



NEPCon OÜ Evaluation of claus rodenberg waldkontor gmbh Compliance with the SBP Framework: Public Summary Report

Scope Change Audit

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Table of Contents

- 1 Overview**
- 2 Scope of the evaluation and SBP certificate**
 - 2.1 Description of the company
 - 2.2 Detailed description of the Chain of Custody system
- 3 Specific objective**
- 4 Evaluation process**
 - 4.1 Timing of evaluation activities
 - 4.2 Description of evaluation activities
 - 4.3 Sampling methodology
 - 4.4 CB stakeholder engagement
 - 4.5 Stakeholder feedback
- 5 Results**
 - 5.1 Main strengths and weaknesses
 - 5.2 Rigour of Supply Base Evaluation
 - 5.3 Collection and communication of data
 - 5.4 Competency of involved personnel
- 6 Review of company's risk assessments**
 - 6.1 Overview of company's risk assessments and mitigation measures
 - 6.2 Specified risk indicators and mitigation measures
- 7 Non-conformities and observations**
- 8 Certification decision**

1 Overview

Certification Body (CB) Name:	NEPCon OÜ
Primary CB contact for SBP:	Ondrej Tarabus
Primary CB contact email:	otarabus@preferredbynature.org
Audit team leader:	Ondrej Tarabus
Audit team members:	Ondrej Tarabus
Name of the Company:	claus rodenberg waldkontor gmbh
Company legal address:	Schmiedekoppel 7-9, 23847 Kastorf, Germany
Company contact for SBP:	Holger Schwarz
Company contact email:	holger.schwarz@waldkontor.com
Company website:	N/A
SBP Certificate Code:	SBP-07-51
Date of certificate issue:	07 Feb 2020
Date of certificate expiry:	06 Feb 2025
Audit closing meeting date:	04 Mar 2021
Audit cycle:	Scope Change 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	<input type="checkbox"/>
Approved Standards:	SBP Standard 1: Feedstock Compliance Standard; SBP Standard 2: Verification of SBP-compliant Feedstock; SBP Standard 4: Chain of Custody; SBP Standard 5: Collection and Communication of Data Instruction; Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.3	<input type="checkbox"/>
Includes Supply Base Evaluation (SBE):	Yes	<input type="checkbox"/>
Includes communication of Dynamic Batch Sustainability Data (DBSD)	Yes	<input type="checkbox"/>
Includes Group Scheme	No	<input type="checkbox"/>
Products	Chips	<input type="checkbox"/>

Feedstock types:	Primary, Secondary	<input type="checkbox"/>
Feedstock origin (countries):	Germany, Poland, Sweden	<input type="checkbox"/>
SBP-endorsed Regional Risk Assessments used:	Not applicable	<input type="checkbox"/>
Public link: https://sbp-cert.org/documents/standards-documents/risk-assessments/		<input type="checkbox"/>
Chain of custody system implemented:	FSC: GFA-CoC-500093	<input type="checkbox"/>
	Transfer	<input type="checkbox"/>

2.1 Description of the company

Claus rodenberg waldkontor gmbh is located in northern Germany, close to the city of Lübeck. The main business activity is timber harvesting in the north and east of Germany. To support those activities and the commerce, waldkontor operates a fleet of sea ships and trucks. The production of biomass for energy production is another business activity, that goes hand in hand with the timber harvest. In Germany the organization has stationary chipping in two ports (Lubeck, Greifswald). The material is delivered in form of roundwood. Only low quality roundwood, disseized wood or thinning wood of different species is used when it comes to wood originating from forest. The BP is also sourcing wood harvested from landscape or roadside. In any case, the feedstock is transported by their own or rented trucks to the port where are stored and chipped. Additionally, the BP is sourcing wood chips from sawmills which are also delivered to the port where are kept separated. This wood chips are delivered from German sawmills which source material from Germany only. Lately, the organization has started to produce chips also from mobile chippers in such case three ports are used (Papenburg, Nordenham and Stralsund). In Poland, the chips are produced directly in the forest (only forest-based feedstock is used) and transported to ports Stettin and Gdyna where are stored. Once there are enough chips in the port the material is loaded to the vessel and transported to the client. In Sweden, the chips are also produced directly in the forest (only forest-based feedstock is used) and transported to ports Iggesund or Klintehamn where are stored. Once there are enough chips in the port the material is loaded to the vessel and transported to the client. Most of the material is shipped via own vessels from the port of Lübeck (potentially also port Greifswald), where own machinery and equipment is operated by waldkontor personal or from the port of Gdynia (potentially also Stettin) in Poland where the BP receives material already chipped.

