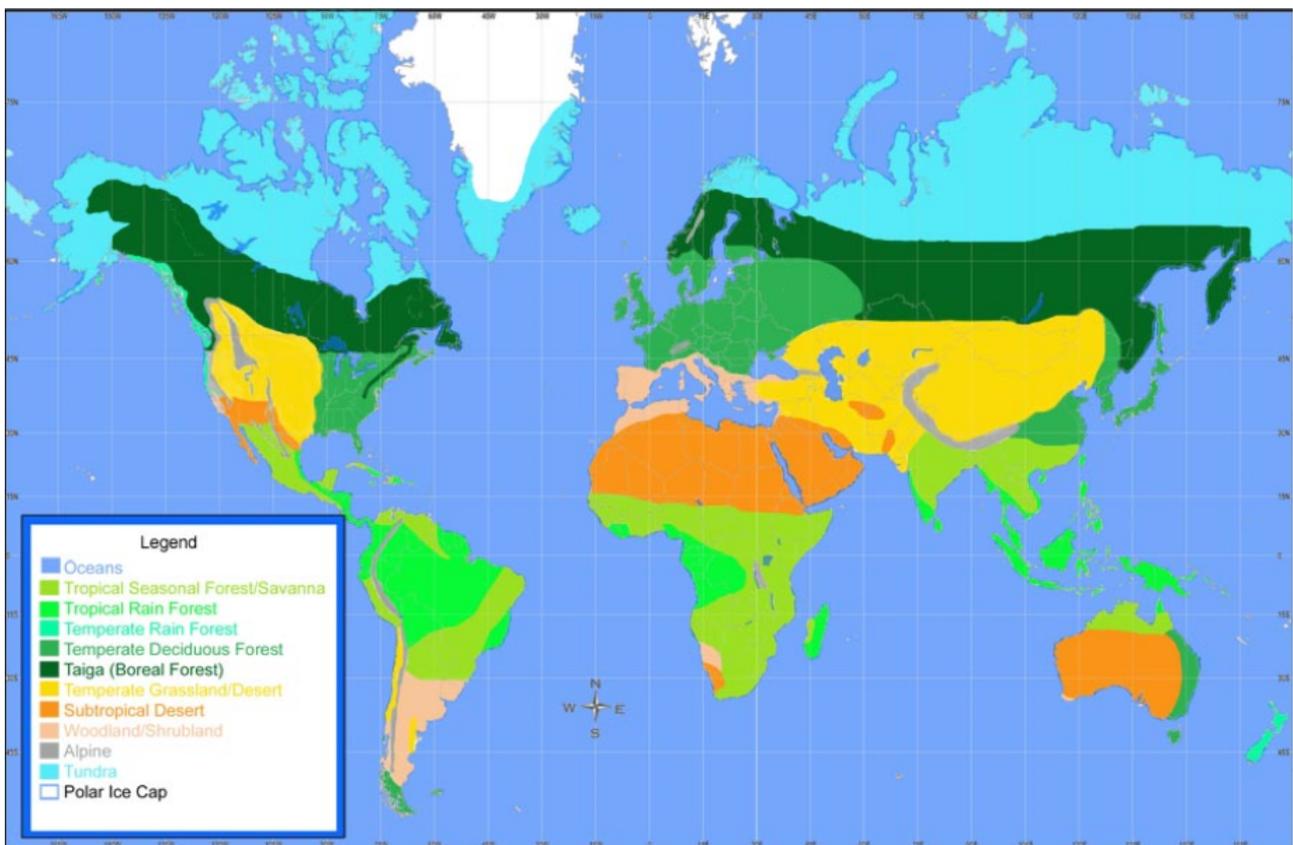


Figure 1: Forest Classification⁶

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

⁴ https://www.bmel.de/SharedDocs/Downloads/Broschueren/Bundeswaldinventur3.pdf?__blob=publicationFile

⁵ https://www.cbd.int/forest/doc/forest-gap-analysis_2009_2nd%20ed.pdf

⁶ <http://w3.marietta.edu/~biol/biomes/biomemap.htm>

forest area size of 5 ha's, that are frequently spread over several smaller areas.

