



Control Union Certifications B.V. Evaluation of Delitimbers, Lda. Compliance with the SBP Framework: Public Summary Report

Scope Change 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

Document history

Version 1.0: published 26 March 2015

Version 1.1: published 30 January 2018

Version 1.2: published 4 April 2018

Version 1.3: published 10 May 2018

Version 1.4: published 16 August 2018

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1 Overview

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Current report completion date: 26/Mar/2021

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Name of the Company: Delitimers, Lda.

Company contact for SBP: Francisco Silva Gomes, francisco.silvagomes@gmail.com

Certified Supply Base: Portugal

SBP Certificate Code: SBP-06-48

Date of certificate issue: 12/Jan/2021

Date of certificate expiry: 11/Jan/2026

This report relates to the Scope Change Audit

2 Scope of the evaluation and SBP certificate

Scope of evaluation: Surveillance evaluation to assess the CH's conformance to SBP 1, 2, 4, and 5 and respective Instruction Notes and Documents for use in wood pellet production, at Delitimbers production site in Proença-a-Nova, Portugal, and the port facilities at Figueira da Foz, Portugal, as well as evaluation of mitigation measures implemented for primary feedstock under the SBE (including inspection of primary feedstock suppliers). Adding trading activity to the scope was granted 31.03.2021

Scope of certificate: The following SBP standards are applicable and form the scope of the evaluation and thus, the SBP certificate: Standard 1, Standard 2, Standard 4 and Standard 5. This certificate covers Production of pellets in Proença-a-Nova and trading of pellets, Portugal. Supply Base Evaluation is included in the scope of the evaluation. The scope includes communication of Dynamic Batch Sustainability Data.

SBP certificate: SBP-06-48

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, including requirements designated in applicable SBP Standards and Instruction Documents;
- Review of the production processes, production site visit;
- Review of the updated Supply Base Report;
- Review of the risk assessment results;
- Review of SBP system control points, analysis of the existing FSC CoC system;
- Evaluation of mitigation measures implemented for primary feedstock (including inspection of primary feedstock suppliers);
- Review of the records, calculations and conversion factors;
- GHG data collection analysis
- Interviews with responsible staff;
- Review of the records

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

Not applicable.

5 Description of Company, Supply Base and Forest Management

5.1 Description of Company

Delitimers, Lda. (DLT) is a pellet production company located nearby the village of Proença-a-Nova in Portugal and trader of pellets. Proença-a-Nova is located near to the city of Castelo Branco. DLT buys low-quality primary feedstock from dozens of suppliers and secondary feedstock from around 5 sawmills. Some feedstock suppliers are FSC certified but not all deliver the feedstock with an FSC claim. Primary feedstock accounts for approximately 95% of total feedstock supply (ca. 40% SBP-compliant primary feedstock, 59% SBP-controlled primary feedstock, 1% SBP-complaint secondary feedstock).

DLT has a production capacity of 120,000 tons of wood pellets per year. Considering the total amount of feedstock it processes, DLT shall be one of the largest companies in the center of Portugal, after a pulp and paper company. This activity contributes to the regional economy and to effective forest fire fighting – the main issue in Portuguese forestry today.

The supply base is Continental Portugal.

Although the Supply Base consists of whole Portugal, presently DLT is procuring wood from the central regions of Portugal, namely from the districts:

- Castelo Branco
- Santarém
- Coimbra
- Portalegre
- Leiria
- Guarda

5.2 Description of Company's Supply Base

Climate change, the occurrence of extreme meteorological events, in combination with large areas of insufficiently managed forests (especially eucalypt forests) has increased the phenomenon of devastating forest fires. Portugal accounts for the largest and the most forest fires in Europe. Climate change may also induce pests and diseases due to stress in host plants. In Portugal, phytosanitary problems affect mainly the cork oak and holm oak, showing its decline. The loss of vitality and the mortality of maritime pine is mainly related with the Wood Pine Nematode (WPN), detected in Portugal since 1999.

The forestry industry of Portugal is vertically integrated to derive maximum economic benefit from the three main forest tree species – maritime pine, eucalypt and cork oak. Maritime pine and eucalypt dominate the timber-producing regions. Forests of cork oak are generally multifunctional.

Goods produced by way of forestry activities sustain an important industrial chain based on natural resources that in turn supports a strong export sector. Portugal, therefore, considers forests and forestry products as an area of crucial importance to its economy. The forest sector has a significant impact on its GDP. Forest sector products contribute to around 10% of the national export. Forests are also the base of an economic sector which generates around 100.000 jobs (4% of the employable population).

In Portugal the eucalyptus wood consumption was around 7.7 million m³ (according CELPA / 2018 data) and pinewood was 4.21 million m³ (according data from Centro Pinus / 2019). The total wood raw material national consumption was 11.91 million m³.