2.2 Detailed description of the Chain of Custody system

The BP is using transfer system to manage the certified claims. The BP holds both FSC (GFA-CoC-001112) and PEFC (GFA-CoC-500093) certificates. The organization implements both PEFC and FSC CoC systems

based on physical segregation and the FSC physical segregation will be used for controlling of the SBP claims. Germany - the material is received in form of roundwood and chipped at the port. During the reception of the material, the delivery notes are checked and recoded (together with other details such as transportation distance, volume, certified claim et.) in the internal system and it is decided where the material will be stored. The material is delivered either by BP own or external contractors' trucks. Material either with certified claim or included in the BP SBE is accepted only. Poland and Sweden - the material is received only with FSC or PEFC claim, this is checked at the entrance and evidence send electronically to the responsible person for verification. Once the material is checked and sufficient volume is accumulated sales is taking place. No partial claim or material with certified claim is accepted, all material is certified.

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 the evaluation covered:

- Review of the BP's management procedures;
- Review of the production processes;
- Review of FSC system control points, analysis of the existing FSC CoC system;
- Interviews with responsible staff;
- Review of the records, calculations and conversion coefficients;
- Review of Supply Base Evaluation; risk assessment, risk designation,
- GHG data collection analysis and assessment of compliance with ID 5E

4 Evaluation process

4.1 Timing of evaluation activities

<i>Audit Level of Effort (LoE)</i>		
Activity	Auditors	Auditor hours
1. Preparation	OT	3,0
2. On-site (excl. travel time)	OT	6,0
3. Report writing	OT	5,0
4. Other	N/A	N/A

Audit Schedule			
Activity	Location	Auditor name	Date/time
<i>Opening meeting</i>	Desk based	OT	02 Mar 2021/09:00
<i>Material origin, DCS, delivery notes and invoices</i>	Desk based	OT	02 Mar 2021/09:30
<i>Chain of custody review (virtual site tour)</i>	Desk based	OT	02 Mar 2021/09:30
<i>Sales of SBP material, DTS</i>	Desk based	OT	04 Mar 2021/09:00

SAR	Desk based	OT	04 Mar 2021/11:00
<i>Closing meeting</i>	Desk based	OT	04 Mar 2021/13:00

Auditor qualification		
Auditor name	Role	Qualification
ondrej tarabus	Auditor	Czech citizen, graduated in University of Life Sciences Prague, The Faculty of Forestry. He has participated in several FSC FM, FSC CoC, PEFC CoC, ISCC certification assessments in Czech Republic, Slovakia, Italy, Germany, Vietnam, Egypt, Spain, Romania, Bosnia and Herzegovina, Austria, etc. Ondřej Tarabus has been through lead assessor SBP training course and is experienced with carbon calculation using standards such as ISO 14 064, Carbon Footprint management or ISCC.

4.2 Description of evaluation activities

The audit started with the opening meeting and continued with the interview with responsible person. The main objective was to verify the new country included (Sweden) included in the scope and the relevant requirements of all material from those origins. The focus was on evolution of the supplier and material received in the port. The verification of the energy data such as distance and evaluation of delivery documentation. The audit continued with the interview with the supplier and finished with SAR review together with the SBP responsible person of the organization. Due to a COVID-19 travel restriction, the whole audit was done remotely.

4.3 Sampling methodology

Sampling was applied when checking the delivery documents from the supplier. Random selection was applied.

4.4 CB stakeholder engagement

Between the two audits some NGOs were contacted and discussion took place over phone with the aim to identify the main aspects where the risk should be designated as specified.

4.5 Stakeholder feedback

Based on the consultation with stakeholder it was concluded that they generally there is an agreement with the risk assessment conclusion, but they have raised following topics which they think we should focus on specifically:

1. Increasing use of chemicals on a large scale level (due to outbreaks fly over damaged stands)
2. High amount of game in the forest which leads to poor natural regeneration rate. The legislation is old and being reviewed and also not implemented properly
3. Protection of NATURA 2000 sites – here the NGOs refer to FSC CNRA (pg.3) where the low risk is justified
4. Replantation of damaged stands (bark beetle or storm) by exotic species
5. The main risk is seen with big private owners

These comments were taken into account prior and during the audit and it was evaluated how the risk assessment address these. It was concluded that most of the issues are actually addressed or the organization has explained why these would not lead to specified risk.