Almost all forests in Germany are managed forests by around 2 million forest owners⁷:

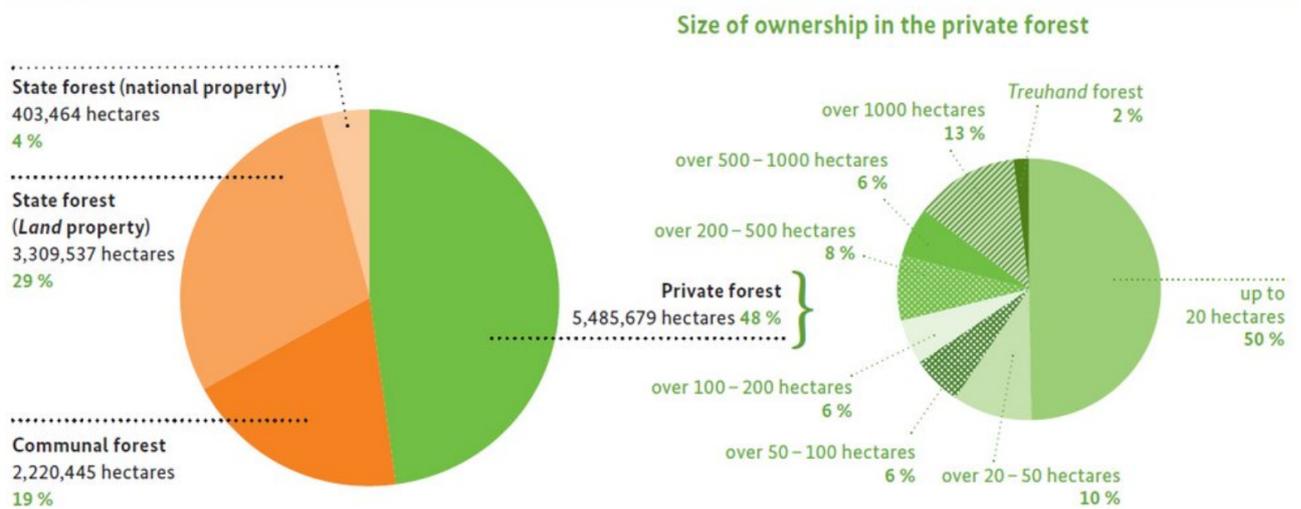


Figure 2: Federal Ministry of Food and Agriculture (BMEL)⁸

As can be seen above, 48% of the 11.4 million hectares of forest in Germany are private forests, i.e. privately owned. Only 29% of the forests are owned by the Länder (State forest – land property), 19% is Communal forest and 4% is state forest (national property). About half of the privately owned forests are used by holdings with less than 20 hectares of land. Only 13% of the private forests belong to holdings with a size of over 1,000 hectares.

The ownership structure has developed differently in Germany in the course of history and from region to region.

- Mixed stands cover 76% of the forest area⁹
- Multiple storied forest stands cover 68% of the forest area
- Natural rejuvenation is used on 85% of the forest area and young stands cover 25% of the forest area.
- 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%)
- Annual harvest represents 62.5% of annual increment in German forests
- Both total standing timber volume and the total forest cover is increasing in Germany
- Annual increment in German forests: An average of 11.2 m³ per ha and year. In total 121.6 mill m³ per year
- Annual harvest from German forests: An average of 7 m³ per ha and year. In total 76 mill m³ raw timber per year

⁷ <https://www.cepf-eu.org/page/germany>

⁸ <https://www.bundeswaldinventur.de/en/third-national-forest-inventory/germany-the-land-of-forests-forest-area-unchanged/the-forests-mainly-privately-owned/>

⁹ <https://www.bundeswaldinventur.de/en/third-national-forest-inventory/the-forest-habitat-more-biological-diversity-in-the-forests/spruce-pine-beech-oak-the-most-common-tree-species/>



Figure 3: Federal Agency for Nature Conservation (BfN)¹⁰

The German forests are predominantly coniferous forests (54%), but the deciduous (31%) and mixed forests (13%) would dominate as a natural forest species due to their characteristics without human intervention. However, the high proportion of pure coniferous forest must be viewed very critically with regard to climate change and biodiversity, as coniferous forest is very unlikely to adapt to temperature changes and other consequences of climate change.

