



# Supply Base Report: Alstrup Skovservice ApS

Second Surveillance Audit

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**The promise of good biomass**



# Completed in accordance with the Supply Base 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](http://www.sbp-cert.org)*

## *Document history*

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## 2 Description of the Supply Base

### 2.1 General description

**Feedstock types:** Primary

**Includes Supply Base evaluation (SBE):** Yes

**Includes REDII:** Yes

**Includes REDII SBE:** Yes

**Feedstock origin (countries):** Denmark

### 2.2 Description of countries included in the Supply Base

**Country:**Denmark

**Area/Region:** Danmark

**Sub-Scope:** N/A

**Exclusions:** No

#### **General description of Danish forests and forestry**

Forests cover approx. 633,000 ha in Denmark, corresponding to approx. 14.4% of the country's total area.

This area is expected to increase over time. Total standing timber in Danish forests is 130 million m<sup>3</sup>.

Standing timber in the forests has been increasing rapidly from the 2000 statement until today. This is a result of the steadily increasing forest area and probably an increase in standing timber per hectare.

Generally, Danish forests include a wide variety of wood species of which the most common species are: Norway spruce 13%, beech 13% and oak 12%. The numbers for the other wood species are: pine 11%, silver spruce 6%, Nordmann fir 5%, noble fir 2%, other fir species 10%, Sycamore maple 4%, birch 7%, ash 2% and other broadleaves 9%. In addition to this, unstocked areas are 4%. Broadleaves make up 44 per cent of the total wooded area whereas conifers make up 36 per cent. The rest is unstocked areas and areas where a particular wood species could not be determined. None of the wood species belong to the CITES or IUCN species.

Approx. 2000 species are listed on the Danish Red List, and many of these species are related to forests, old forests in particular. Areas in which one or more red list species have been identified are often registered as Natura 2000 areas, protected by the Danish Forest Act and/or the Danish Nature Protection Act.

The estimated total number of forest estates in Denmark is 24,000. 89% of the total number of forest estates has a size between 0.5 and 20 ha.

Most of the forest area is privately owned, either by individuals (59%) or by companies (10%) and foundations (6%). The Danish state forests make up 19% of the total forest area, while the area owned by municipalities and public institutions is 6%. This means that the Danish forest structure includes many private owners with forest areas of less than 20 ha.

Atypically, Danish forestry legislation has no requirements as to how each estate plans forestry, nor does the forest owners have to apply for or report cutting in their forests.

Danish forest owners are well-organised in various local and national associations. Dansk Skovforening (Danish Forest Association) is the trade organisation of private forest owners.

Moreover, up to 6,000 owners of small forests are organised in local forest owner associations which help owners with advice and management of their forests and are also involved in forest policy. Similarly, many private forest owners also work with HedeDanmark and other forestry consultancies.

Two certification options exist in forest management: PEFC and FSC. The areas owned by the Danish states have been certified according to both standards. In private and municipal forests, some 56,000 ha have been certified according to PE and 20,161 ha according to FSC.

Total income in the production of forest products in Denmark is approx. DKK 1 billion. The sale of energy wood amounted to DKK 300 million in 2015.

#### General description of Danish windbreaks

Planted windbreaks are a tradition in Denmark. The systematic planting of windbreaks started in the 1930s. The first major windbreak planting guilds were set up in 1967 and windbreaks with mainly 3 and 6 rows of broadleaves were introduced. Since then, various subsidies have existed to establish windbreaks and most have been established with subsidies. Today, Denmark is estimated to have some 80,000 km of windbreaks.

