

DNV GL Business Assurance Finland Oy Ab Evaluation of RL Skovservice /v Rene Løvborg Compliance with the SBP Framework: Public Summary Report

Fourth Surveillance Audit

www.sbp-cert.org



Completed in accordance with the CB Public Summary Report Template Version 1.5

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

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

Primary CB contact for SBP: Jyrki Sopanen

Primary CB contact email: jyrki.sopanen@dnvgl.com

Audit team leader: Karina Seeberg Kitnaes

Audit team members: Karina Seeberg Kitnaes

Name of the Company: RL Skovservice /v Rene Løvborg

Company legal address: Sepstrupvej 26, 8653 Them, Denmark

Company contact for SBP: Rene Løvborg

Company contact email: rene@rlskovservice.dk

Company website: N/A

SBP Certificate Code: SBP-05-12

Date of certificate issue: 07 Jun 2017

Date of certificate expiry: 06 Jun 2022

Audit closing meeting date: 19 May 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	
Includes Supply Base Evaluation (SBE):	Yes	
Includes communication of Dynamic Batch Sustainability Data (DBSD)	No	
Includes Group Scheme	No	
Products	Chips	

Feedstock types:	Primary, Secondary	
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	PEFC: NC-PEFC/COC-025953	
implemented:	Transfer	

2.1 Description of the company

RL Skovservice v/ René Løvborg is a company owned and managed by René Løvborg. The company offers forest contractors services to Danish forest and land owners, predominantly in the central part of Jutland. The feedstock is primary feedstock originating from Danish forests and surrounding landscape, which are chipped in the forest as part of the harvest operation and then either placed at roadside (temporary storages) or occasionally transported to the company' storage facility. The feedstock is purchased either as standing volume, as fuel wood in stacks in the forest of origin or as fuel wood or chips from other suppliers sourcing within the Supply Base. In all cases the origin is known, and if buying wood chips from other suppliers, the BP will apply own feedstock classification and always conduct own risk mitigation measures to secure low risk. The BP source either non-certified or PEFC certified wood. The BP implements appropriate mitigating measures in relation to the four specified risk indicators identified in the SBP endorsed RRA for Denmark. The BP is supplying the woodchips produced directly from the forest via truck to the customers, which are heat and power plants and district heating plants. The BP has a storage yard at its office address. RL Skovservice v/ René Løvborg is a certified group member of the PEFC COC group certificate held by DM&E. This PEFC group certificate has the PEFC COC certificate code NC-PEFC/COC-025953. The feedstock to the BP is sourced from the supply Base: Denmark. The feedstock is supplied through the harvest and chipping operations screened, performed and/or monitored by the BP. The BP's supply base is both state owned and privately owned forests.

2.2 Detailed description of the Chain of Custody system

All feedstock sourced is covered by the BP's own wood traceability system, which is third party certified according to PEFC Chain of Custody. The BP is a group member in a PEFC certified group scheme maintained with a group manager. This PEFC group certificate has the PEFC COC certificate code NC-PEFC/COC-025953. All feedstock is sourced through the PEFC COC systems of the company, which covers wood chips as a product group. 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 PEFC certified. This system is applied for SBP as well, since the same processes are transport, storage, chipping and loading from forests to end-points. The BP purchases non-certified Roundwood and through the SBE using the approved RRA for Denmark and SVP with field verification and control measures sells biomass as SBP-compliant biomass to customers holding valid SBP certificate. The main part of the feedstock is purchased as non-FSC/PEFC-certified but through the BPs SBE categorized as low risk with the possibility to sell the biomass as SBP-compliant biomass. 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 BP 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	2,0	
2. On-site (excl. travel time)	Karina Seeberg Kitnaes	11,2	
3. Report writing	Karina Seeberg Kitnaes	4,0	
4. Other	Jyrki Sopanen	2,0	