¹⁰ <https://www.bfn.de/en/service/facts-and-figures/the-utilisation-of-nature/forestry-and-forests/types-of-forest.html>

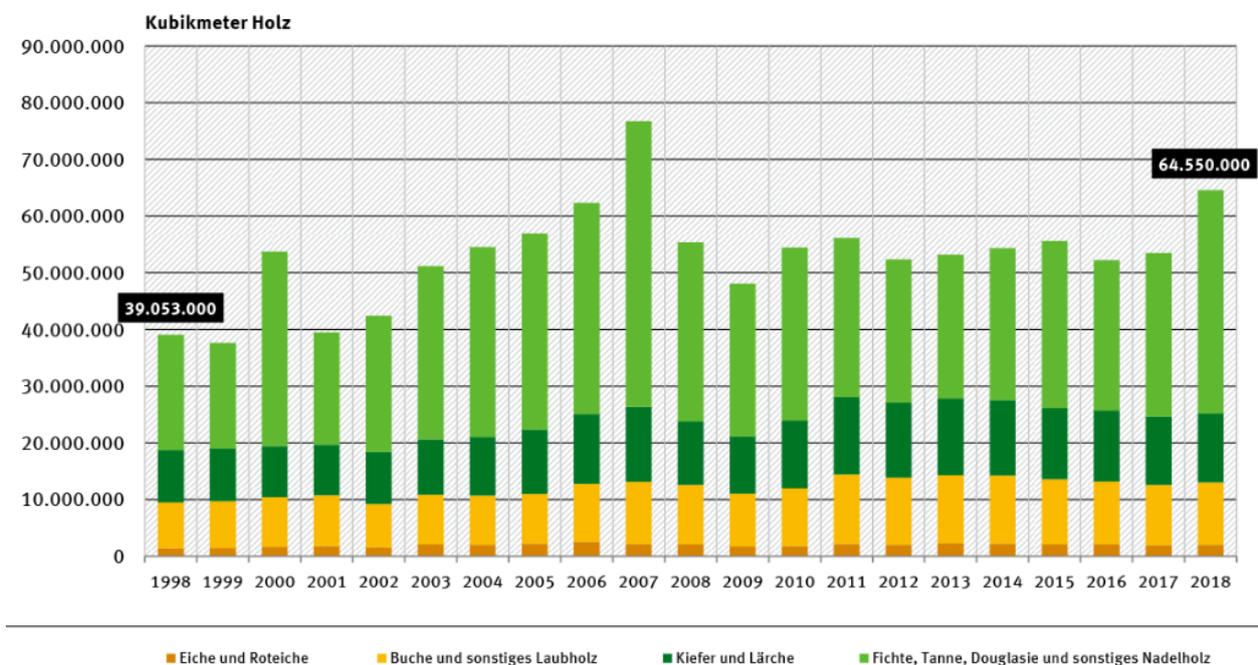
Timber logging in Germany

In 2018, a total of 64.6 million cubic metres (million m³) of wood (without bark) were felled. This means that logging in 2018 was significantly higher than in the years 2008 to 2017. The higher felling can be attributed, among other things, to an increased forced use due to storm, drought and increased bark beetle infestation; the proportion of damaged wood in 2018 was around 49% or 31,9 million m³.¹¹

List of Timber cutting by type of timber/ timber assortment in germany 2017 and 2018 (see Figure 4c).

80% of total logging was coniferous such as spruce, fir, Douglas fir, pine and larch, 17% beech and other hardwoods and only about 3% oak and red oak. About 45 % of the felling took place in the private forest, 35% in the state forest and 19% in the corporate forest". Only about 1% of the timber was harvested in the federal forest. This means that Germany occupies one of the top places in a European comparison as far as round and sawn timber production is concerned¹².

Overview of logged timber in total (period 1998-2018):



* 1998-2001: Berichtszeitraum war das Forstwirtschaftsjahr (Oktober des Vorjahres bis September des angegebenen Jahres)
* ab 2002 erfolgte die Umstellung auf das Kalenderjahr

Quelle: Statistisches Bundesamt 2019; Forstwirtschaftliche Bodennutzung - Holzeinschlagstatistik 2018. Fachserie 3, Reihe 3.3.1; Statistisches Bundesamt, Genesis Datenbank, Statistik 41261.