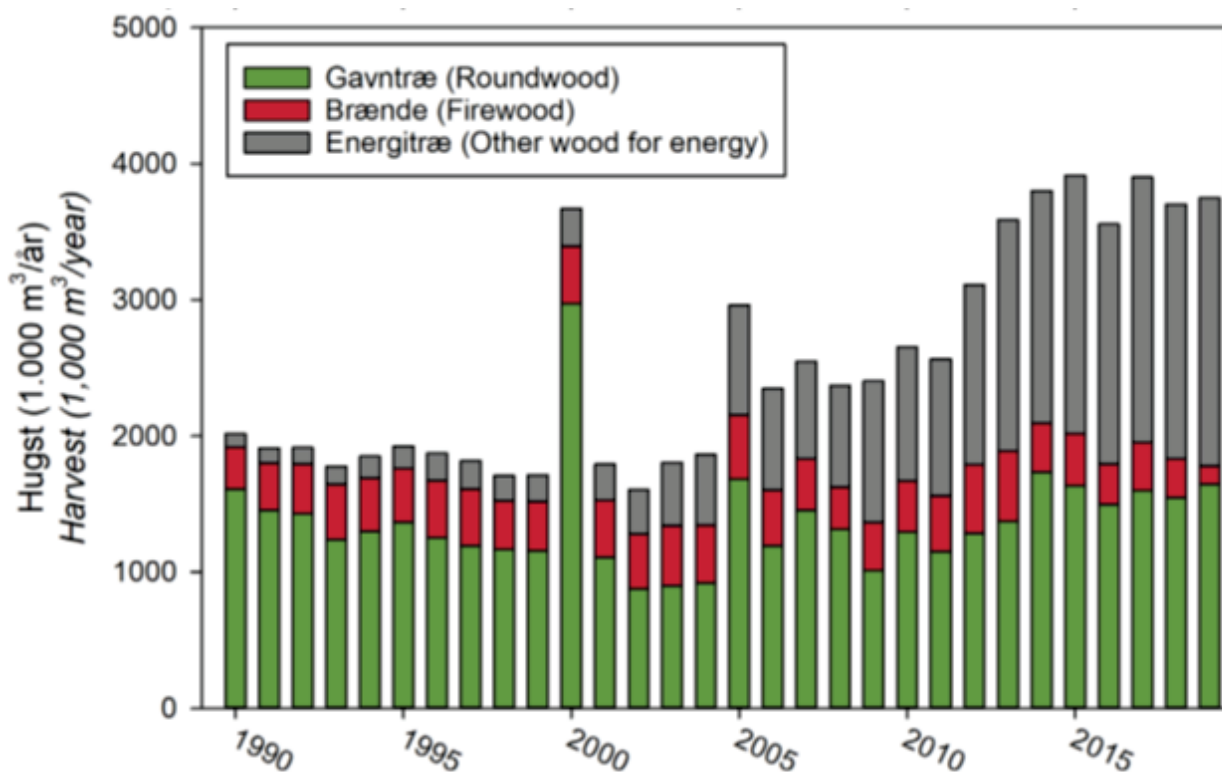
Windbreaks planted with subsidies must be maintained and cannot be removed.

#### Description of the supply base

Alstrup Skovservice's supply base is Danish forests, windbreaks, nature areas and urban plantations, all over Denmark, mainly in Mid-Jutland.

Figure 1 Supply base

Alstrup Skovservice is a forest contractor that produces and sells wood chip. Wood chip production is approx. 35,000 - 45,000 tonnes a year, approx. 50% of the wood chip is produced in areas outside forests, mainly windbreaks and small plantations and in connection with nature projects. The base also includes clearing of trees and shrubs in connection with developments and expansion of infrastructure in Denmark. In the forests, the base is thinning in conifers and roundwood from conifer deforestation while the rest is branches and tops from both broadleaves and conifers.



Harvested volume of broadleaves and conifers (Statistikbanken.dk/SKOV6: Felling in forests and plantations in Denmark by time, area, area and type of wood).

## 2.3 Actions taken to promote certification amongst feedstock supplier

No No measures have been launched to further certification at the forests where raw materials are felled.

## 2.4 Quantification of the Supply Base

### Supply Base

- a. **Total Supply Base area (million ha):** 0.63
- b. **Tenure by type (million ha):**0.43 (Privately owned), 0.16 (Public), 0.04 (Community concession)
- c. **Forest by type (million ha):**0.63 (Temperate)
- d. **Forest by management type (million ha):**0.58 (Managed natural), 0.05 (Natural)
- e. **Certified forest by scheme (million ha):**0.22 (FSC), 0.33 (PEFC)

**Describe the harvesting type which best describes how your material is sourced:** Mix of the above

**Explanation:** Thinnings: In windbreaks, the base mainly consists of the removal of nurse trees and pollarding of shrubs but in order to keep the sheltering effect of the windbreak. The work is carried out using feller bunchers and feller forwarders. In the forest, thinnings are carried out by feller bunching in connection with the running of tracks and thinning of younger standing crop. The subsequent chipping is carried out using an off-road chipper or a truck chipper. Tree tops: Chipping of tops and branches from conifers and broadleaves in connection with the deforestation of middle-aged or old broadleaves and conifers. Tops are often interconnected in stacks and chipped by the roadside. Round timber: Produced as a by-product from the felling of conifers where timber is also produced. The chip utilised timber of a low quality which cannot be used for products of high quality, such as timber. Felled using a harvester, forwarded to a solid road, chipped by the roadside or transported to a storage yard where the chipping is carried out. Clearcuts: Carried out by manual felling and subsequent forwarding or using a feller forwarder. Wood is often interconnected in stacks and chipped by the roadside. Clearing of tree regeneration in connection with Nature projects carried out in dialogue or in direct collaboration with the specific authorities. Energy crops: Mainly willow planted on farm land. Cut down every 3-4 years. Cut down with willow harvester and gather in stacks for wood chipping later

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

**Explanation:** In forest the main economic drive is production of timber.

**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 main part of the forest area is protected by law, and the law states that you have to plant or encourage natural regeneration, on areas protected by law (Skovloven)

**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:** A small amount of the feedstock are produced in areas that has been attacked by bark beetles or has tipped in storms.