The raw material consumption in Delitimers for pellet production was less than 1% of the national wood consumption.

Delitimers supply area is mainland Portugal and the adjacent border is Spain.

Delitimers proportions SBP feedstock products groups are expected to be 100% FSC® Controlled Wood and SBP- Controlled Feedstock; around 40% of SBP-compliant Primary Feedstock, all species received are identified in 2.5. The proportions species were: Eucalyptus spp. – 17%; Acacia spp. – 7%; Pinus pinaster – 70% ; Other species – 6%.

Delitimers Supply Base Report is available at <http://delitimers.pt/index.php?id=documentos>

5.3 Detailed description of Supply Base

Supply Base Portugal

- Total Supply Base area (ha): 3.2 million ha (forest land)
- Tenure by type (ha): Private: 3.1 million ha (97%, including 8% community managed)
- Public: 0.1 million ha (3%)
- Forest by type (ha): Temperate Forest: 3.2 million ha
- Forest by management type (ha): Plantations: 1.8 million ha
- Managed semi-natural: 1.4 million ha
- Certified forest by scheme (ha): FSC: 478 000 ha (2020)
- PEFC: 283 000 ha (2020)

A quantitative description of the supply base can be found in the company's Supply Base Report.

5.4 Chain of Custody system

The Organisation has been audited against FSC® Chain of Custody but the certificate has not yet been issued. Valid FSC system description and other documents exist. Critical control points of the FSC CoC system were evaluated also during SBP audit. The Organisation has implemented FSC credit system which is used for materials received as FSC certified, FSC Controlled wood and feedstock verified according to the Organisation's own Controlled wood verification system, covering Portugal. Feedstock whos origin cannot be verified as per the established Due Diligence system, will be considered as Non-Controlled and will not be included in the production of certified products nor supplied SBP controlled. Supplier list is maintained. After the reception, incoming feedstock is unloaded into piles according to type of feedstock and load is registered into the recordkeeping system. All input material is weighted and recorded in tonnes. For the credit account purposed the volume of feedstock is recalculated by using the conversion factor of the production, FSC credit account is updated monthly: data about received raw materials by FSC certification status and volume of sold pellets are recorded. In case of the FSC and/or SBP sales, the volume of sold pellets is withdrawn from the credit account. Based on the credit account management the proportion of the SBP-compliant and SBP-controlled biomass is calculated and all records are kept.

6 Evaluation process

6.1 Timing of evaluation activities

This SBP main audit was carried out during September 17-19 and 26, 2020. The evaluation was conducted by means of on sites visits of the on-going construction of the pellet production and office site in Proença-a-Nova, Portugal, as well as a visit to the port of Figueria da Foz and field inspection of forest properties from where feedstock could be sourced from. A Total of 4 days were used for this audit, please see more details in the table below.

This report is the result of the findings of a certification evaluation carried out by an independent lead auditor representing Control Union Certifications. The purpose of the assessment was to evaluate the compliance of the client with respect to the standards used within the scope of the certificate.

Activity	Site	Date/Time
<i>Thursday 17-09-2020</i>		
<i>Opening meeting</i>	<i>Delitimers</i>	<i>09:00-09:15</i>
<i>Agreement on Scope</i>		<i>09:15-09:30</i>
<i>Presentation company and processes and procedures</i>		<i>09:30-10:00</i>
<i>Checking the Supply Base Evaluation</i>		<i>10:00-12:30</i>
<i>Lunch break</i>		<i>12:30-13:30</i>
<i>Finalization SBE audit</i>		<i>13:30-15:30</i>
<i>Introduction into Supply Base</i>		<i>15:30-16:00</i>
<i>Supply Base report</i>		<i>16:00-16:45</i>
<i>Suppliers</i>		<i>16:45-17:00</i>
<i>Suppliers certificates</i>		<i>17:00-17:45</i>
<i>Final discussion / days closing meeting</i>		<i>17:45-18:00</i>
<i>Friday 18-09-2020</i>		
<i>Day's Opening meeting</i>	<i>Figueira da Foz</i>	<i>09:00-09:15</i>