Figure 4a: German Environment Agency (UBA)¹³

(Rot-)Eiche: (red) Oak ; Buche/Laubholz: Beech/deciduous forest ; Kiefer/Lärche: Pine/Larch ; Fichte/Tanne/Douglasie/sonst. Nadelholz: Spruce/Fir/Douglas fir/other coniferous forest

The proportion of the energy assortment from the German forest have been relatively stable at around 15-20%, figure 4b¹⁴

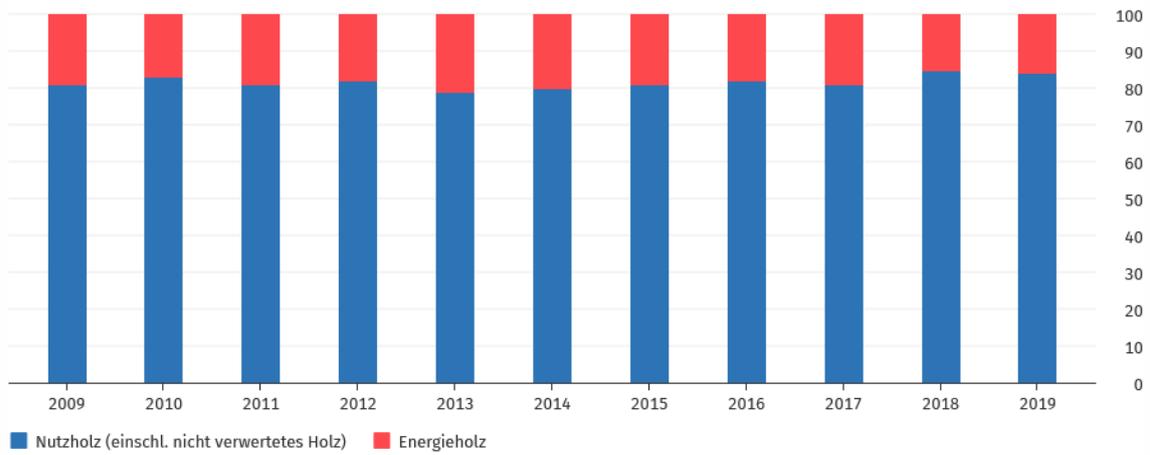
¹¹ <https://www.destatis.de/DE/Themen/Branchen-Unternehmen/Landwirtschaft-Forstwirtschaft-Fischerei/Wald-Holz/inhalt.html>

¹² <https://www.destatis.de/EN/Themes/Economic-Sectors-Enterprises/Agriculture-Forestry-Fisheries/Forestry-Wood/Tables/timber-cutting.html>

¹³ <https://www.umweltbundesamt.de/daten/land-forstwirtschaft/forstwirtschaft#textpart-1>

¹⁴ <https://www.destatis.de/DE/Themen/Branchen-Unternehmen/Landwirtschaft-Forstwirtschaft-Fischerei/Wald-Holz/aktuell-holzeinschlag.html>

