

Supply Base Report: Skovdyrkerforeningen Midt A.M.B.A.

Main (Initial) Audit

www.sbp-cert.org



Completed in accordance with the Supply Base 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

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Annex 1: Detailed findings for Supply Base Evaluation indicators

Approval of report

10

1 Overview

Producer name: Skovdyrkerforeningen Midt A.M.B.A.

Producer address: Parallelvej 9a, 8680 Ry, Denmark

SBP Certificate Code: SBP-08-50

Geographic position: 56.090000, 9.781220

Primary contact: Peter Sejr, +45 86 89 32 22 or +45 23 48 35

45,pse@skovdyrkerne.dk

Company website: www.skovdyrkerne.dk/midt

Date report finalised: 02 Jul 2021

Close of last CB audit: 28 May 2021

Name of CB: NEPCon OÜ

SBP Standard(s) used: 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 1.4

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

SBP Endorsed Regional Risk Assessment: Denmark

Weblink to SBR on Company website: https://www.skovdyrkerne.dk/midt/skovdrift/flis/

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations					
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance	Re-assessment
×					

2 Description of the Supply Base

2.1 General description

Feedstock types: Primary, Secondary

Includes Supply Base evaluation (SBE): Yes

Feedstock origin (countries): Denmark

2.2 Description of countries included in the Supply Base

Country: Denmark

Area/Region: Jutland, DK

Exclusions: No

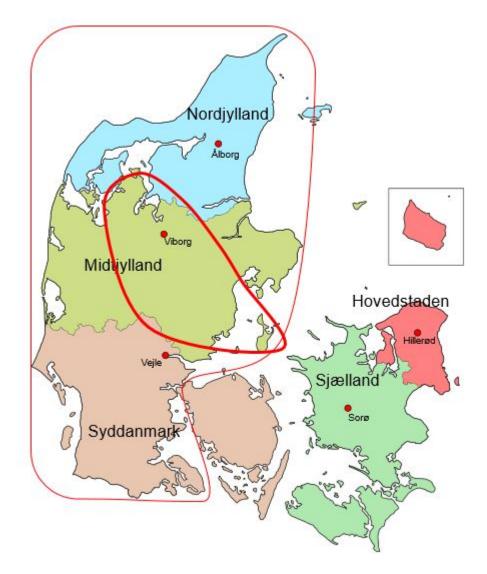


Figure 1: The supply base is from the region "Midtjylland", occasionally "Sydjylland" and "Nordjylland". The main area of forest activities (approx. 90%) is harvested in the eastern/center part of Jutland (area within the thick red line).

2.3 Actions taken to promote certification amongst feedstock supplier

SMI have since 2007 been approved to hold a PEFC group certificate. SMI is also approved to assist forest owners to be certified under the FSC group certificate.

SMI has embraced the SBP standard as a mean to ensure the procurement of sustainable biomass in a scheme that is affordable for small scale forestry. Skovdyrkerne have been a strong driver and stakeholder in the process towards a Regional Risk Assessment on a national level in Denmark.

SMI implements SBP risk assessment and mitigation measures in procurement of all primary feedstock - both biomass and timber - and through our Supplier Verification Programme we reach out to further increase the level of sustainability within our geographical work range.

2.4 Quantification of the Supply Base

Supply Base

- a. Total Supply Base area (million ha): 0,49
- b. Tenure by type (million ha):0.37 (Privately owned), 0.11 (Public), 0.00 (Community concession)
- c. Forest by type (million ha):0.00 (Boreal), 0.49 (Temperate), 0.00 (Tropical)
- d. Forest by management type (million ha):0.40 (Plantation), 0.08 (Managed natural)
- e. Certified forest by scheme (million ha):0.16 (FSC), 0.22 (PEFC)

Describe the harvesting type which best describes how your material is sourced: Mix of the above **Explanation:** We use both clearcutting and thinning as harvesting method. A clearcutting field is normally max 5 ha.

Was the forest in the Supply Base managed for a purpose other than for energy markets? Yes - Majority

Explanation: The forests are managed for timber production.

For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling? Yes - Majority

Explanation: The majority of the forests Skovdyrkene Midtjylland work with is required by danish law to be kept as forest - keep a natural regeneration. For the majority of clearcuttings we plant within the following year.

Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation? Yes - Minority

Explanation: Sometimes we have a storm or problem with beetles. That is for the minority.

Feedstock

Reporting period from: 01 May 2021

Reporting period to: 30 Apr 2022

- a. Total volume of Feedstock: 1-200,000 tonnes
- **b. Volume of primary feedstoc**k: 1-200,000 tonnes
- c. List percentage of primary feedstock, by the following categories.
 - Certified to an SBP-approved Forest Management Scheme: 1% 19%
 - Not certified to an SBP-approved Forest Management Scheme: 80% 100%
- d. List of all the species in primary feedstock, including scientific name: Acer pseudoplatanus (Sycamore); Fraxinus excelsior (Ash); Carpinus betulus (Hornbeam); Betula pubescens (white beach); Betula pendula (silver birch); Pinus mugo (N/A); Populus tremula (N/A); Fagus sylvatica (N/A); Pinus contorta (N/A); Chamaecyparis lawsoniana (N/A); Pseudotsuga menziesii (N/A); Quercus robur (N/A); Quercus petraea (N/A); Ulmus glabra (N/A); Juniperus communis (N/A); Prunus avium (N/A); Abies grandis (N/A); Corylus avellana (N/A); Aesculus hippocastanum (N/A); Picea glauca (N/A); Crataegus laevigata (N/A); Crataegus monogyna (N/A); Tilia cordata (N/A); Larix decidua (N/A); Larix kaempferi (N/A); Larix eurolepis (N/A); Acer campestre (N/A); Abies procera (N/A); Abies nordmanniana (N/A); Picea omorika (N/A); Salix spp (N/A); Populus spp (N/A); Quercus rubra (N/A); Alnus glutinosa (N/A);

Picea abies (N/A); Sorbus aucuparia (N/A); Sorbus intermedia (N/A); Picea sitchensis (N/A); Pinus sylvestris (N/A); Acer platanoides (N/A); Taxus baccata (N/A); Thuja plicata (N/A); Tsuga heterophylla (N/A); Juglans nigra (N/A); Abies alba (N/A); Pinus nigra (N/A);

- e. Is any of the feedstock used likely to have come from protected or threatened species? No
 - Name of species: N/A
 - Biomass proportion, by weight, that is likely to be composed of that species (%): N/A
- f. Hardwood (i.e. broadleaf trees): specify proportion of biomass from (%): N/A
- g. Softwood (i.e. coniferous trees): specify proportion of biomass from (%): N/A
- h. Proportion of biomass composed of or derived from saw logs (%): N/A
- i. Specify the local regulations or industry standards that define saw logs: N/A
- j. Roundwood from final fellings from forests with > 40 yr rotation times Average % volume of fellings delivered to BP (%): N/A
- k. Volume of primary feedstock from primary forest: 0 N/A
- I. List percentage of primary feedstock from primary forest, by the following categories. Subdivide by SBP-approved Forest Management Schemes:
 - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme: N/A
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme: N/A
- m. Volume of secondary feedstock: 1-200,000 tonnes
 - Physical form of the feedstock: Chips
- n. Volume of tertiary feedstock: 0 N/A
 - Physical form of the feedstock: N/A

Prop	oortion of feedstock sourced per type o	f claim during the reporting p	eriod	
Feedstock type	Sourced by using Supply Base Evaluation (SBE) %	FSC %	PEFC %	SFI %
Primary	90,00	0,00	10,00	0,00
Secondary	100,00	0,00	0,00	0,00
Tertiary	0,00	0,00	0,00	0,00
Other	0,00	0,00	0,00	0,00

3 Requirement for a Supply Base Evaluation

Is Supply Base Evaluation (SBE) is completed? Yes

Skovdyrkerne Midt adopts the 'The Regional Risk Assessment for Denmark'. The RRA is prepared according to SBP Regional Risk Assessment Procedure Version 1.0 and is a thorough investigation of relevant risks in a Danish forest management context.

4 Supply Base Evaluation

4.1 Scope

Feedstock types included in SBE: Primary, Secondary

SBP-endorsed Regional Risk Assessments used: Denmark

List of countries and regions included in the SBE:

Country: Denmark

Indicator with specified risk in the risk assessment used:

2.1.1 The 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.

Specific risk description:

Forests and other areas with high conservation values in the Supply Base are identified and mapped.