<i>Visit at port of Figueira da Foz</i>		<i>10:45-11:30</i>
<i>Field verification of SBE</i>	<i>Sites:</i> <i>Carracosa, Sardoal.</i> <i>Reacha Cimeira, Belver.</i> <i>Parque Campismo, Penamacor</i>	<i>11:30-18:00</i>
<i>Saturday 19-09-2020</i>		
<i>Day's Opening meeting</i>		<i>09:00-09:15</i>
<i>Tour of the facility</i>		<i>09:15-10:00</i>
<i>Incoming material claims and Incoming raw material registration</i>		<i>10:00-11:00</i>
<i>Ouput Claims</i>		<i>11:00-11:45</i>
<i>Logo/Trademark use</i>		<i>11:45-12:00</i>
<i>Complaints procedures</i>		<i>12:00-12:30</i>
<i>Lunch Break</i>		<i>12:30-14:00</i>
<i>Management system overview</i>		<i>14:00-14:45</i>
<i>Chain of Custody registrations</i>		<i>14:45-16:00</i>
<i>Business integrity, social, health and safety requirements</i>		<i>16:00-17:45</i>
<i>Final discussion / days closing meeting</i>		<i>17:45-18:00</i>
<i>Saturday 26-09-2020</i>		
<i>Day's Opening meeting</i>	<i>Delitimers</i>	<i>09:00-09:20</i>
<i>GHG data registrations</i>		<i>09:20-12:30</i>
<i>Lunch break</i>		<i>12:30-13:30</i>
<i>GHG data registrations</i>		<i>13:30-15:30</i>

Report writing		15:30-16:30
closing meeting		16:30-18:00

6.2 Description of evaluation activities

The audit consisted of an opening meeting, during which the scope was confirmed. The auditor also explained the methods to be employed during the audit.

During the audit, all relevant requirements of the applicable SBP standard(s) were verified on compliance through the use of a report template and checklists, as well as interviews with the below mention individuals were made.

The audit also consisted of audits of individual suppliers and a tour of the on-going construction of the facility. First, a sampling of the suppliers took place. Control Union was evaluating how BP staff is doing audits for the suppliers and evaluating their compliance with the SBP standards and how risk from the risk assessment is implemented on the ground. Implementation of sampling for inspection of the feedstock suppliers included into Supply Base Evaluation.

The audit was completed by filling in the audit checklist and discussing the audit results. During this closing meeting it was also discussed how evidence can be submitted of corrective action with respect to non-conformities that were identified during the audit.

• Names and affiliations of people interviewed	
Name:	Affiliation:
Joana Carvalho	Delitimers
Francisco Silva Gomes	Delitimers
António Reis Camelo	Delitimers
Ricardo Curado	Delitimers
Vitor Curado	Delitimers
Eduardo Monteiro	Eurofoz
Paulo Machado	Unimadeiras
Gonçalo Varela	Unimadeiras
Hugo Gaspar	Gaspagro Florestas Lda
Mario Gaspar	Gaspagro Florestas Lda
Duarte Cavalheiro	Gaspagro Florestas Lda
Joaquim António	Pedrosa e Irmãos Lda
José Marques	Pedrosa e Irmãos Lda
Raul Dias	Pedrosa e Irmãos Lda
José Amaro	Rotaflorestal Lda
José Gonçalves	Rotaflorestal Lda

• Critical control points, summary	
Identified CCP	Evaluation CCP
Sourcing and input check	Check prior to sending the material by supplier and check upon request

Biomass production	Delitimbers provided CU with an overview of the expected quantities of biomass to be handled at the different storage, handling and trans-shipment locations within the scope of its certification. Production data is based on a theoretical analysis (production is scheduled to start in December 2020). This is documented and justified in the SAR.
Volume control	Delitimbers provided CU with an theoretical overview of the expected quantities of feedstock for each feedstock category. (production is scheduled to start in December 2020). This is documented and justified in the SAR.
Energy use - Electricity	The organization is a newly commissioned plant, production is scheduled to start in December 2020. The energy consumption has been evaluated using a theoretical evaluation based upon specific consumption of installed machinery and nominal production capacity of the plant. They receive 100% of their electricity from the grid. Separate meter is installed at the pellet plant which is the only process line.
Energy use - Diesel	The organization is a newly commissioned plant, production is scheduled to start in December 2020. The organization will monitor fossil fuel usage based on records from each time a machine fuels up on own diesel tanks by own machinery for processing or transport during production.

6.3 Process for consultation with stakeholders

Consultation with stakeholders' was conducted by the organization on 14/08/2020 for a deadline to submit comments by 13/09/2020.

Consultation with stakeholders' was conducted by Control Union on 16/08/2020 for a deadline to submit comments by 16/09/2020.

The process for stakeholder consultation consisted of sending direct email to different stakeholder categories: state institutions, local NGOs, authorities, government bodies, forest owners associations, academic and research institutions.

No comments received.

7 Results

7.1 Main strengths and weaknesses

The audit of Delitimers demonstrated a good level of compliance with the required criteria of Standard 1, 2, 4 and 5. There was reasonable evidence provided to support compliance where a Non-Conformity was not detected.

The existence of a FSC Chain of Custody system in combination with the SBP are considered a strength with respect to Futerra's overall conformity with the relevant SBP standards.

Weaknesses: Delitimers is a newly commissioned plant, production is scheduled to start in December 2020. Feedstock procurement data as well as production data was based on a theoretical analysis

Non-conformances detected during this audit.