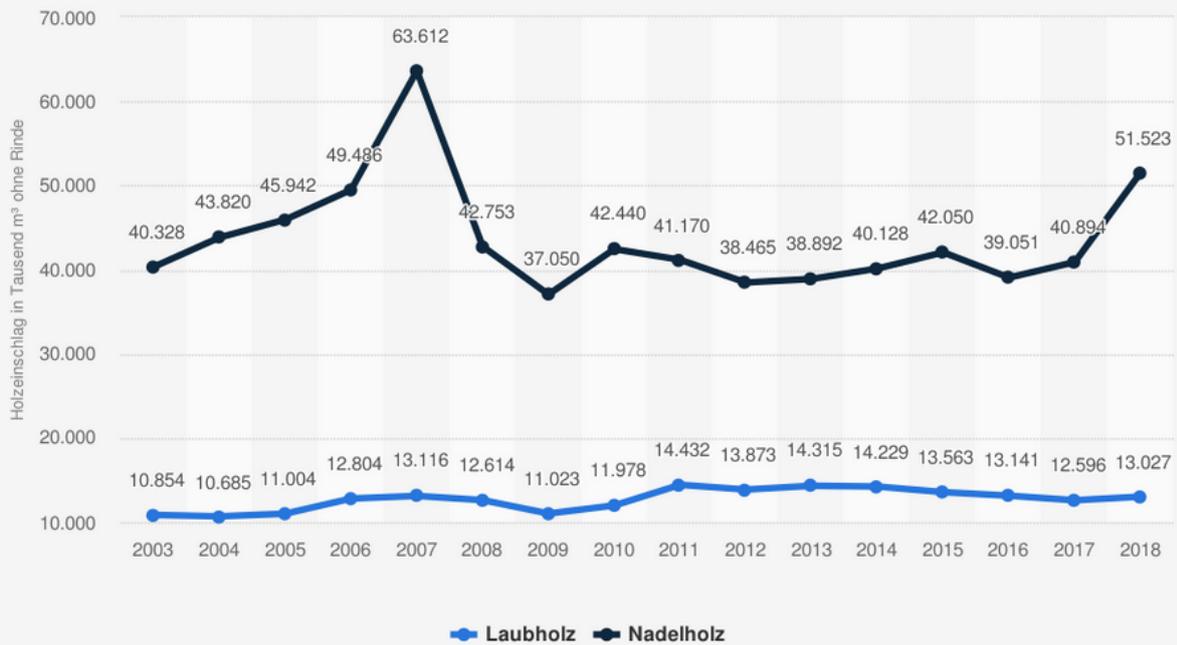
Holzeinschlag nach Nutzung des Holzes
in %



© Statistisches Bundesamt (Destatis), 2020

Figure 4b Logging percent as function of use of the wood

Holzeinschlag in Deutschland nach Holzart (Laub- und Nadelholz) in den Jahren 2003 bis 2018 (in 1.000 m³ ohne Rinde)



Quelle
Statistisches Bundesamt
© Statista 2019

Weitere Informationen:
Deutschland

Figure 4c Figures in timber harvesting by type

National forest policy¹⁵

Germany's Forest policies defines 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 2020¹⁶. 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.

¹⁵ https://www.bmel.de/SharedDocs/Downloads/EN/Publications/WaldberichtkurzEN.pdf?__blob=publicationFile

¹⁶ https://www.bmel.de/SharedDocs/Downloads/EN/Publications/ForestStrategy2020.pdf?__blob=publicationFile

Socio economic setting¹⁷

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 sector¹⁸

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 25,000 companies.

¹⁷ <https://www.forstwirtschaft-in-deutschland.de/index.php?id=96&L=1>

¹⁸ <https://www.forstwirtschaft-in-deutschland.de/index.php?id=96&L=1>

CITES

The Convention on International Trade in Endangered Species of Wild Fauna and Flora – CITES was decided 1973 in view of the dramatic decline of many types by poaching and trade. Germany was one of the first signatories, and also the first EU state. Internationally, CITES came into force in 1975. Already one year later in 1976 the regulations were implemented in Germany.

CITES Annex:

- Annex 1 describes the already endangered species. Trade is generally prohibited. Exceptions are only possible under very narrow conditions.
- Annex 2 describes the species covered are not yet threatened with extinction but are potentially vulnerable to trade. Here, the Convention permits trade if it is sustainable.
- Annex 3 describes species whose export should be controlled more closely.

CITES habitat species are present in Germany but don't include deciduous (broadleaf species) trees or softwood which are threatened, therefore Brüning-Holding can exclude the trade of these species.

The IUCN (International Union for Conservation of Nature and Natural Resources) is an international non-governmental organisation. Its aim is to sensitise human societies to nature and species conservation and to influence them in such a way as to ensure the sustainable and careful use of resources. IUCN draws up the Red List of Endangered Species and categorises protected areas through the World Commission on Protected Areas. The IUCN also publishes numerous papers on environmental and nature conservation issues and develops international standards.