**What is the estimated amount of REDII-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 3200000.00 tonnes

**Explanation:** According to the publication - The future of Danish wood chips towards 2050 - analysis and recommendations(1), it is estimated that the forests' production potential of biologically based carbon is between 3,200,000 and 5,500,000 tonnes of wood chips corresponding to 35-60 PJ. (1) Fremtiden for Dansk skov mod 2050 - Analyse og Anbefalinger, 2020, Træ til Energi.

<https://www.danskskovforening.dk/startside-2/politisk-arbejde/trae-til-energi/>

## Feedstock

**Reporting period from:** 28 Feb 2023

**Reporting period to:** 29 Feb 2024

- a. **Total volume of Feedstock:** 1-200,000 tonnes
- b. **Volume of primary feedstock:** 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:** Picea abies (Norway spruce); Picea sitchensis (Sitka spruce); Abies alba (Silver fir); Abies nordmanniana (Normann fir); Pinus sylvestris (Scots pine); Pinus nigra (Austrian pine); Populus spp (poplar); Salix spp (Willow); Pinus contorta (lodgpole pine); Fraxinus excelsior (Ash); Fagus sylvatica (Beech); Quercus spp (Oak); Betula spp (Birch); Pseudotsuga menziesii (douglas fir); Acer spp. (Sycamore); Larix spp (Larch); Abies procera (Nobel fir);
- 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 (%):
- f. **Hardwood (i.e. broadleaf trees): specify proportion of biomass from (%):** 40.00
- g. **Softwood (i.e. coniferous trees): specify proportion of biomass from (%):** 60.00
- h. **Proportion of biomass composed of or derived from saw logs (%):** 0
- 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 (%):** 0.00
- k. **Volume of primary feedstock from primary forest:** 0 tonnes
- l. **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: 0%
  - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme: 0%
- m. **Volume of secondary feedstock:** 0 N/A
  - Physical form of the feedstock:
- n. **Volume of tertiary feedstock:** 0 N/A
  - Physical form of the feedstock:
- o. **Estimated amount of REDII-compliant sustainable feedstock that could be collected annually by the BP:** 3200000.00tonnes



**Proportion of feedstock sourced per type of claim during the reporting period**

<b>Feedstock type</b>	<b>Sourced by using Supply Base Evaluation (SBE) %</b>	<b>FSC %</b>	<b>PEFC %</b>	<b>SFI %</b>
Primary	97.00	0.00	3.00	0.00
Secondary	0.00	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

*Note: Annex 1 is generated by the system if the SBE is used without Region Risk Assessment(s). Annex 2 is generated if RED II SBE is in the scope.*

#### **Is Supply Base Evaluation (SBE) is completed? Yes**

Alstrup Skovservice harvests most of the feedstock in non-certified forests, which means that the supply base must be evaluated.

New Danish regulations (VE direktiv) are introduced 30/06/2021 and are fully effective by 1/1/2022. The regulation is based on the EU RED II directive. In order to meet the requirements, Alstrup Skovservice has adapted biomass categories/types and reporting in compliance with the new legislation.

#### **Is REDII SBE completed? Yes**

In order to show compliance with RED II, Alstrup Skovservice has carried out an analysis of the requirements in RED II. Through the work with the Danish legislation for the production and sale of wood chips, Alstrup Skovservice is well acquainted with RED II, as the RED II requirements were implemented in the Danish legislation in 2021.

## 4 Supply Base Evaluation

*Note: Annex 2 is generated if RED II is in the scope.*

### 4.1 Scope

**Feedstock types included in SBE:** Primary

**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:**

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 as specified 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.**

**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:**

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 as specified 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.**

**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.**

**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:**

Based on the existing protection through the Forest Act and designation of Natura 2000 areas and individual protected areas, it 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 conclude that for these areas the risk is specified based on the same findings as for Indicators 2.1.1 and 2.1.2.**

**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:**

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.**

## 4.2 Justification

This evaluation is based on the Regional Risk Assessment (RRA) for Denmark published in 2017 The National Risk Assessment was completed in accordance with SBP Standard no. 1 and the evaluation was completed in accordance with SBP standard no. 2.

All items in RRA 1 have been answered and the risks have been assessed in connection with the preparation of the National Risk Assessment. Information has been gathered from applicable Danish legislation, instructions and interviews with the relevant persons.

Based on the recommendations in the RRA for measures to reduce the risk and analyse the company's procedures, useful measures to reduce the risk have been found to ensure a low risk for all indicators in connection with the production of primary feedstock.

Alstrup Skovservice is aware of the fact that changes in the RRA may occur and is willing to adapt the SBE if this should happen.