7.2 Rigour of Supply Base Evaluation

Delitimers embarked on the development of a detailed Supply Base Evaluation which includes a clear description of their Supply Base Area. The geographical scope of the SBE is Continental Portugal. The SBE was developed in joint efforts between internal personnel and a qualified consultant, using credible data sources. Delitimers management and monitoring systems are designed to ensure compliance with applicable laws and regulations. Risk was designated low for all core Indicators, with the exception of 14 Indicators which were designated as specified risk. Delitimers has developed additional controls and mitigation measures to manage these risks. After the risk assessment was completed, mitigation measures were proposed and consulted with stakeholders. The stakeholder consultation process involved consultations to key stakeholders with regard to information on SBP certification, SBP risk assessment and supply base report, by communicating this via electronic email. As no comments were received, Delitimers has implemented the mitigation measures for the specified risk indicators as initially proposed. The risk mitigation measures have been designed and implemented planned in cooperation with acknowledged experts and external consultants in relevant fields.

7.3 Collection and Communication of Data

Delitimers is a newly commissioned plant, production is scheduled to start in December 2020. Feedstock procurement data as well as production data was based on a theoretical analysis. However, the SAR has been completed according to the standard and all data provided by the BP were verified for their consistency and accuracy.

7.4 Competency of involved personnel

Internal staff members are involved in the SBP system management and implementation. All interviewed responsible staff demonstrated awareness of their responsibilities within SBP system. The SBE was produced in a collaborative approach with inhouse staff, the sustainability manager, engineer, with 11 years experience in the wood pellet industry, and a consultant (M.Sc. in forestry; Ph.D. in forestry economics) who has around 20 years of experience in forest certification and 10 years in biomass certification. In total, he

assisted around 40 companies on SBP certification, some including SBEs in Portugal. All involved personnel, including responsible staff at suppliers and sub-suppliers have demonstrated good knowledge in relevant fields (recognition and identification of HCVF, familiarity with health and safety requirements, timber origin verification) during the site visits. Relevant certificates and diplomas were presented during the assessment and scope change audits. Qualification requirements for personnel involved in the SBE system are provided in documented procedures of the BP. In overall, auditors evaluate the competency of main responsible staff to be sufficient for implementing the SBP system with both primary and secondary material sourced within the SBE. This has been based on interviews, review of qualification documents, training records and set of procedures and documents that were composed for the SBP system as well as field observations during the assessment and audits.

7.5 Stakeholder feedback

No feedback received from stakeholders prior, during and after this annual audit.

7.6 Preconditions

The organization has been audited against FSC COC on 19/09/2019. The certificate is not yet issued.

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.

Control Union assessed the risk for each Indicator using the guidance in Section 11 of SBP Framework Standard 2: Verification of SBP-compliant Feedstock.

The risk assessment has been performed with the use of a technical expert. Determining the risk rating the likely impact of a non-compliance together with the probability of that noncompliance arising was used. and evaluated risk at both regional and the individual forest.

1.2.1= Specified risk for areas without cadastral data.

1.1.2, 1.4.1 = These legality indicators are low risk, nevertheless, DLT has procedures on verifying a few essential aspects.

2.1.1, 2.1.2 = HCV 1 and 3 are specified risk. Social and cultural aspects regarding Sustainable Forest Management are considered low risk but are checked during the evaluation of best practises.

2.4.1 = This sustainability indicator is low risk, nevertheless, DLT does assess the possible impact of harvest operations on the forests and their surroundings (also considering local residents and entrepreneurs) during field inspections.

2.4.2 = Specified risk on forest fire-fighting.

2.6.1 = The mitigation measures of this indicator are important in reducing the risks related to all social aspects of sustainability.

2.9.1 = Of importance is the negative trend in forest cover (and loss of carbon stocks) over the last 30 years, due to the conversion to agricultural and urban lands.

Table 1. Final risk ratings of Indicators as determined BEFORE 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	Specified	Specified
1.3.1	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Specified	Specified
2.4.3	Low	Low
2.5.1	Low	Low

1.4.1	Low	Low
1.5.1	Low	Low
1.6.1	Low	Low
2.1.1	Specified	Specified
2.1.2	Specified	Specified
2.1.3	Specified	Specified
2.2.1	Specified	Specified
2.2.2	Specified	Specified
2.2.3	Specified	Specified
2.2.4	Specified	Specified
2.2.5	Low	Low
2.2.6	Specified	Specified
2.2.7	Low	Low
2.2.8	Low	Low
2.2.9	Low	Low
2.3.1	Low	Low
2.3.2	Specified	Specified