Germany has a number of IUCN categories, covering the following categories¹⁹:

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

¹⁹ <https://www.iucnredlist.org/>

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

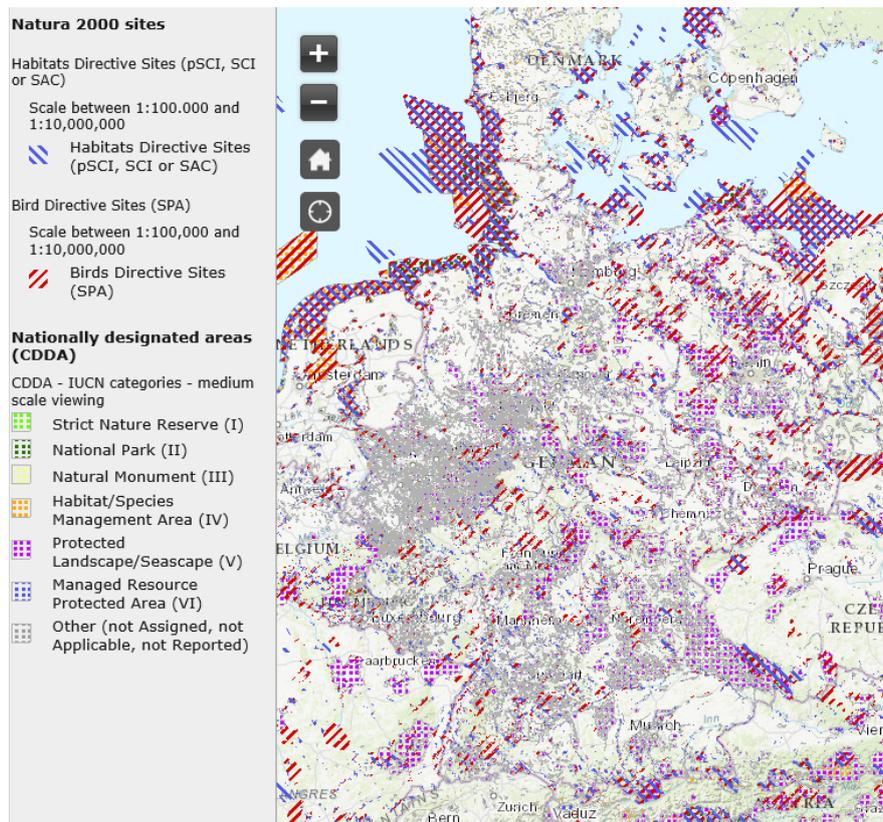


Figure 5: Natura 2000²⁰

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.

- 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

²⁰ https://ec.europa.eu/environment/nature/natura2000/data/index_en.htm

Overview of sources / references:

German Environment Agency (UBA):

<https://www.umweltbundesamt.de/daten/land-forstwirtschaft/forstwirtschaft#textpart-1>

Federal Ministry of Food and Agriculture (BMEL):

<https://www.bundeswaldinventur.de/en/third-national-forest-inventory/germany-the-land-of-forests-forest-area-unchanged/the-forests-mainly-privately-owned/>

Federal Ministry for Environment, Nature Conservation and Nuclear Safety (BMU):

<https://www.bmu.de/themen/natur-biologische-vielfalt-arten/artenschutz/internationaler-artenschutz/cites/>

Forestry in Germany

<https://www.forstwirtschaft-in-deutschland.de/index.php?id=96&L=1>

European Environment Agency (EEA):

<https://www.eea.europa.eu/data-and-maps/explore-interactive-maps/european-protected-areas-1>

Federal Statistical Office (Destatis):

<https://www.destatis.de/EN/Themes/Economic-Sectors-Enterprises/Agriculture-Forestry-Fisheries/Forestry-Wood/Tables/timber-cutting.html>

Federal Agency for Nature Conservation (BfN):

<https://www.bfn.de/en/activities/red-list/rl-biotoptypen.html>

<https://www.bfn.de/en/service/facts-and-figures/the-utilisation-of-nature/forestry-and-forests/types-of-forest.html>

FSC Germany:

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

PEFC Germany:

<https://cdn.pefc.org/pefc.org/media/2020-11/8741c753-16a6-4a55-b401-68511abad8ea/1ff27439-a5a0-5105-a65f-e29a8e4b7e81.pdf>

The IUCN Red List Categories and Criteria:

<https://www.iucnredlist.org/>

Natura 2000:

<https://natura2000.eea.europa.eu>

https://ec.europa.eu/environment/nature/natura2000/data/index_en.htm

Forest Classification:

<http://w3.marietta.edu/~biol/biomes/biomemap.htm>

2.2 Actions taken to promote certification amongst feedstock supplier

Brüning-Holding holds the Chain of Custody Systems for both FSC and PEFC, managed by a transfer system within physical separation. The reason for this is that customer demand for either FSC or PEFC certified material is growing.