Audit Schedule			
Activity	Location	Auditor name	Date/time
Audit planning, document review	Home office	Karina Seeberg Kitnaes	03 May 2021/09:00
Opening meeting	On-site at BP office	Karina Seeberg Kitnaes	18 May 2021/10:00
SBP Std. 4: Chain of Custody	On-site at BP office	Karina Seeberg Kitnaes	18 May 2021/10:30
SBP Std. 5: Collection and communication of data,	On-site at BP office	Karina Seeberg Kitnaes	18 May 2021/12:30

instruction doc 5E			
Inspection of storage facilities	On-site at storage	Karina Seeberg Kitnaes	18 May 2021/16:00
SBP Std. 1: Feedstock compliance	On-site at BP office, field	Karina Seeberg Kitnaes	19 May 2021/09:00
SBP Std. 2: Verification of feedstock	On-site at BP office, field	Karina Seeberg Kitnaes	19 May 2021/10:00
Field visits related to Std. 1 and 2	Field onsite forest operations	Karina Seeberg Kitnaes	19 May 2021/13:00
Closing meeting	On-site at BP office	Karina Seeberg Kitnaes	19 May 2021/16:30
Review and reporting	Home office	Karina Seeberg Kitnaes	02 Jun 2021/09:00
Technical Review	Home office	Jyrki Sopanen	30 Jun 2021/09:00

Auditor qualification				
Auditor name	Role	Qualification		
Karina Seeberg Kitnaes	SBP Lead Auditor	Biologist, M.Sc., approved SBP lead auditor since 2016, FSC and PEFC FM/COC/CW auditor since 2001, 25 years of professional international experience with forest biodiversity, forestry, forest industry, certification, Natura 2000 implementation, key biotope mapping from working as expert on targeted projects in Northern, North-eastern and Eastern Europe and many other countries.		

Jyrki Sopanen	Technical	M.Sc. Forestry, Lead Auditor, Certifiation,
	Review	Operations Delivery Finland, Business Assurance

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 Periodic Surveillance Audit 3 contained:

- -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.
- -Site inspection of harvesting sites/mobile chipping sites, forests of origin, and of in-forest storage of wood chips 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 Periodic Surveillance Audit 4 resulted in closure of two open observations from the previous audit. No new non-compliances were identified.

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 - SBR 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: 8 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 is proven long-term experience of trading and forest planning of the manager.

During the review and evaluation of the BP' SBE with using the SBP-endorsed RRA for Denmark and the SVP, the strengths of the BP include the clear track of feedstock to origin and its flows from the forest to the energy sector, the full overview of suppliers, the use of the SBP approved RRA for Denmark with identification of four indicators with specified risk. The BP has well-developed and clear SVP risk mitigation measures to get these four specified risk indicators categorised to low risk, including the screening and monitoring of suppliers and their forests and the system setup, procedures, field verification, control and monitoring of forest operations. The machine operators showed good awareness of best practice in forest machine operation, and all operators have attended a three-day training course in machine operation in near-natural forests, which is a requirement for forest contractors that operate in the FSC and PEFC certified Danish State forests.

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

The audits did not identify any significant weaknesses.

5.2 Rigour of Supply Base Evaluation

The BP has used the SBP endorsed regional risk assessment which has been widely circulated for stakeholder consultation. Based on the "specified risks" in this risk assessment the organization has implemented relevant mitigation measures.

The BP has used the SBP endorsed RRA for Denmark and by using this conducted a rigorous Supply Base Evaluation of the defined Supply Base. For the SBP endorsed risk assessment (RRA), the risk was designated low for all indicators of the SBP Standard 1 apart from four: 2.1.1, 2.1.2, 2.2.3 and 2.2.4.

The BP 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 BP has developed clear risk mitigation measures, including supplier screening (all similar suppliers being forest owners or land owners) in their SVP, and screening procedures for the forest site before harvest operations, routines for field verification, recording and control and monitoring mechanisms of the forest operations conducted.

The evaluation found that the mitigation measures are sufficient to bring the four specified risk indicators down to low risk.

5.3 Collection and communication of data

Since the scope of the SBP system is limited to purchase of feedstock, chipping, storage 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 and by 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) v2.1.