5 Results

5.1 Main strengths and weaknesses

Strengths: Effective recordkeeping system. Own harvesting operation as well as transport. Small number of the management staff and clearly designated responsibilities within the staff members.

Weaknesses: The organization is quite new in biomass production and some aspects such as storing of material is not fully set up and need further improvement.

5.2 Rigour of Supply Base Evaluation

The Supply Base Evaluation was implemented only for primary feedstock sourced from Germany. The supply base is the forests, roadside wood, riverside wood, nature areas and urban plantations, all over Germany. Two feedstock types have been identified by BP: harvesting of forest biomass (low quality roundwood, diseased wood and thinnings) and non-forest biomass such as roadside, riverside or other wood from landscape. Since the legislation requirements are the same for the whole supply base, SBE is completed without splitting the supply base to sub-scopes.

Claus rodenberg has developed the risk assessment by themselves using their own personnel using help from intern who did the research work and capitalizing the work done in CNRA for Germany.

The CNRA for Germany was used as the backbone of BP's SBE. The CNRA has been approved by FSC International in April 2018 and the actual work was carried out by several expert-contractors. The CNRA process is a lengthy one that takes more than a year to complete. The process includes stakeholder consultation, and the risk assessment is done in a team effort where international consultant work with a larger group of local experts. It includes a public consultation round as well. All information about the procedures and results can be found here: <https://fsc.org/en/document-centre/documents/resource/201>

The CNRA resulted to a low risk identification for all 5 main categories and all 32 underlying indicators. BP also concluded the low risk for all SBP indicators during the Risk Assessment within SBE process.

5.3 Collection and communication of data

The following energy sources are used by BP: electricity in the storage areas; transport distance of the feedstock, distance of the biomass transportation to customer. Electricity and diesel consumption value by loaders is based on actual refuelling data obtained in accountancy.

The data are recorded per each delivery, there is a good recordkeeping system.

5.4 Competency of involved personnel

Overall, BP staff showed good understanding of knowledge of all applicable SBP requirements. The key staff members are involved to SBP certification: SBP responsible (development and updating of SBP Procedure and related documentation; development of the risk assessment, stakeholder consultation, review of complaints related to SBP certification), FSC responsible (Supply Base Report updating), logistic and SBP responsible (updating of SAR, preparation of SREG if applicable), foreman (registration of the production volumes), and few more staff members. No external consultant involved, the SBP responsible person has experience with implementation of the SBP standards from his previous employment.

6 Review of company's risk assessments

6.1 Overview of company's risk assessments and mitigation measures

The BP has developed the risk assessment with evaluation of each individual indicator. The risk assessment outlined low risk for all indicators.

Based on the information gathered during this audit, it was concluded by the auditor that the risk designations for each indicator was correct and has a solid ground. The auditor has reviewed the risk assessment, compared the findings with other existing risk assessments (FSC and EUTR), did further research in literature and consulted with stakeholders. It was concluded that the risk designation defined by the BP is correct and supported with sufficient evidence.

As no indicator was evaluated as specified risk and therefore no mitigation measure was needed.

6.2 Specified risk indicators and mitigation measures

Country/Area	Indicator	Specified risk description	Mitigation measure
N/A	N/A	N/A	N/A

7 Non-conformities and observations

NC number NC-000326	NC Grading: Minor
Standard:	SBP Standard 4: Chain of Custody
Requirement:	5.1.2 The legal owner shall implement all aspects of the SBP-approved CoC system requirements for the SBP feedstock and biomass. Where there is a conflict between the requirements in the SBP-approved CoC system requirements and those specified in the SBP standards, the SBP standards shall have precedence. Note: SBP feedstock or biomass will not necessarily enter into the scope of the SBP-approved CoC system certification, but the SBP-approved CoC system CoC processes and requirements shall extend to SBP feedstock and biomass.
Description of Non-conformance and Related Evidence:	
The organization has established the conversion factor based on the input and output ratio. However, the organization does not have clearly established the conversion factor for each step and also the organization does not record the material left in the port after the vessel is loaded. The internal quality management system does not fully cover the system for calculation of the conversion factor with specific values which should be used for each step where conversion is taking place. As the value of the conversion factor is in line with the commonly used in the sector and the responsible person has provided good understanding of the steps where conversion is taking place, this NCR is classified as minor.	
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:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number NC-000329	NC Grading: Minor
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.3
Requirement:	6.7.2 The quantity shall be evaluated by one or both of the following methods: Monitoring by the BP at the plant gate (weighbridge) and/or