## 4.3 Results of risk assessment and Supplier Verification

### Programme

The Risk Assessment concludes that the risk is low in relation to all criteria except from the following criteria where a 'specified risk' has been identified and proposals have been prepared for possible measures to reduce the risk: Criteria 2.1.1, 2.1.2, 2.2.3 and 2.2.4. Proposals for measures to reduce the risk is based on the RRA, Alstrup Skovservice concluded that the supply base can be divided into the

following sub-scopes:

1. Primary feedstock from FSC or PEFC certified forests
2. Primary feedstock from forests with a green management plan, **incl. key biotopes mapping (low risk) or excl. key biotopes mapping (specified risk)**
3. Primary feedstock from thinnings of conifer stands
4. Primary feedstock from thinnings of first generation forest estates
5. Primary feedstock from forests without a green management plan or certification **(specified risk)**
6. Primary feedstock from non-forest areas, such as windbreaks and nature projects **(specified risk)**
7. Primary feedstock from final fellings of non-native conifer stands
8. Primary feedstock from Wastewood, ex. parks, roads or infrastructure projects

Alstrup Skovservice has no need for a supplier verification programme. Alstrup Skovservice will only in special cases purchase biomass from other suppliers, and if so, Alstrup Skovservice will handle risk assessment and minimise the risk, if any.

## 4.4 Conclusion

When reviewing and revising the procedures of Alstrup Skovservice based on the RRA, it is estimated that the company ensures that the biomass complies with the SBP certification. Gert Alstrup who handles job planning, identification of key biotopes and project mapping, has a wide experience in working in the forest and making considerations for nature worth conserving. The company is aware of the fact that if jobs have to be carried out in areas with a specific risk, it may be necessary to have other qualified persons, such as biologists or foresters, help with the identification of key biotopes. Internal review shows that there are almost no mistakes when discerning projects.

## 5 Supply Base Evaluation process

The National Risk Assessment has been completed by NEPCon at the initiative of Dansk Energi, Dansk Fjernvarme, Skovdyrkerforeningen, Danish Forest Association, DM&E and HedeDanmark.

As it appears from the National Risk Assessment for Denmark, a low risk has been identified for all indicators, apart from the following indicators where a 'specified risk" has been identified: 2.1.1, 2.1.2, 2.2.3, 2.2.4.

In order to minimise the risk of processing biomass, Alstrup Skovservice has prepared a set of procedures that complies with the due diligence requirements of the standard. The procedures are available in the Entreprenørhåndbogen (Contractor's Manual).

Alstrup Skovservice has used both internal and external resources for the work with SBE. SBE has been prepared with SBE's staff who has a wide experience in biomass production.

Alstrup Skovservice is owned by Gert Alstrup, who has 35 years of experience with forest and nature management. Independent forestry contractor since 1985. The first years with machine felling for Det Danske Hedeselskab and for Stats Skovene - now the Danish Nature Agency. After the storm of 2005, the company was expanded to be able to handle more jobs within felling, transport, piling of logs and trading in fresh wood and wood chip. In the last five years, Alstrup Skovservice has had more than 5 full-time employees that have produced according to FSC and PEFC certifications on the Danish Nature Agency's areas.

Alstrup Skovservice is used to handling nature projects in NBL § 3 and Natura 2000 areas.

If Alstrup Skovservice is in doubt, assistance is acquired from an external forester.

Machine operators at Alstrup Skovservice have a high level of skills with many years' work with production of feedstock in Danish state forests.

Alstrup Skovservice has used an external consultant from DM&E who has approx. 10 years' experience in forest certification and forest management for the work of adapting work processes and gathering additional data.

## 6 Stakeholder consultation

The consultation phase ran for a period of 30 days from March 2022 to April 2022. The Danish version of SBR was sent by e-mail to the following stakeholders:

Danmarks Naturfredningsforening (Danish Society for Nature Conservation)	Tine Skafte Nielsen	tsn@dn.dk
FSC Danmark	Søren D. Gure	s.grue@dk.fsc.org
Verdens Skove	<b>Caspar Olausson</b>	cao@verdensskove.org
WWF (World Wildlife Foundation)	Sofie Tind Nielsen	s.tind@wwf.dk
Copenhagen University	Vivian Kvist Johansen	vkj@ign.ku.dk
PEFC Danmark	Peter Bæk	pb@pefc.dk
Dansk Energi	Kristine van het Erve Grunnet	keg@danskeenergi.dk
Dansk Fjernvarme	Maria Hedegård	mh@danskfjernvarme.dk
Dansk Skovforening (Danish Forest Association)	Marie-Louise Bretner	mlb@skovforeningen.dk
Energistyrelsen (Danish Energy Agency)	Nora Skjernaa Hansen	nshn@ens.dk
Ørsted Energy	Lisbeth Sevel	LISLS@orsted.dk
Friluftsrådet (National Federation of Outdoor Recreation)	Thorbjørn Eriksen	toe@friluftsradet.dk
BAT Kartellet	Gunde Odgaard	gunde.odgaard@batkartellet.dk
Naturstyrelsen (Danish Nature Agency)	Niels Bølling	niboe@nst.dk
NOVOPAN A/S	Jette Wulff	j.wulff@kronospan-dk.dk
Troldtekt A/S	Orla Jepsen	oje@troldtekt.dk
Rold Skov Savværk A/S	Henrik Thorlacius- Ussing	htu@lindenberg.dk
DTE	Christian Rødin-Nielsen	can@dte.dk