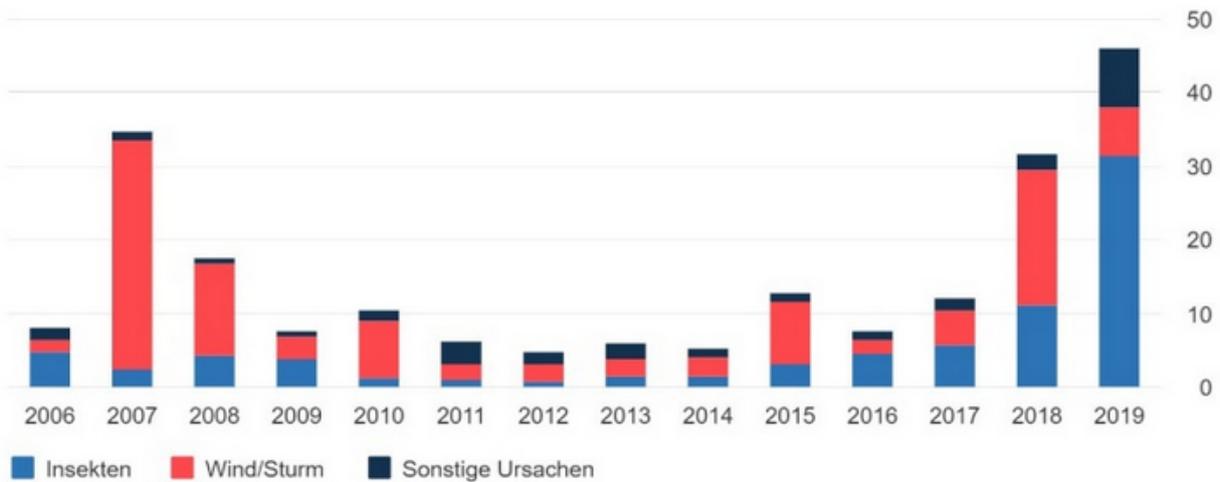
All suppliers and forest owners are strongly encouraged to engage into the FSC or PEFC certification schemes and concomitantly to support sustainable forest management.

2.3 Final harvest sampling programme

Due to the more extreme climate conditions, more and more deadwood is being found, which, among other things, has been removed from the forest due to beetle infestation. Older trees are thus removed from the forest and cannot be processed in the timber industry.

Durch Schäden bedingter Holzeinschlag nach Ursache

in Millionen Kubikmeter



© Statistisches Bundesamt (Destatis), 2020

Figure 6 Logging caused by damage

2.4 Flow diagram of feedstock inputs showing feedstock type [optional]

Not applicable

2.5 Quantification of the Supply Base

Supply Base

- a. Total Supply Base area (ha):
Germany: 11.400.000 ha
- b. Tenure by type (ha):
Germany:
 - 7.70 million ha privately owned
 - 3.70 million ha public
- c. Forest by type (ha): boreal/temperate/tropical
 - temperate forest type (Germany): 100%
- d. Forest by management type (ha):
 - managed natural: 100%
- e. Certified forest by scheme (ha):
Germany: 7,76 million ha of PEFC-certified forest and 1,44 million ha of FSC-certified forest

Feedstock

- f. Total volume of Feedstock: tonnes or m³: 0 – 200.000 m³
- g. Volume of primary feedstock: tonnes or m³ - 0 – 200.000 m³
- h. List percentage of primary feedstock (g), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
 - 100 % certified to an SBP-approved Forest Management Scheme (FSC or PEFC)
- i. List all species in primary feedstock, including scientific name
 - larch (*Larix decidua*, *Larix kaempferi* and *Larix x eurolepis*)
 - Silver fir (*Abies alba*)
 - Spruce (*Picea abies*)
- j. Volume of primary feedstock from primary forest
 - none
- k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
 - none
- l. List percentage of primary feedstock from secondary forest:
 - 100% of the primary materials from secondary forest
(100% FSC certified feedstock and/or 100% PEFC certified feedstock)
- m. Volume of tertiary feedstock: specify origin and composition
 - none

Disclosure of the exact figures would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. Volumes are sensitive as they may give competitors and idea about capacity, resources and market share.