5.4 Competency of involved personnel

The BP has a relatively simple operation, with all administrative tasks being carried out by the owneroperator

René Løvborg and the bookkeeper Jette Fogtmann. Both administrative staff showed good awareness of their management system, and of the objectives and restrictions in the SBP system.

The owner and the machine operators showed good awareness of best practice in forest machine operation,

and all operators have attended a three-day training course in machine operation in near-natural forests, which is a requirement for forest contractors that operate in the FSC and PEFC certified Danish State forests.

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

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

The BP has documented qualification requirements for personnel involved in the different aspects of the SBP

system, including the qualifications needed for SBE.

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

6 Review of company's risk assessments

6.1 Overview of company's risk assessments and mitigation measures

The BP has used the SBP endorsed RRA for Denmark with low risk in all indicators apart from four indicators with specified risk (2.1.1, 2.1.2, 2.2.3 and 2.2.4).

The lead auditor reviewed the RRA and the related documentation maintained by the BP and audited the BP up against the SBP Std. 1 to confirm any sensitive or missing elements to the BP's approach for using the RRA and to review if the BP has sufficient knowledge and documentation in place as verification and/or had implemented sufficient mitigation measures leading to confirming low risk in the four specified risk indicators.

The four indicators with specified risk in the SBP endorsed RRA for Denmark are:

- 2.1.1The BP has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation value in the Supply Base are identified and mapped.
- 2.1.2The BP 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.
- 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).
- 2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).

The reason for the specified risk for these four indicators are related to protection of key biotopes as defined in Danish context and HCVs.

For this purpose, the BP has appropriate and clear systems and procedures as risk mitigation measures to ensure that these four indicators can be categorised as low risk. 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 (key biotopes and HCVs) during forest operations. These four indicators can thus be tackled by the same set of SVP and risk mitigation measures.

The BP has setup the SVP and risk mitigation measures including listing and screening suppliers (forest owners), defining one set of suppliers (forest owners and external forest managers), and developing tools and screening procedures for checking and verifying that no nature values are damaged as part of the forest operations performed, and monitoring procedures for field verification.

The BP uses the SBP endorsed RRA for Denmark, June 2017. The specified risks of indicators 2.1.1, 2.1.2, 2.2.3, 2.2.4 are further defined as only being so for two types:

2) primary feedstock from forest (with a green management plan) without mapping of key biotopes (2.1.2, 2.2.3, 2.2.4), and

5) primary feedstock from uneven--aged stands or stands of broadleaf species (without green management plan/certification) (2.1.1, 2.1.2, 2.2.3, 2.2.4),

while there is low risk for primary feedstock from: FSC or PEFC certified forests, forests with a green management plan including mapping of key biotopes, thinnings of even-aged conifer stands, thinnings of first generation reforestation forest, and non-forest areas, e.g. nature maintenance projects, windbreaks or residential areas.

To minimise the specified risk and bring this to 'Low Risk', the BP is working according to its own risk mitigation measures described in the company procedures manual.

General:

- -The BP handles the entire process for most of the feedstock purchased and wood chips sold. This means customer contact, job planning with screening of forest site, job execution with field inspection of forest site as well as transport and sale of wood chips. Each job order/project is planned and controlled by the BP's project managers or in few cases by external forest managers.
- -Each project is given a unique case number and address, which is marked in the system, on the work instruction, weighing forms etc.

Screening:

-For all suppliers (forest owners), the BP agrees with the forest owner about the harvest operation and obtains information regarding whether or not the forest site is covered by a

General:

- -The BP handles the entire process for most of the feedstock purchased and wood chips sold. This means customer contact, job planning with screening of forest site, job execution with field inspection of forest site as well as transport and sale of wood chips. Each job order/project is planned and controlled by the BP's project managers or in few cases by external forest managers.
- -Each project is given a unique case number and address, which is marked in the system, on the work instruction, weighing forms etc.