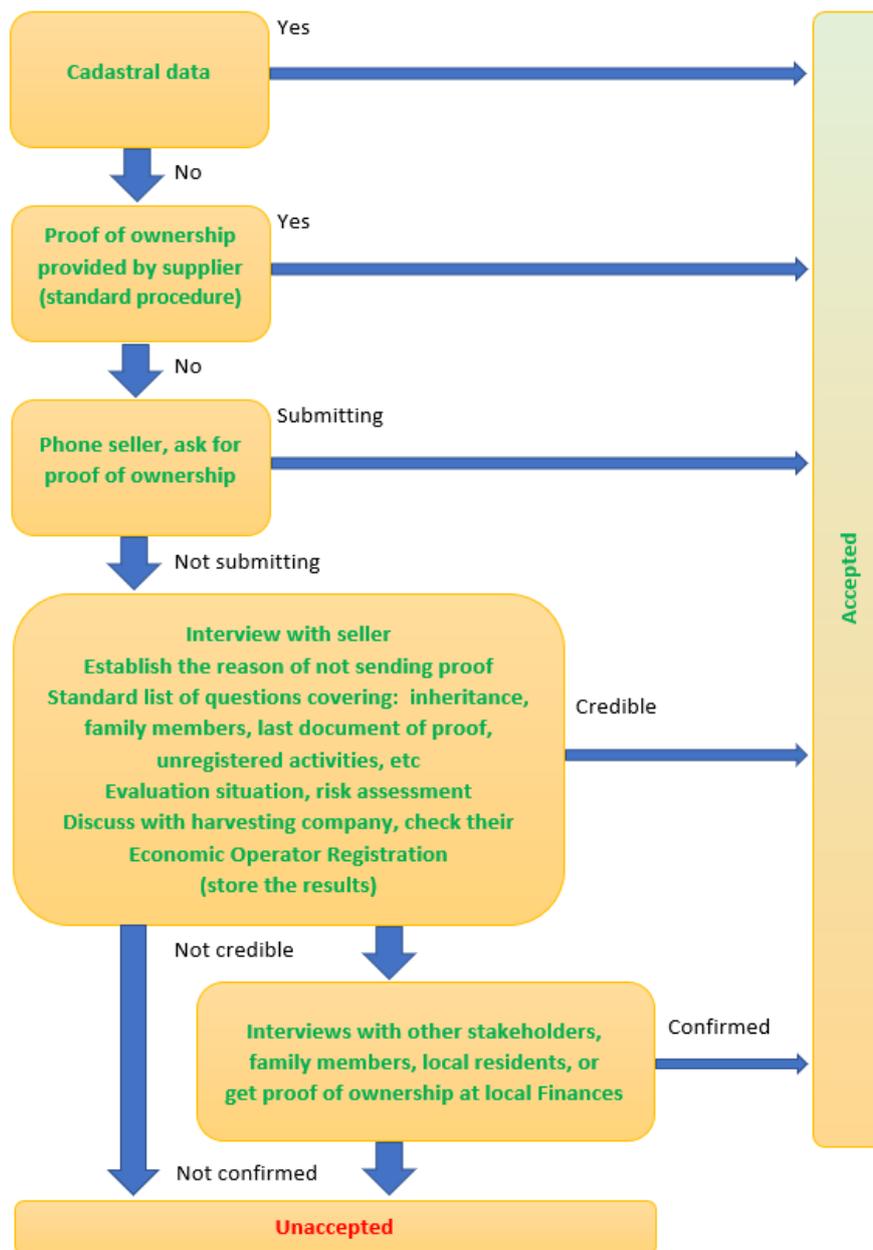
2.5.2	Low	Low
2.6.1	Specified	Specified
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Specified	Specified
2.9.1	Specified	Specified
2.9.2	Low	Low
2.10.1	Low	Low

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

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

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



DLT does not buy wood from wood lands, of which the owner rights are unclear. Any unclarity/dispute concerning the ownership of the wood needs to be solved first.

Considering forestry in the north of Portugal, the fact that there are little disputes / complaints does not guarantee the wood is legal / the seller is indeed the owner of all the plots harvested. For example, areas can become ownerless and abandoned and some could try to take advantage of the situation before the land is impounded by the government.

2.1.1

The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.

HCV 1 & 3

The control system for feedstock, which also includes regular inspections of suppliers, is duly implemented. All used material is traceable to its origin through the harvest manifests and transport guides. All suppliers have to comply with the laws in force, which are supervised by the Tax Authority and the ICNF (Please see the file 'Plano Regional de Ordenamento Florestal')

Mitigation measures

'Documentation point 4 'cartografia síntese' (ICNF) for each region). Some HCV areas are designated as protected and classified areas at the national or EU level (Natura 2000). There are also smaller areas or biotopes important to biodiversity, or classified as priority species' habitats.