Country: Denmark

Indicator with specified risk in the risk assessment used:

2.1.2 The 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.

Specific risk description:

Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.

Country: Denmark

Indicator with specified risk in the risk assessment used:

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).

Specific risk description:

Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).

Country: Denmark

Indicator with specified risk in the risk assessment used:

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

Specific risk description:

Biodiversity is protected (CPET S5b).

4.2 Justification

Skovdyrkerne Midt adopts the 'The Regional Risk Assessment for Denmark'. The RRA is prepared according to SBP Regional Risk Assessment Procedure Version 1.0 and is a thorough investigation of relevant risks in a Danish forest management context.

The RRA concludes that there is a specified risk for 4 indicators; all related to mapping and protection of areas of high conservation values (HCV) in the supply base. When an area of high conservation value is mapped and defined, it is possible to identify and address potential threats from forest harvest operations, and hence conserve and protect key ecosystems and the adjacent biodiversity.

However, in a Danish context coniferous species are all imported and therefore not a part of a natural forest type. The biodiversity is sparse and in case of thinning operations there is no negative impact on the biodiversity. This justifies making a sub-scope including all feedstock sourced from coniferous thinning operations.

In the same way, first generation afforestation holds no high conservation value that can be negatively affected by a harvest operation. Therefore harvesting operations in forests established as first generation afforestation are all low risk.

A forestholding with a forest management certificate has a detailed description of the forest including a detailed map with areas in the forest that have a high conservation value (specific HCV map). All risks are low when consulting the map prior to sourcing biomass from broadleaved stands or clear cuts.

For the group in the scope that contains areas without a forest management certificate, there is a specified risk that areas of high conservation value have not been mapped. A further consultation of the HNV forest map is needed prior to sourcing biomass from thinning in broadleaved stands or clear cuts from areas that are not first generation afforestation.

SMI has implemented a procedure where all harvesting areas of primary feedstock are assessed according to the above sub-scopes prior to biomass production. The procedure is described in the management system and all staff is educated in the procedures.

The last group in the scope that contains secondary feedstock from a local sawmill has a PEFC-claim and is therefor 100% SBP-compliant and low risk.

4.3 Results of risk assessment and Supplier Verification Programme

There is a coherency between identifying areas with high conservation values and being able to conserve habitats and protect the biodiversity. There is also a coherency between threats to high conservation value and the type of forest operation and forest type.

The HCV are identified and mapped in some forestholdings (FSC/PEFC certified forestholdings) and in other areas there is a specified risk that there may be unidentified areas with high conservation values.

Thinning operations in coniferous stands and in first generation afforestation is always low risk.

The supply base is therefore divided in the following sub-scopes:

- Primary feedstock sourced from coniferous thinning operations all low risk
- Primary feedstock sourced from areas of first generation afforestation all low risk
- Primary feedstock sourced from a forest holding with a FM certificate (FSC/PEFC) all low risk
- Primary feedstock sourced from a forest holding without a FM certificate (FSC/PEFC) specified risk
- Primary feedstock sourced from non-forest areas all low risk
- Secondary feedstock sourced from supplier with a valid certificate all low risk

The RRA has low risk or specified risk in all indicators. Therefore SVP is not applicable in this SBR. See discription of mitigation measures.

4.4 Conclusion

The organisation meets SBP requirement due to a concise approach to risk assessment, where the supply base is divided in 8 different sub-scopes. The competent staff at Skovdyrkerne Midt all have a degree as B.sc or M.sc in forestry and they are able to identify the registered HCV areas within the supply base and determine in which operation a field assessment is demanded. Mitigation methods are described in the plan and also the screening that is handed to the contractor prior to harvest.

External suppliers can provide FSC/PEFC certified feedstock as SBP-compliant feedstock if they hold a valid PEFC CoC or FSC CoC certificate – or if the feedstock can be determined as 'low risk' according to the same criteria's as included in the SBE.

The strength of this approach is:

- It provides the necessary protection of biodiversity in harvesting areas.
- It is integrated in the workflow at Skovdyrkerne Midt and thus feasible and controllable.