Screening:

- -For all suppliers (forest owners), the BP agrees with the forest owner about the harvest operation and obtains information regarding whether or not the forest site is covered by a green management plan, mapping of key biotopes or a forest certification. If the property is certified or has a green management plan, the map with recorded key biotopes must be provided to the BP.
- -The forest area is screened through checking all known data (DM&E's map portal with all available maps and records) from the official databases/portals.

Field control:

- -The BP physically assess the harvest operation site after the screening and before felling. This means that it is highly certain that the areas are screened correctly.
- -The forest site is classified as one of the defined six types in the RRA by the project manager, which is familiar with identifying key biotopes according to the Danish methodology.
- During and after the harvest operation, the BP checks on-site again.

Map and work instructions:

-A map and checklist of the harvesting site is prepared to ensure that the machine operator is aware of any protected or valuable key biotopes/culture elements/HCVs. The map shows identified areas with key biotopes/HCVs.

Biomass is only sold as SBP-compliant biomass if it originates from suppliers for which Low Risk can be established for the four specified risk indicators through the measures above.

Occasionally, a minor part of the wood chips may be purchased from an external forest manager. The procedure for the purchase of external wood chips is that the BP handles this exactly as if it was its own project. The external forest manager being trained by the BP performs and records the performed screening and field check and provide the documentation to the BP.

The BP has monitored the suppliers of roundwood and wood chips respectively, 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 the project manager and the suppliers (forest owner), checking training implemented and checking the recorded information and examples of maps with known key biotopes/HCVs, project work instructions, project id 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 procedures for verifying that forests and other areas with high	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 biodiversity in a broader sense, the following source types are defined and their risk levels assessed: 1. Feedstock originating from FSC or PEFC	To minimise the specified risk and bring this to 'Low Risk', the BP is working according to its own risk mitigation measures described in the company procedures manual. General: -The BP handles the entire process for most of the feedstock purchased and wood chips sold.

conservation value in the Supply Base are identified and mapped.

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. Risk conclusion: Based on the evidence provided in the RRA, under indicator 2.1.1, it is concluded that there is a specific risk that at least locally important Key Biotopes in forests have not yet been identified and mapped, and may therefore be at risk from threats due to sourcing of biomass. However, it is also concluded that some source types are inherently low in key biotopes, such as first generation afforestation areas or even-aged stands of conifers.

This means customer contact, job planning with screening of forest site, job execution with field inspection of forest site as well as transport and sale of wood chips. Each job order/project is planned and controlled by the BP's project managers or in few cases by external forest managers.

-Each project is given a unique case number and address, which is marked in the system, on the work instruction, weighing forms etc.

Screening:

-For all suppliers (forest owners), the BP agrees with the forest owner about the harvest operation and obtains information regarding whether or not the forest site is covered by a

General:

- -The BP handles the entire process for most of the feedstock purchased and wood chips sold. This means customer contact, job planning with screening of forest site, job execution with field inspection of forest site as well as transport and sale of wood chips. Each job order/project is planned and controlled by the BP's project managers or in few cases by external forest managers.
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-For all suppliers (forest owners), the BP agrees with the forest owner about the harvest operation and obtains information regarding

			whether or not the forest site is covered by a green management plan, mapping of key biotopes or a forest certification. If the property is certified or has a green management plan, the map with recorded key biotopes must be provided to the BP. -The forest area is screened through checking all known data (DM&E's map portal with all available maps and records) from the official databases/portals.
			Field control: -The BP physically assess the harvest operation site after the screening and before felling. This means that it is highly certain that the areas are screened correctly. -The forest site is classified as one of the defined six types in the RRA by the project manager, which is familiar with identifying key biotopes according to the Danish methodology. - During and after the harvest operation, the BP checks on-site again.
			Map and work instructions: -A map and checklist of the harvesting site is prepared to ensure that the machine operator is aware of any protected or valuable key biotopes/culture elements/HCVs. The map shows identified areas with key biotopes/HCVs.
Denmark	2.1.2 The BP has implemented appropriate control systems and procedures to	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 biodiversity in a broader sense,	To minimise the specified risk and bring this to 'Low Risk', the BP is working according to its own risk mitigation measures described in the company procedures manual. General:

identify and address potential threats to forests and other areas with high conservation values from forest management activities.