DLT identifies and maps areas with high conservation values (HCVs) before the harvest commences. HCV 1 and 3 were assessed to have a specified risk. Extra effort is needed to identify and map these values in practice on paper, regarding the forest plot. Internet sources, as well as the local situation needs to be studied.

Some HCV areas are designated as protected and classified areas at the national or EU level (Natura 2000). There are also smaller areas or biotopes important to biodiversity or classified as priority species' habitats. Habitats and species vulnerable to forestry operations are identified within the scope of Reed Natura2000 and Habitats and Birds Directive reports.

DLT ensures:

- Mapping of the harvesting plot;
- Harvesting according to best practices in sustainable forest management;
- Cleaning of waste from plantations;
- Tree species (no genetically modified trees).

Steps taken:

- Study publicly available sources (internet sites) and other information regarding the plots where harvesting operations are planned and their surroundings;
- Inform feedstock suppliers on found results regarding possible risks in front;
- Onsite assessment of the plots and their surroundings prior to harvesting, measures are taken for example, when habitats are found;
- Development of adaptations to the harvesting plans, if needed.

Below the main sources of information, used to prepare the identification of these values for our harvesting teams. The forestry specialist evaluate every plot before the harvesting operations begins. DLT inspects the suppliers and harvesting areas.

HCV 1 – Species diversity

There is a specified risk that forest operations on private and communitarian grounds and public areas not managed by ICNF could harm species diversity. Species diversity is evaluated and recorded before harvesting operations commence. Caution and best practises are applied. Special attention is given to the National System of Classified Areas (SNAC) and to the Important Bird and Biodiversity Areas (IBAs). See also below, indicator 2.2.4

Some information sources:

- Classified areas: <http://www.icnf.pt/portal/naturaclas/cart>
- Protected area plans: <http://www.icnf.pt/portal/naturaclas/ordgest/poap>

- Endangered species: <http://www.icnf.pt/portal/naturaclas/patrinatur/especies>
- Endemic species: http://naturdata.com/index.php?option=com_content&view=article&id=78&Itemid=60
- Digital mapping information from the [Manual das Linhas Eléctricas](#) [Manual of Electric Lines] (ICNB 2008)
- Important Bird Areas of Portugal at: <http://ibas-terrestres.spea.pt/>
- Regional Forest Plans (PROF): <http://www.icnf.pt/portal/florestas/profs>

HCV 3 – Ecosystems and habitats

There is a specified risk that forest operations on private and communitarian grounds and public areas not managed by ICNF could harm ecosystems and habitats. In these situations, DLT demands to evaluate the environmental impacts (on Ecosystems and habitats) of the forest operations before the forest operations commence. Caution and best practises are applied. See also below, indicator 2.2.3.

Some information sources:

- [Habitats Directive \(2007-2012\)](#)
- Rede Natura 2000 database: <http://www.icnf.pt/portal/naturaclas/rn2000>
- Important Bird Areas of Portugal at: <http://ibas-terrestres.spea.pt/>
- Convention on Biological Diversity (CBD) via DL no. 21/93, dated 29 June.

2.1.2

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

<p>HCV 1 & 3</p> <p>Mitigation measures</p>	<p>There is a specified risk that forest operations on private and communitarian grounds and public areas not managed by ICNF could harm species diversity, ecosystems and habitats. Species diversity is evaluated and recorded before harvesting operations commence. Special attention is given to the National System of Classified Areas (SNAC) and to the Important Bird and Biodiversity Areas (IBAs).</p> <p>DLT identifies and addresses potential threats to forests and other areas with high conservation values (HCVs). The control system for feedstock, which also includes regular inspections of suppliers, is duly implemented. Some HCV areas are designated as protected and classified areas at the national or EU level (Natura 2000). There are also smaller areas and biotopes important to biodiversity, which can be classified as priority species' habitats.</p> <p>Steps taken:</p> <ul style="list-style-type: none"> • Assessment, evaluation and 'SBE approval' of suppliers • Desk Assessment of possible impacts of harvesting operations, regarding Publicly available information from credible third parties; • Training of suppliers on identification of forests with HCVs, and methods to protect HCVs; • Identification and mapping of protected species, habitats and key ecosystems on the plot before harvesting; • Development of adaptations to the harvesting plans, if needed; • Harvesting according to best practices in sustainable forest management; <p>See also below, indicator 2.2.4 and indicator 2.2.3.</p>
<p>2.1.3</p> <p>Mitigation measures</p>	<p>The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.</p> <p>DLT considers all pine stands as forests and eucalypt and poplar stands as plantations. DLT checks if forests have been changed to eucalypt or poplar plantations after 2008. When forest is converted to agricultural land or a plantation, or when land use change (conversion) is planned, the feedstock is not categorized as SBP compliant.</p> <p>When a eucalypt or poplar plantation are cut, the history of the plantation is investigated:</p> <ul style="list-style-type: none"> • The year of conversion to plantation (if it was converted after 2008). If needed, interviews with stakeholders and residents are taken and the plot is searched for tree stumps. • Was it a forest before being converted to plantation? <p>This is dealt with in the Feedstock Supplier Declaration and addressed in the field operations checklist.</p>
<p>2.2.1</p>	<p>The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.</p>