5 Supply Base Evaluation process

The Supply Base evaluation process was initiated by the Regional Risk Assessment for Denmark. Skovdyrkerne Midt has by the representation of Skovdyrkerne Vestjylland been an indirect stakeholder in the process leading to the decision of making an RRA for Denmark. Through Skovdyrkerne Vestjylland has De Danske Skovdyrkerneforeninger also played an active role in the RRA stakeholder consultation meeting on May 20th 2016, where the stakeholders were invited to see how Skovdyrkerne in Vestjylland asses risks and implement mitigation measure in two different harvest operations:

- · thinning operation in coniferous stands
- · thinning operation in an old broadleaved stand

After the stakeholder meeting Skovdyrkerne Vestjylland has submitted stakeholder comments to the RRA. The comments were submitted on June 26th 2016.

This Supply Base Report (SBR) describes how Skovdyrkerne Midt will assure that sourcing of biomass is SBP-compliant. The original SBR will be submitted for public consultation after its 'Main (initial) Evaluation'.

6 Stakeholder consultation

The stakeholder consultation took place in a 30 day period from March 31th 2021 to April 30th 2021

The SBR were submitted by e-mail to:

Danmarks Naturfredningsforening FSC Danmark Verdens Skove WWF (Verdensnaturfonden) PEFC Danmark Dansk Fjernvarme Dansk Skovforening Skanderborg Hørning Fjernvarme Friluftsrådet	Lars Midtiby Kristian Jørgensen Jens Holm Kanstrup Sofie Tind Nielsen Morten Thorøe Maria Hedegaard Marie-Louise Bretner Peter Jensen Thorbjørn Eriksen	lars@dn.dk k.jorgensen@dk.fsc.org jhk@verdensskove.org s.tind@wwf.dk mt@pefc.dk mh@danskfjernvarme.dk mlb@skovforeningen.dk pj@skfj.dk toe@friluftsraadet.dk gunde.odgaard@batkartellet.dk
BAT Kartellet	Gunde Odgaard	J J
Skanderborg Kommune	Søren Peder Knudsen	soren.knudsen@skanderborg.dk
Odder Kommune	Merete Johannsen	merete.johannsen@odder.dk
Favrskov Kommune	Carsten Monsrud	cmon@favrskov.dk
Dansk Ornitologisk Forening	Henrik Wejdling	henrik@wejdling.dk
Horsens Kommune	Bo Karlshøj Riis	bri@horsens.dk
Viborg Kommune	Rune Rauff Schultz	rus@viborg.dk
Vedvarende Energi	Bjarke Rambøll	br@ve.dk

6.1 Response to stakeholder comments

Description: Verdens Skove (Jens Holm Kanstrup)

Comment:

Comment translated to english: "As I rightfully remember it, the problem I mention is addressed in section 2.2.4. [in the RRA] but is referred to section 2.1.1. [from the RRA] which purpose is no High Conservation Values will be found in your feedstock but it does not address the problem raised in section 2.2.4. [in the RRA] regarding veteran trees and dead wood in forests without FSC certificate (I don't remember the legislation in the latest PEFC standard – but it is possibly on the same level as FSC in regards to keeping veteran trees for natural death). At best we would propose especially non-indigenious trees above a specific diameter could not be found in the category for biomass. Though we have been explained by NEPcon (Preferred by Nature) and Ørsted, that these mentioned trees only hold a very small part of the biomass that is produced in general, therefore it should not be a problem in regards to the produced feedstock in your system - but as you probably know, it has a BIG significance for the biodiversity that few old trees, fallen trees etc stays in the forest. Therefore I would recommend (which I already have to SBP, Ørsted and others in the sector) that there will be developed an indicator to section 2.2.4. [in the RRA] which addresses valuable veterantrees so these won't end up in the production of biomass where, as I believe most will agree on, these trees do not belong. I know this is not a guarantee for these trees to be left standing but then it won't be Skovdyrkerne og the energy sector who gets blamed for the felling of them."