Bands for (f) and (g) are:	Bands for (h), (l) and (m) are:
1. 0 – 200,000 tonnes or m ³	1. 0%-19%
2. 200,000 – 400,000 tonnes or m ³	2. 20%-39%
3. 400,000 – 600,000 tonnes or m ³	3. 40%-59%
4. 600,000 – 800,000 tonnes or m ³	4. 60%-79%
5. 800,000 – 1,000,000 tonnes or m ³	5. 80%-100%
6. >1,000, 000 tonnes or m ³	Percentage values to be calculated as rounded-up integers.

NB: Percentage values to be calculated as rounded-up integers.

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
<input type="checkbox"/>	X

Brüning Group Germany only utilizes wood which according to SBP Standard 2 part 8.2 is exempt from a Supply Base Evaluation (SBE). Brüning Group Germany utilizes feedstock purchased with a FSC 100% or 100% PEFC claim.

4 Supply Base Evaluation

4.1 Scope

Not applicable

4.2 Justification

Not applicable

4.3 Results of Risk Assessment

Not applicable

4.4 Results of Supplier Verification Programme

Not applicable

4.5 Conclusion

Not applicable

5 Supply Base Evaluation Process

Not applicable

6 Stakeholder Consultation

All feedstock originate from SBP-approved Forest Management Scheme for primary feedstock. On this basis a Supply Base Evaluation hasn't been conducted.

The SBR has been made publicly available 30 days before initial audit.

6.1 Response to stakeholder comments

Not applicable

7 Overview of Initial Assessment of Risk

Not applicable, as a risk assessment was not required.

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

Not applicable

8.2 Site visits

Not applicable

8.3 Conclusions from the Supplier Verification Programme

Not applicable

9 Mitigation Measures

9.1 Mitigation measures

Not applicable

9.2 Monitoring and outcomes

Not applicable

10 Detailed Findings for Indicators

Not applicable

11 Review of Report

11.1 Peer review

Anders Bjørnkjær-Nielsen, Master of forestry, Consultant for forestry certification, has read this report and carefully checked its contents. Anders Bjørnkjær-Nielsen accepts no responsibility or liability for the accuracy of the information included in this report.

11.2 Public or additional reviews

The certification body reviews the SBR in every audit.

This First Surveillance Report was also made publicly available by Brüning Group Germany GmbH on the company's website.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report prepared by:	<i>Hendrik Bauer</i>	<i>Certification Manager</i>	<i>02.12.2020</i>
	Name	Title	Date
<p>The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.</p>			
Report approved by:	<i>Arnd Brüning</i>	<i>CEO</i>	<i>02.12.2020</i>
	Name	Title	Date
Report approved by:	<i>Jan Wunderlich</i>	<i>Senior Management</i>	<i>02.12.2020</i>
	Name	Title	Date

13 Updates

Once a year prior to the external audit, Brüning will carry out self-regulatory control.

For the present reporting period, this review was carried out as part of an internal audit. Any changes or findings are listed below:

13.1 Significant changes in the Supply Base

No changes in the Supply Base by 01.12.2020

13.2 Effectiveness of previous mitigation measures

Not applicable

13.3 New risk ratings and mitigation measures

Not applicable.

13.4 Actual figures for feedstock over the previous 12 months

1. 0 – 200.000 tonnes or m³

13.5 Projected figures for feedstock over the next 12 months

1. 0 – 200.000 tonnes or m³

Disclosure of the exact figures would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. Volumes are sensitive as they may give competitors and idea about capacity, resources and market share.

Bands are:
1. 0 – 200,000 tonnes or m ³
2. 200,000 – 400,000 tonnes or m ³
3. 400,000 – 600,000 tonnes or m ³
4. 600,000 – 800,000 tonnes or m ³
5. 800,000 – 1,000,000 tonnes or m ³
6. >1,000, 000 tonnes or m ³