### 6.1 Response to stakeholder comments

# 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:**

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 as specified 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.**

**Mitigation measure:**

Alstrup Skovservice is working according to the procedures of the Contractor's Manual, which is laid out to consider the indicators described in the National Risk Assessment. The Contractor's Manual describes how to identify a specific risk and which measures to reduce the risk should be taken before the feedstock can be called SBP compliant. If Alstrup Skovservice is not able to reduce the risk for parts of the biomass, it will not form part of the SBP quantity.

Projects in Alstrup Skovservice are planned, assigned and controlled by Gert Alstrup.

The risk assessment is based on available map material and databases as well as a review of the area before startup. A map and checklist is prepared for each job to ensure that the machine operator is aware of protected or preserved nature/culture. Alstrup Skovservice has implemented the measures to reduced risk from the National Risk Assessment, except from the proposal to share maps with experts or relevant stakeholders.

Primary feedstock from FSC or PEFC certified forests - **Always low risk**

2. Primary feedstock from forests with a green management plan, **incl. key biotopes mapping (low risk) or excl. key biotopes mapping (specified risk)**
3. Primary feedstock from thinnings of conifer stands - **Always low risk**
4. Primary feedstock from thinnings of first generation forest estates - **Always low risk**
5. Primary feedstock from forests without a green management plan or certification (**specified risk**)
6. Primary feedstock from non-forest areas, such as windbreaks and nature projects (**specified risk**)
7. Primary feedstock from final fellings of non-native conifer stands - **Always low risk**
8. Primary feedstock from Wastewood, ex. parks, roads or infrastructure projects - **Always low risk**

The risk assessment is carried out by Gert Alstrup. If external assessment is deemed necessary, a forrester/biologist with local knowledge will be used. Gert Alstrup is familiar with identifying key biotopes according to the key biotope type catalogue.

**Risk handling**

Staff carrying out screenings and planning the jobs are familiar with applicable nature and environment legislation. Alstrup Skovservice plans supply activities to minimise the negative effect on ecosystems, biodiversity and areas worth preserving.



Areas where wood chip is harvested must be examined before startup by a physical review and must be mapped according to the procedure below. All procedures are explained in the Contractors' Manual. A map will be prepared for each wood chip project. If maps have been prepared in connection with certification or a green management plan, these maps must be used in the process in order to ensure HCV areas.

- If the work area is located in a forest, it will be screened according to the checklist in the Contractors' Manual.
- If the job consists of thinning in an afforestation or thinning/clearcut in an even age, even aged conifer stand, screening is done.
- If the work area is located outside a forest, screening may be omitted. Legality must be ensured.
- Each wood chip project is given a unique case number and address which also appear on the job description, weighing forms and basis of settlement. Ensure traceability.
- Each wood chip project has a Checklist with relevant information. Ensure excellent communication between the various parties in the work process and note down all relevant data which the machine operator needs.

To be able to identify HCV areas during work, all machine operators working with wood chip production in the forest have been trained in "Maskinfærdsel på Naturnære arealer" (Machine traffic in nature areas). For all suppliers (forest owners), Alstrup Skovservice enters into an agreement with the forest owner on the task, Alstrup Skovservice is always physically out to inspect project areas. They are responsible for the entire process. I.e. Planning of the task, execution of the task, as well as transport and sale of wood chips. The procedure for purchasing external wood chips will be that Alstrup Skovservice treats the purchase of wood chips from subcontractors as if they were their own projects. Alstrup Skovservice is responsible for mapping, risk assessment, review of the area and risk minimization.

An agreement has been entered into for the supply of biomass from a supplier that is an "Godkendt Biomasseproducent" (Approved Biomass Producer) and to supply biomass in accordance with the Industry Agreement Industry agreement on securing sustainable biomass (wood pellets and wood chips). Alstrup Skovservice has the right to carry out inspections of the projects.

To ensure that SBP projects are properly categorized and that screening is performed according to the procedures, 10 % of random projects will each year be selected for internal control.

If it is assessed in this process that parts of the chip quantity are not SBP-compliant, it will not be sold with SBP-Claim.

**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:**

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 as specified 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.**

**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.**

**Mitigation measure:**

Alstrup Skovservice is working according to the procedures of the Contractor's Manual, which is laid out to consider the indicators described in the National Risk Assessment. The Contractor's Manual describes how to identify a specific risk and which measures to reduce the risk should be taken before the feedstock can be called SBP compliant. If Alstrup Skovservice is not able to reduce the risk for parts of the biomass, it will not form part of the SBP quantity.

