Compliance with the SBP Framework: Public Summary Report

Control Union Certifications BV Evaluation of Douro Biofuels, S.A.

Main (Initial) Audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the CB Public Summary Report Template Version 2.1 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

For further information on the SBP Framework and to view the full set of documentation see **www.sbp-cert.org**

Document history

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1 Overview

Certification Body (CB) Name:	Control Union Certifications BV
Primary CB contact for SBP:	Lukasz Dabrowski
Primary CB contact email:	ldabrowski@controlunion.com
Audit team leader:	Henrique Silva
Audit team members:	-
Name of the Company:	Douro Biofuels, S.A.
Company legal address:	Rua Sargento Gil Benido, s/n, 4440-113 Valongo, Portugal
Company contact for SBP:	João Baltazar
Company contact email:	jp.baltazar@dourobiofuels.com
Company website:	
Date of installation:	20 Feb 2026
SBP Certificate Code:	SBP-11-40
Date of certificate issue:	25 Mar 2026
Date of certificate expiry:	24 Mar 2031
Audit closing meeting date:	20 Feb 2026
Audit cycle:	Main (Initial) Audit

2 Audit conclusions

2.1 Certification decision

Based on the auditor's recommendation and the Certification Body's technical review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Bruna Scarparo
Date of decision:	25 Mar 2026
Other comments:	N/A

2.2 Open non-conformities and observations

2.2 Closed non-conformities

2.3 Actions taken by Organisation Prior to Report Finalisation

N/A

2.4 Notes for the next Audit

N/A

3 Scope of the audit and SBP certificate

Scope item	Check all that apply to the Certificate scope
Primary activity	Biomass Producer
Secondary activity	Trader
Approved Standards	SBP Standard 1: Feedstock Compliance v2.0; SBP Standard 2: Feedstock Verification v2.0; SBP Standard 4: Chain of Custody v2.0; SBP Standard 5: Collection and Communication of Data v2.0; Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1; Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413
Product Group IDs	☒ Forest feedstock (1A) ☐ Trees outside forest (TOF) - Urban and landscape feedstock (2A) ☐ Trees outside forest (TOF) - Agricultural land feedstock (3A) ☒ Processing residues feedstock (4A) ☐ Post-consumer feedstock (5A) ☐ Other (please specify)
SBP Feedstock types	☒ SBP Compliant; ☒ SBP Controlled
Includes Supply Base Evaluation (SBE)	Yes
Includes EU RED Scheme	Yes
Includes EU RED Supply Base Evaluation (SBE)	Yes
Products	WB 1.1 Wood pellets
Feedstock origin (countries):	Portugal, Spain
SBP-endorsed Regional Risk Assessments used: **Public link:** https://sbp-cert.org/documents/standards-documents/risk-assessments/	Not applicable
Chain of custody system	☐ Physical separation ☒ Mass balance
Outsourcing	No
Changes in the scope	N/A (Initial audit)

3.1 Description of the company

Guidance: Please describe the type, structure and operations of the company including its role in the supply chain, its inputs and outputs as they related to SBP Standards.

Douro Biofuels, S.A. is a recently established Portuguese company based in Lisbon that operates in the biomass and biofuels sector. Its corporate purpose includes the production, processing, trading, and commercialization of biomass products such as wood pellets, wood chips, and other agro-forestry residues, as well as the development of bioenergy solutions and the potential production of biofuels like biomethane, ethanol, or biodiesel. The company may also engage in timber trading, energy generation from biomass, and international supply of solid biomass fuels. Given its recent creation in 2025, publicly available operational data is still limited, suggesting it is likely in a startup or project-development phase. From a certification and compliance perspective—relevant to your work with SBP and similar audit frameworks—it would typically need to ensure traceability, sustainability verification, and quality certification if it intends to supply biomass to European utilities or industrial energy clients.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
Douro Biofuels, S.A.	Rua Sargento Gil Benido s/n, Campo	Pellet Mill	☒
Porto de Leixões	Avenida da Liberdade, 150, 4450-718 Leça da Palmeira	Loading vessels	☐

3.3 Detailed description of the Chain of Custody system and Product Groups

Guidance: Please describe the operation of the CoC system including details of the mass balance management and a list of established Product Groups.

The Organisation holds valid FSC Chain of Custody certificate. Valid COC system description and other documents exist. Critical control points of the CoC systems were evaluated also during SBP audit. The Organisation has implemented CoC credit system which is used for materials received as FSC certified and FSC Controlled wood, and feedstock verified according to the Organisation's own Controlled wood and risk assessment verification system, covering Portugal and Spain. Feedstock whose origin cannot be verified as per the established Due Diligence system, will be considered as Non-Controlled and will not be included in the production of certified products nor supplied as SBP

4 Specific objective of the audit

The specific objective of this evaluation was to confirm that the organization's process is compliant with RED III requirements.
In February 2026, it was confirmed that the Biomass Producer’s management system is capable of ensuring that all requirements of the specified SBP Standards are implemented across the entire scope of certification. The scope of this evaluation also covered the Supply Base Evaluation and the mitigation measures described herein.