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: It is a requirement for receiving subsidies for developing a Green Management plan that HCV areas in the forest are identified and mapped. However, there is no strict requirement that the HCVs are monitored and protected from forest management. SPECIFIED RISK. 3. Feedstock from thinning in even-paged stands of conifers: LOW RISK. 4. Feedstock from thinning in first generation afforestation areas: LOW RISK. 5. Feedstock from uneven-paged 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. Risk conclusion in RRA, under indicator 2.1.2: Please see indicator 2.1.1 for discussion regardiing the risk designation for identification and mapping of HCVs.

- -The BP handles the entire process for most of the feedstock purchased and wood chips sold. This means customer contact, job planning with screening of forest site, job execution with field inspection of forest site as well as transport and sale of wood chips. Each job order/project is planned and controlled by the BP's project managers or in few cases by external forest managers.
- -Each project is given a unique case number and address, which is marked in the system, on the work instruction, weighing forms etc.

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Denmark	2.2.3 The BP has implemented appropriate	Based on the existing protection through the Forest Act and designation of Natura 2000 areas and individual protected areas, it	To minimise the specified risk and bring this to 'Low Risk', the BP is working according to its own risk mitigation measures described in

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

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 (nøglebiotoper), which are not systematically identified and mapped. Based on a precautionary approach the risk assessment concludes that for these areas the risk is specified based on the same findings as for indicators 2.1.1 and 2.1.2.

the company procedures manual.

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- -The forest area is screened through checking all known data (DM&E's map portal with all available maps and records) from the official databases/portals.

Field control:

- -The BP physically assess the harvest operation site after the screening and before felling. This means that it is highly certain that the areas are screened correctly.
- -The forest site is classified as one of the defined six types in the RRA by the project manager, which is familiar with identifying key biotopes according to the Danish methodology.
- During and after the harvest operation, the BP checks on-site again.

Map and work instructions:

-A map and checklist of the harvesting site is prepared to ensure that the machine operator is aware of any protected or valuable key biotopes/culture elements/HCVs. The map shows identified areas with key biotopes/HCVs.

Denmark 2.2.4 The BP has implemented appropriate control systems and procedures to ensure that

biodiversity is

(CPET S5b).

protected

The RRA under this indicator concludes: 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. Required risk mitigation measures are the same as outlined for indicators 2.1.1 and 2.1.2.

To minimise the specified risk and bring this to 'Low Risk', the BP is working according to its own risk mitigation measures described in the company procedures manual.

General:

- -The BP handles the entire process for most of the feedstock purchased and wood chips sold. This means customer contact, job planning with screening of forest site, job execution with field inspection of forest site as well as transport and sale of wood chips. Each job order/project is planned and controlled by the BP's project managers or in few cases by external forest managers.
- -Each project is given a unique case number and address, which is marked in the system, on the work instruction, weighing forms etc.

Screening:

-For all suppliers (forest owners), the BP agrees with the forest owner about the harvest operation and obtains information regarding whether or not the forest site is covered by a

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Screening:

- -For all suppliers (forest owners), the BP agrees with the forest owner about the harvest operation and obtains information regarding whether or not the forest site is covered by a green management plan, mapping of key biotopes or a forest certification. If the property is certified or has a green management plan, the map with recorded key biotopes must be provided to the BP.
- -The forest area is screened through checking all known data (DM&E's map portal with all available maps and records) from the official databases/portals.

Field control:

- -The BP physically assess the harvest operation site after the screening and before felling. This means that it is highly certain that the areas are screened correctly.
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	elements/HCVs. The map shows identified areas with key
	biotopes/HCVs.

7 Non-conformities and observations

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:	N/A
Certification decision by (name of the person):	N/A
Date of decision:	N/A
Other comments:	N/A