Projects in Alstrup Skovservice are planned, assigned and controlled by Gert Alstrup.

The risk assessment is based on available map material and databases as well as a review of the area before startup. A map and checklist is prepared for each job to ensure that the machine operator is aware of protected or preserved nature/culture. Alstrup Skovservice has implemented the measures to reduced risk from the National Risk Assessment, except from the proposal to share maps with experts or relevant stakeholders.

Primary feedstock from FSC or PEFC certified forests - **Always low risk**

2. Primary feedstock from forests with a green management plan, **incl. key biotopes mapping (low risk) or excl. key biotopes mapping (specified risk)**
3. Primary feedstock from thinnings of conifer stands - **Always low risk**
4. Primary feedstock from thinnings of first generation forest estates - **Always low risk**
5. Primary feedstock from forests without a green management plan or certification (**specified risk**)
6. Primary feedstock from non-forest areas, such as windbreaks and nature projects (**specified risk**)
7. Primary feedstock from final fellings of non-native conifer stands - **Always low risk**
8. Primary feedstock from Wastewood, ex. parks, roads or infrastructure projects - **Always low risk**

The risk assessment is carried out by Gert Alstrup. If external assessment is deemed necessary, a forester/biologist with local knowledge will be used. Gert Alstrup is familiar with identifying key biotopes according to the key biotope type catalogue.

### **Risk handling**

Staff carrying out screenings and planning the jobs are familiar with applicable nature and environment legislation. Alstrup Skovservice plans supply activities to minimise the negative effect on ecosystems, biodiversity and areas worth preserving.

Areas where wood chip is harvested must be examined before startup by a physical review and must be mapped according to the procedure below. All procedures are explained in the Contractors' Manual. A map will be prepared for each wood chip project. If maps have been prepared in connection with certification or a green management plan, these maps must be used in the process in order to ensure HCV areas.

- If the work area is located in a forest, it will be screened according to the checklist in the Contractors' Manual.
- If the job consists of thinning in an afforestation or thinning/clearcut in an even age, even aged conifer stand, screening is done.
- If the work area is located outside a forest, screening may be omitted. Legality must be ensured.
- Each wood chip project is given a unique case number and address which also appear on the job description, weighing forms and basis of settlement. Ensure traceability.
- Each wood chip project has a Checklist with relevant information. Ensure excellent communication between the various parties in the work process and note down all relevant data which the machine operator needs.

To be able to identify HCV areas during work, all machine operators working with wood chip production in the forest have been trained in "Maskinfærdsel på Naturnære arealer" (Machine traffic in nature areas). For all suppliers (forest owners), Alstrup Skovservice enters into an agreement with the forest owner on the task, Alstrup Skovservice is always physically out to inspect project areas. They are responsible for the entire process. I.e. Planning of the task, execution of the task, as well as transport and sale of wood chips. The procedure for purchasing external wood chips will be that Alstrup Skovservice treats the purchase of wood chips from subcontractors as if they were their own projects. Alstrup Skovservice is responsible for mapping, risk assessment, review of the area and risk minimization.

An agreement has been entered into for the supply of biomass from a supplier that is an "Godkendt Biomasseproducent" (Approved Biomass Producer) and to supply biomass in accordance with the Industry Agreement Industry agreement on securing sustainable biomass (wood pellets and wood chips). Alstrup

Skovservice has the right to carry out inspections of the projects.

To ensure that SBP projects are properly categorized and that screening is performed according to the procedures, 10 % of random projects will each year be selected for internal control.

If it is assessed in this process that parts of the chip quantity are not SBP-compliant, it will not be sold with SBP-Claim.

**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:**

Based on the existing protection through the Forest Act and designation of Natura 2000 areas and individual protected areas, it 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 conclude that for these areas the risk is specified based on the same findings as for Indicators 2.1.1 and 2.1.2.**

**Mitigation measure:**

Alstrup Skovservice is working according to the procedures of the Contractor's Manual, which is laid out to consider the indicators described in the National Risk Assessment. The Contractor's Manual describes how to identify a specific risk and which measures to reduce the risk should be taken before the feedstock can be called SBP compliant. If Alstrup Skovservice is not able to reduce the risk for parts of the biomass, it will not form part of the SBP quantity.

Projects in Alstrup Skovservice are planned, assigned and controlled by Gert Alstrup.

The risk assessment is based on available map material and databases as well as a review of the area before startup. A map and checklist is prepared for each job to ensure that the machine operator is aware of protected or preserved nature/culture. Alstrup Skovservice has implemented the measures to reduced risk from the National Risk Assessment, except from the proposal to share maps with experts or relevant stakeholders.