Response:

Mitigation measures have been expanded with following comment: Furthermore we have received a comment during the stakeholder consultation, which can be found in section 6.1. The comment is mostly regarding the RRA, indicator 2.2.4. Skovdyrkerne Midt will however express the importantcy in following the legislation in the RRA. There is a required focus for biological valuable dead wood (standing or laying) not to be included in the production of biomass or to be destroyed during the production. This topic has also been discussed in the RRA, p. 15-16. Section 9.1.3 in this report also addresses the importance in leaving biologically valuable dead or decaying wood in the stand during harvest operations. There will be a chance for larger non-indigenious tress to be part of the produced feedstock, where these have been selected as high valued timber first. This is also mentioned in this SBR table 2, section 2.3. If BP develops an indicator for such trees, as suggested in the comment, this will have consequences for the timberproduction in Skovdyrkerne Midt and this is not a desirable outcome. Additionally Skovdyrkerne Midt has a responsibility to the private forestowner for their wishes/visions and economy, which is upheld within the legislations of SBP and general Danish laws. During the process of being SBP certified BP has reevaluated the procedures of biomassproduction. The regierements during production have been tightened, the focus have been reinforced and BP has an ongoing inhouse education-course. BP will stay informed in regards to changes in the RRA.

7 Mitigation measures

7.1 Mitigation measures

Country: Denmark

Specified risk indicator: 2.1.1 The 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.

Specific risk description: Forests and other areas with high conservation values in the Supply Base

are identified and mapped.

Mitigation measure:

All harvest operations are planned and supervised by own forest staff

(B.Sc. or M.Sc. in forestry).

a. All staff is trained in the below procedures.

b. All staff is trained in identifying areas of high conservation value according to the catalogue of key biotopes within the supply base. All operations are supervised and mapped for high conservation values.

Country: Denmark

Specified risk indicator: 2.1.2 The 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.

Specific risk description: Potential threats to forests and other areas with high conservation values

from forest management activities are identified and addressed.

Mitigation measure:

All harvest operations are planned and supervised by own forest staff

(B.Sc. or M.Sc. in forestry).

a. All staff is trained in the below procedures.

b. All staff is trained in identifying areas of high conservation value according to the catalogue of key biotopes within the supply base. All

operations are supervised and mapped for high conservation values.

Country: Denmark

Specified risk indicator: 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).

Specific risk description: Key ecosystems and habitats are conserved or set aside in their natural

state (CPET S8b).

Mitigation measure:

The screening (document with information and map of harvest area and HCV-values) is e-mailed to the sub-contractors who is instructed to respond if there is a SBP status without a corresponding conclusion and description of the mitigation measures.

A screening assesses the operationareas HCV values, compliance with danish laws and EUTR with:

i. Nature Protection Law §3

ii. Natura 2000-areas

iii. Protected areas or monuments

iv. HNV forest online map

The conclusion is described in the screening.

Country: Denmark

Specified risk indicator: 2.2.4 The BP has implemented appropriate control systems and procedures

to ensure that biodiversity is protected (CPET S5b).

Specific risk description: Biodiversity is protected (CPET S5b).

Mitigation measure:

See the other three mitigation measures. These will also indicate that biodiversity will be protected. Both with HNV forest online map and forest staff (B.Sc. or M.Sc. in forestry) is trained in identifying areas with high conservation value and therefore biodiversity.

Also see the comment

7.2 Monitoring and outcomes

With respect to the precautionary principle it is decided, that:

- · When harvesting in 'Value 4' areas (Value 4 the harvest operation and the resulting biomass is SBP-non-compliant (but still legal according to EUTR).
-)- work instructions must be emailed cc. to the internal auditor (pse@skovdyrkerne.dk). The screening will be reviewed and mitigation measures evaluated prior to felling.
- · Secondary feedstock suppliers will be assessed by the primary biomass manager and internal auditor Peter Sejr (pse@skovdyrkerne.dk). The following chapter also describes this process.

8 Detailed findings for indicators

Detailed findings for each Indicator are given in Annex 1 in case the Regional Risk Assessment (RRA) is not used.

Is RRA used? Yes

9 Review of report

9.1 Peer review

No peer review has been conducted

9.2 Public or additional reviews

No external review has been conducted. The report is available at the webpage of Skovdyrkerne Midt but no comment has been raised.

10 Approval of report

Approval of Supply Base Report by senior management					
Report Prepared	Tanja S. Hansen	M.sc In Forestry	02 Jul 2021		
by:	Name	Title	Date		
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.					
Report approved	Kristian Løkke Kristensen	Forest Manager (CEO)	02 Jul 2021		
by:	Name	Title	Date		

Annex 1: Detailed findings for Supply Base Evaluation indicators

N/A