	at the end of the production chain. If the production amount is based on the quantity of biomass leaving the plant, any significant stock variation between the beginning and end of the production period shall be taken into account. The BP shall justify any changes in stock levels to the CB, and this shall be recorded in the SAR; or • Invoices to the End-users covering the sales during the period, if the accounting system guarantees that all invoices are taken into consideration. Sales figures and transport documents can be used for verification, and they shall be consistent with the production volume (including adjustments reflecting any stock variation). Note: It is recommended that both methods are used together.
Description of Non-conformance and Related Evidence:	
The organization has provided the value of the produced biomass during the reporting period in the SAR document. However, the stock of material at the beginning and end of the period was not considered. As the difference between the initial and final stock for any of the port is insignificant this NCR is considered as minor.	
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:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number NC-000328	NC Grading: Minor
Standard:	Instruction Document 5E: Collection and Communication of Energy and Carbon Data 1.3
Requirement:	5.1.2 A SBP Transaction Claim is only valid if it is shared and accepted in the DTS.
Description of Non-conformance and Related Evidence:	
The organization is aware about the requirement that all SBP sales should be done through DTS where each of the sale shall be recorded. In one case, the sale of SBP material was done by providing information about the SBP certification on the invoice but such sales was not recorded in the DTS. Additionally, in one case, the sale done in DTS was not accepted by the client and the BP did not identify why this happened and if there is any issues with the transaction. As both these issues are isolated issues and not a systematic problem, this NCR is classified as minor.	
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:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number NC-000327	NC Grading: Observation
Standard:	SBP Standard 1: Feedstock Compliance Standard
Requirement:	2.2 Normative elements in this Standard
Description of Non-conformance and Related Evidence:	
<p>The organization has justified the risk (indicator 2.2.1) for appropriate assessment of impact based on the fact that medium and large size FMUs are having FMP developed and approved and small FMUs are in vast majority grouped in some kind of association - "Forstbetriebsgemeinschaften" (FBG), "Forstbetriebsverbänden" (FBV) or "Waldwirtschaftsgenossenschaften" (WWG) which are bound to the same legal requirements as large FMUs (based on the accumulated forest area of all members). The rest of the small FMUs are managing negligible volumes. From the description is not however clear if the associations are obliged to have some kind of FMP and are bound to follow it. Considering the fact that there is system to control the forest management even for private forest owners without FMP ("Private forest organizations, which are bound only to ten-year planning, are thus controlled every ten years and, if the forests are not sustainably managed, the organizations are sentenced. For small forests with no planning, statutory possibilities for punishment do exist, if laws are not adhered to. A control mechanism, not to be underestimated, is the public.") this is considered as observation.</p>	
Timeline for Conformance:	N/A
Evidence Provided by Company to close NC:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	N/A

NC number NC-000324	NC Grading: Minor
Standard:	SBP Standard 1: Feedstock Compliance Standard

Requirement:	2.1 General Principles
Description of Non-conformance and Related Evidence:	
BP provides findings, means of verification and evidences reviewed in their SBE about the health and vitality of forest and low risk is considered for this indicator. However, the risk assessment does not address the impact of the high numbers of game in the forest on natural regeneration which is reported as one of the problems in German forestry.	
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:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

NC number NC-000325	NC Grading: Minor
Standard:	SBP Standard 2: Verification of SBP-compliant Feedstock
Requirement:	IN2C; 4.1 The report shall be concise, covering the most important features, and shall be completed using the latest version of the SBR template for Biomass Producers downloaded from the SBP website.
Description of Non-conformance and Related Evidence:	
The BP has submitted updated SBR. The updated SBR was evaluated by the auditor and following deficiencies were identified: 1) the % of harvested round wood used for biomass in Germany and Poland is not mentioned in section 2.1 2) In case of Germany information under 2.3 is from 2002 – 2012 which is considered to be outdated 3) Approximate number of suppliers are not mentioned in the SBR section 2.1 4) The UICN and CITES species are missing for Poland in section 2.1 5) Updates (section 13) is not filled in	
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:	N/A
Findings for Evaluation of Evidence:	N/A
NC Status:	Open

8 Certification decision

Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Pilar Gorria
Date of decision:	05 Mar 2021
Other comments:	N/A