	<p>In case no forest plan is available (no PROF, PGF ZIF, PUB, SNAC, as well as no PEFC or FSC certification), or a plan is available but does not apply to a small holder, an additional assessment of environmental impacts is made and recorded before harvest. Special attention is given to plots smaller than the minimum threshold for the mandatory Forest Management Plan (PROF) and outside the SNAC.</p> <p>Before harvesting operations commence, the plot is visited and evaluated:</p> <ul style="list-style-type: none"> • The possible economical, ecological and social impact of the forest operations, including its surroundings. Harvesting plans can be changed to avoid negative impacts; • Was the forest management conform the law in the past (has the forest been cleaned according to the law in the past); • Specific Plans for Forest Intervention (PEIF) are studied for specific measures for the intervention on forest areas with major biotic problems (e.g.: invasive species, plagues or diseases) or abiotic (e.g.: high risk of forest fire); • Potential impacts of operations on ecosystems and biodiversity are identified. Impacts inside and outside the area of operation are considered, for example downstream; • Impacts are monitored and monitoring results are used to improve operational practices. <p>Indicators 2.2.2, 2.2.3, 2.2.4, 2.2.6, and 2.4.2 include relevant management measures which are checked.</p>
<p>Mitigation measures</p>	<p>2.2.2 The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).</p>
<p>Mitigation measures</p>	<p>Before harvesting operations commence the plot is evaluated. Best forestry practises are applied. Best forestry practices apply:</p> <ul style="list-style-type: none"> • Were needed, considering the soil and groundwater level, only selective cuttings and small clear cuts of maximally 5 ha are planned; • Regeneration focusses on tree species that maintain or improve soil quality; • Leave nutrients in the forests, mainly the green fraction of forest residues less or equal to 3 cm (on the other hand other forest residues need to be cleared to prevent forest fires. • Do not operate near-water areas. • Fertilization of the ground, when needed and possible. <p>On dry locations selective cuttings are often preferable, because the ground gets less direct impact of the sun and the forest can maintain soil quality and regenerate naturally.</p> <p>Poor soil quality can lead to erosion and other problems. Therefore, this indicator is related to indicator 2.2.6.</p>

2.2.3 &
2.2.4

The Biomass Producer 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). & The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).

DLT prepares (publicly available) data on ecosystems and habitats (see above 2.1.1 on mapping and 2.1.2 on identifying and addressing potential threats). This information is given to all feedstock suppliers. Feedstock suppliers are trained to recognise key ecosystems and habitats.

Steps in risk mitigation:

- Training of suppliers, assessing and selecting 'SBE approved' suppliers;
- Desk assessment (before harvesting operations commence) of key ecosystems and habitats:
 - All classified areas:
 - National Network of Protected Areas;
 - Special Areas of Conservation (SAC);
 - Special Protection Areas (SPA);
 - Ramsar sites;
 - Important Bird Areas (IBA);
 - Priority habitats in Natura 2000 network;
 - Areas where threatened species occur;
 - Areas where endemic species of the Iberian Peninsula occur;
 - Areas where seasonal concentrations of species occur;
 - Large landscape level forests;
 - Important areas for watershed protection;
- Forest plot inspection prior harvesting;
- Mapping of the harvesting plot, indicating key ecosystems, habitats and objects of importance to biodiversity; making photos prior to harvesting.
- Best forestry practices, including measures to conserve and increase biodiversity (for example, standing dead wood).
- Change of operational plan, if necessary.

**Mitigation
measures**

2.2.6

The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).

DLT monitors the harvesting operations of its feedstock suppliers. Best practices are required to comply with the SBE program requirements.