Primary feedstock from FSC or PEFC certified forests - **Always low risk**

2. Primary feedstock from forests with a green management plan, **incl. key biotopes mapping (low risk) or excl. key biotopes mapping (specified risk)**

3. Primary feedstock from thinnings of conifer stands - **Always low risk**

4. Primary feedstock from thinnings of first generation forest estates - **Always low risk**

5. Primary feedstock from forests without a green management plan or certification (**specified risk**)

6. Primary feedstock from non-forest areas, such as windbreaks and nature projekts (**specified risk**)

7. Primary feedstock from final fellings of non-native conifer stands - **Always low risk**

8. Primary feedstock from Wastewood, ex. parks, roads or infrastructure projects - **Always low risk**

The risk assessment is carried out by Gert Alstrup. If external assessment is deemed necessary, a forrester/biologist with local knowledge will be used. Gert Alstrup is familiar with identifying key biotopes according to the key biotope type catalogue.

**Risk handling**

Staff carrying out screenings and planning the jobs are familiar with applicable nature and environment legislation. Alstrup Skovservice plans supply activities to minimise the negative effect on ecosystems, biodiversity and areas worth preserving.

Areas where wood chip is harvested must be examined before startup by a physical review and must be mapped according to the procedure below. All procedures are explained in the Contractors' Manual. A map will be prepared for each wood chip project. If maps have been prepared in connection with certification or a green management plan, these maps must be used in the process in order to ensure HCV

areas.

- If the work area is located in a forest, it will be screened according to the checklist in the Contractors' Manual.
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- Each wood chip project is given a unique case number and address which also appear on the job description, weighing forms and basis of settlement. Ensure traceability.
- Each wood chip project has a Checklist with relevant information. Ensure excellent communication between the various parties in the work process and note down all relevant data which the machine operator needs.

To be able to identify HCV areas during work, all machine operators working with wood chip production in the forest have been trained in "Maskinfærdsel på Naturnære arealer" (Machine traffic in nature areas). For all suppliers (forest owners), Alstrup Skovservice enters into an agreement with the forest owner on the task, Alstrup Skovservice is always physically out to inspect project areas. They are responsible for the entire process. I.e. Planning of the task, execution of the task, as well as transport and sale of wood chips. The procedure for purchasing external wood chips will be that Alstrup Skovservice treats the purchase of wood chips from subcontractors as if they were their own projects. Alstrup Skovservice is responsible for mapping, risk assessment, review of the area and risk minimization.

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To ensure that SBP projects are properly categorized and that screening is performed according to the procedures, 10 % of random projects will each year be selected for internal control.

If it is assessed in this process that parts of the chip quantity are not SBP-compliant, it will not be sold with SBP-Claim.

**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:**

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.**

**Mitigation measure:**

Alstrup Skovservice is working according to the procedures of the Contractor's Manual, which is laid out to consider the indicators described in the National Risk Assessment. The Contractor's Manual describes how to identify a specific risk and which measures to reduce the risk should be taken before the feedstock can be called SBP compliant. If Alstrup Skovservice is not able to reduce the risk for parts of the biomass, it will not form part of the SBP quantity.

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3. Primary feedstock from thinnings of conifer stands - **Always low risk**
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7. Primary feedstock from final fellings of non-native conifer stands - **Always low risk**
8. Primary feedstock from Wastewood, ex. parks, roads or infrastructure projects - **Always low risk**

The risk assessment is carried out by Gert Alstrup. If external assessment is deemed necessary, a forester/biologist with local knowledge will be used. Gert Alstrup is familiar with identifying key biotopes according to the key biotope type catalogue.

### **Risk handling**

Staff carrying out screenings and planning the jobs are familiar with applicable nature and environment legislation. Alstrup Skovservice plans supply activities to minimise the negative effect on ecosystems, biodiversity and areas worth preserving.

Areas where wood chip is harvested must be examined before startup by a physical review and must be mapped according to the procedure below. All procedures are explained in the Contractors' Manual. A map will be prepared for each wood chip project. If maps have been prepared in connection with certification or a green management plan, these maps must be used in the process in order to ensure HCV areas.

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To ensure that SBP projects are properly categorized and that screening is performed according to the procedures, 10 % of random projects will each year be selected for internal control.

If it is assessed in this process that parts of the chip quantity are not SBP-compliant, it will not be sold with SBP-Claim.

## 7.2 Monitoring and outcomes

For the implemented mitigating measures and control of subcontractors with the described and incorporated procedures with screening and visual visits of all supply areas, a low risk has been achieved for the indicators with specified risk:

- 2.1.1 Forests with high conservation value, HNV have been mapped and identified
- 2.1.2 Potential threats to forests and other areas of high conservation value from afforestation activities have been identified and addressed
- 2.2.3 Protection of key biotops and habitats
- 2.2.4 Ensuring biodiversity

Which is thus reduced to pose low risk.

Internal control of SBP categorizations found no discrepancies.