<p>Mitigation measures</p>	<ul style="list-style-type: none"> • Desk assessment (before harvesting operations commence) of Important areas for watershed protection <ul style="list-style-type: none"> ○ Cork oak and holm oak savannas located in areas with an aquifer recharge rate of over 175 mm/year ○ Aquifers • The plots and the surroundings (hill slopes and streams) are inspected on: <ul style="list-style-type: none"> ○ Runoff problems (regarding the landscape, onsite and in the surroundings); ○ Groundwater level problems (too high or too low); ○ Protection of riversides and (lake) coastlines; • In areas vulnerable to water damage, the maximal contiguous clear cut area is 5 ha; • Best forestry practices; Feedstock suppliers are trained to not contaminate ground water and to plan forest management operations that protect the soil, forest and surroundings from surface water runoff; Runoff of elements of fertilizers and pesticides into the surrounding environment.
<p>2.3.2</p> <p>Mitigation measures</p>	<p>Adequate training is provided for all personnel, including employees and contractors (CPET S6d).</p> <p>DLT trains its personnel on all relevant aspects and demands the same from its feedstock suppliers.</p> <ul style="list-style-type: none"> • Training records obligatory according to legislation and records of qualification are collected during supplier qualification process and checked during supplier inspections; • Training conducted by DLT in several fields, including identification of key ecosystems, habitats and species biodiversity (annually and additionally based on the results of the plot assessments); • Training on best forest management practices. • DLT performs supplier inspections: the training records, (new) workforce, and the hiring of specialists. The level of knowledge of personnel is inspected during site visits.
<p>2.4.2</p> <p>Fire fighting</p> <p>Mitigation measures</p>	<p>The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).</p> <p>On the above information specified risk is assessed on the fire management at forest level.</p> <p>Visual inspection of the plot before harvesting (checklists). Checked is if the plot was managed well on fire protection in the past.</p> <ul style="list-style-type: none"> • Investigation of PMDFCI (Municipal Forest Fire Protection, Municipal de Defesa da Floresta Contra Incêndios); • Visual inspection of the plot before harvesting; • Implementation of forest fire fighting measures according to law;

	<ul style="list-style-type: none"> • Best forest practices; • Monitoring performance.
<p>2.6.1</p> <p>Mitigation measures</p>	<p>Appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.</p> <p>Such mechanisms play an important function as a safety net for sufficient performance on social and cultural aspects of Sustainable Forest Management and in complying with other indicators of SBP standard 1.</p> <ul style="list-style-type: none"> • The aim is to solve grievances and disputes before the harvesting operations commence (or not to buy from the disputed plots). • DLT makes clear to employees and stakeholders that any complaint or comment related to feedstock supply is taken very seriously, to ensure sufficient performance on legality and social aspects of Sustainable Forest Management. • DLT has a complaint procedure and keeps records. The feedstock suppliers are also required (signed supplier declaration) to actively implement a complaint procedure and keep records. • DLT monitors the harvesting operations of its feedstock suppliers and checks their records on Complaints and Comments. Proactive interviews with relevant stakeholders, such as land owners on submitted comments (orally and in writing), and assesses if complaints were dealt with sufficiently. • The results of the inspections have direct influence on the 'SBE program approved' status of feedstock suppliers.
<p>2.8.1</p> <p>Mitigation measures</p>	<p>The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).</p> <p>DLT has a control system and adequate procedures on the health and safety of forest workers. DLT demands the same from its feedstock suppliers and checks the health safety of harvesting personnel during its monitoring (administrative and field) inspections.</p> <ul style="list-style-type: none"> • Supplier qualification process and inspections of the supplier's administration: <ul style="list-style-type: none"> ○ Insurances and aptitude forms; ○ Social Security; ○ Present workforce and training (new) personnel; ○ Health and safety procedures; ○ Training records and hiring of specialists; ○ Records of Personal Protection Equipment (PPE) distribution; ○ Records of machinery safety tools and equipment on documental register; ○ Medical record for employment.

- Field inspection supplier:
 - Protective equipment use;
 - Medical kit;
 - Fire extinguisher;
 - Respect of safety distances;
- Level of knowledge of personnel.

2.9.1

Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.

Wood from forests converted to plantations, as also wood lands that are converted to non-forest use are not considered SBP compliant.

Wood from forests which are not managed according to best practices and which do not safeguard the carbon stocks above (regeneration of forests) and in the ground (degradation of grounds) are not considered SBP compliant. See also indicator 2.2.2. Non-compliance with this indicator can also result in not procuring the feedstock.

Mitigation measures

- Desk assessment, monitoring, and identification – high-risk and ‘Important areas for carbon storage’;
- Field inspections and possible adaptations of forest management plans;
- Limitation of harvesting operations on ‘Important areas for carbon storage’.

See also indicator 2.1.3.

10 Non-conformities and observations

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

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

NC number 01	NC Grading: Minor
Standard & Requirement:	Std 2, 15.6. BP shall implement a management review system, which has the authority to make appropriate improvements to the management system.
Description of Non-conformance and Related Evidence:	
Despite the existence of a template for a management review, this review is not described in the Manual FSC e SBP, or in any other system document.	
Timeline for Conformance:	By the next surveillance audit, but no later than 12 months from report finalisation date
Evidence Provided by Company to close NC:	<i>Click or tap here to enter description provided by Company to close the NC.</i>
Findings for Evaluation of Evidence:	<i>Click or tap here to enter findings for evaluation of evidence by the auditor.</i>
NC Status:	Open

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):	Hubert Jurczyszyn
Date of decision:	12/Jan/2021
Other comments:	