Control with subsuppliers of wood chips:

In 2023, we have not purchased biomass from subcontractors who have prepared the screening themselves. We have screened the small quantities that have been bought in from other manufacturers and prepared work maps ourselves.

in cases where a subcontractor has the qualifications to prepare a screening, then Alstrup Skovservice ApS will twice a year select samples in the submitted tasks from subcontractors and physically check projects, and assess whether the classification is correct.

The number of samples will be the square root of the number of tasks purchased in the previous period multiplied by 0.6 as a coefficient ( $y = 0.6\sqrt{x}$ ) rounded up to an integer. Upon inspection, no discrepancies were found.

New Danish regulations based on the EU RED II directive. Has been adapted In order to meet the new requirements. Registration of biomass categories/types and reporting in compliance with the new legislation. two random projects are reviewed each month. One error has been found, it has been fixed. See schedule for "control of projects".

## 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

Claus Clemmensen, B. SC Forstry

### 9.2 Public or additional reviews

N/A



## 10 Approval of report

Approval of Supply Base Report by senior management			
Report Prepared by:	Jette F. Nielsen	Owner	04 Mar 2024
	Name	Title	Date
Report Prepared by:	Gert Alstrup	Owner	04 Mar 2024
	Name	Title	Date
<p>The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.</p>			
Report approved by:	Jette F. Nielsen	Owner	05 Mar 2024
	Name	Title	Date
Report approved by:	Gert Alstrup	Owner	05 Mar 2024
	Name	Title	Date

## Annex 1: Detailed findings for Supply Base Evaluation indicators

N/A

Annex 2: Detailed findings for REDII  
Section 1. RED II Supply Base Evaluation

**Country:Denmark**

**(i) The legality of harvesting operations**

<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	Our management system is described in the "Entrepreneur Handbook". The handbook describes how we prepare a risk assessment and how we manage risk in connection with the production of biomass. In our risk analysis, applicable legislation on the individual project areas is reviewed and ownership can be checked in our mappingsystem.

**(ii) Forest regeneration of harvested areas**

<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>Areas with forest, protected by the Forest Act:            Forest areas with "Fredskovspligt" according to the Forest Act obliges the land owner to replant the forest. It can be done by planting or natural regeneration.</p> <p>Areas with forest, <b>not</b> protected by the Forest Act:            In connection with clarecuts on forest areas not covered by the Forest Act, a binding agreement is signed by the landowner. The Agreement states that the landowner is obliged to re-establish the forest within 10 years. Either by planting or natural regeneration.</p>

**(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands and peatlands, are protected unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes**

<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	The procedure is described in the "Entrepreneur handbook". Before we start working at a new task, areas protected according to international and national legislation are mapped. In cases where work is to be done in protected areas, relevant authorities are involved (kommunen or Naturstryelsen)

**(iv) That harvesting is carried out considering the maintenance of soil quality and biodiversity with the aim of minimising negative impacts**

<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>The procedure is described in the "Entrepreneur handbook"</p> <p>Soil: Work in the forest is carried out when the soil is serviceable. Suitable machines are used with ground pressure adapted to the task. Possibly in combination with fixed tracks. If significant damage occurs, the work is stopped and the owner is contacted.</p> <p>Birds: Consideration is given to breeding birds in the period 1/3 to 31/7 and special consideration to golden eagles, ospreys, barn owls, larks, great horned owls and sea eagles.</p> <p>Dead wood In all tasks, the machine operator is aware of preserving as much dead wood as possible in dialogue with the individual owner. Dead and dying wood can be advantageously left in connection with key elements in the forest, e.g. waterholes or forest edges.</p>
<b>(v) That harvesting maintains or improves the long-term production capacity of the forest.</b>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	<p>The forest area in Denmark is growing, cf. <a href="https://ign.ku.dk/samarbejde-med-ign/forskningsbaseret-raadgivning/skovovervaagning/danmarks-skovstatistik/">https://ign.ku.dk/samarbejde-med-ign/forskningsbaseret-raadgivning/skovovervaagning/danmarks-skovstatistik/</a></p> <p>But, often in small forest areas, where there is no significant difference in the age of the trees, the production capacity will be greatly reduced in connection with logging. The same applies if the forest is affected by disease or beetle attacks. (cf. ii above, we have a system that ensures that areas with forest is regenerated)</p>
<b>LULUCF criteria 29(7)</b>	
<b>Type of Risk Assessment used</b>	<input type="checkbox"/> Level A – proof at national or sub-national level <input type="checkbox"/> Level B – management system at forest sourcing area level
<b>Level A risk assessment description</b>	N/A
<b>Level B management system at the level of the forest sourcing area</b>	Denmark has committed itself to the Paris Agreement



## Section 2. RED II detailed findings for secondary and tertiary feedstock

### 10.1 Verification and monitoring of suppliers

N/A

### 10.2 Feedstock inspection and classification upon receipt

N/A

### 10.3 Supplier audit for secondary and tertiary feedstock

N/A