The scope of the evaluation covered:
SBP S1: Feedstock Compliance Standard V2.0 SBP S2: Feedstock Verification V2.0
SBP S4: Chain of Custody V2.0
SBP S5: Collection and Communication of Data V2.0
SBP S5E: collection and Communication of Energy and Carbon data V2.1
RED III directive requirements

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	**Auditors**	**Auditor hours**
1. Preparation	Henrique Silva	4.0
2. On-site (excl. travel time)	Henrique Silva	32.0
3. Report writing	Henrique Silva	6.0

5.2 Auditor team qualification

Auditor qualification		
Auditor name	**Role**	**Qualification**
Henrique Silva	Lead Audtor	FSC, PEFC,SBP,SURE,GGL,ENPLus and DINPlus lead auditor

5.3 Description of evaluation activities

This initial audit was conducted on February, 2026. The audit was conducted on the basis of meeting/interviews with relevant people of the certificate holder, relevant documents and records, and other best available information. The audit consisted of an opening meeting, during which the scope was confirmed. The auditor also explained the methods to be employed during the audit. After this introduction, all relevant Bridging requirements of the SBP scheme for meeting REDIII were verified on compliance through the use of a report template and checklists.
During the audit 4 out 16 FMU's were visited, but there were no WaR suppliers visited since there are no supplies from this raw material at the moment. (SR(16)*0.8 is 3.2)

Interviews described on the checklist

The audit was completed by filling in the audit report and discussing the audit results. Critical Control points were evaluated and found to be sufficiently managed and a closing meeting was performed.

5.4 List of forest management units and feedstock suppliers visited

☐ N/A – No forest sites or suppliers visited during this evaluation

Site name

COMBATENTES
Site location
São Félix da Marinha
Site description
Clear cut from Eucalyptus globulus, Acacia melanoxylon
Rationale and focus of visit
Verify the evaluation from the site
Description of audit activity
During the audit it was verified the evaluation report an related to the site condicions, inpect legal documents

Site name
Varge
Site location
União das freguesias de Ovar, São João, Arada e São Vicente de Pereira Jusã
Site description
Clear cut from Eucalyptus globulus, Pinus pinaster
Rationale and focus of visit
Verify the evaluation from the site
Description of audit activity
During the audit it was verified the evaluation report an related to the site condicions, inpect legal documents

Site name
601-370-1_Foz de Donim
Site location
União das freguesias de Canelas e Espiunca
Site description
Clear cut from Eucalyptus globulus
Rationale and focus of visit
Verify the evaluation from the site
Description of audit activity
During the audit it was verified the evaluation report an related to the site condicions, inpect legal documents

Site name
601-370-1_Foz de Donim
Site location
União das freguesias de Canelas e Espiunca

Site description
Final cut from Eucaliptus with operations onsite
Rationale and focus of visit
The focus of the visit was to verify the labor condicions form this sub-supplier
Description of audit activity
During the visit the two opertors onsite were interviewed, machinery inspected, PPE's and safety equipements controled. The operations were compliant with god practices in the forest.

5.5 Describe audit sampling methodology used

During the audit 4 out 16 FMU's were visited (SR(16)*0.8=3.2), but there were no WaR suppliers visited since there are no supplies from this raw material at the moment.

5.6 CB stakeholder engagement

☐ N/A – Certification Body stakeholder consultation not applicable for this evaluation

Guidance: Please specify the number and types of stakeholders engaged, method of engagement and its outcomes.

The Supply Base Report is sent to the relevant(s) e-mail contact (80) of the entities identified in the stakeholder's list of Douro Biofuels from 17 DEC 2025 to 15 JAN 2026.
Stakeholders contacted for engagement include economic, environmental and social interests:

- Forest owners;
- Forest contractors, including loggers;
- Forest industries;
- Representatives of forest workers and forest industries;
- Government agencies and municipalities;
- NGO's;
- Labour unions;
- Representatives of local communities;
- Representatives of recreational interests;
- Forest certifications representatives;
- National and regional forest entities;

Research universities and institutions

5.7 Stakeholder feedback and response

☐ N/A – Certification Body stakeholder consultation not applicable for this evaluation

None received

5.8 Main strengths and weaknesses of the management system and operations

The audit of Organization demonstrated a good level of compliance with the required criteria of Standard 1, 2, 4 and 5. There was reasonable evidence provided to indicate compliance for the requirements of RED III where Non-Conformities were not detected. The existence of FSC Chain of Custody system in combination with the SBP are considered a strength with respect to Douro Biofuels overall conformity with the relevant SBP standards. An

integration of a consultant is also an important advance.

5.9 Summary of evaluation activities for robustness of the Supply Base Evaluation

☐ N/A – Standard 1 not in the scope of the evaluation

All the relevant requirements could be verified onsite. As an initial audit audit it was verified that Douro embarked on the development of a detailed Supply Base Evaluation which includes a clear description of their Supply Base Area. The geographical scope of the SBE is Continental Portugal, Galicia and Castilla y Leon. The SBE was developed in joint efforts between internal personnel and a qualified consultant, using credible data sources. Douro management and monitoring systems are designed to ensure compliance with applicable laws and regulations. Risk was designated low for all core Indicators, with the exception of 09 Indicators which were designated as specified risk for Portugal and 04 for Spain. Douro has developed additional controls and mitigation measures to manage these risks. After the risk assessment was completed, mitigation measures were proposed and consulted with stakeholders. The stakeholder consultation process involved consultations to key stakeholders with regard to information on SBP certification, SBP risk assessment and supply base report, by communicating this via electronic email. Douro has implemented the mitigation measures for the specified risk indicators as initially proposed. The risk mitigation measures have been designed and implemented planned in cooperation with acknowledged experts and external consultants in relevant fields.

5.10 Summary of evaluation activities for Processing residues and/or Post-consumer feedstock requirements per Standard 2 and EU RED

The organization devoleped a strong control for Processing residues internal audits, during the audit it was not possible to vsisit suppliers because there was no supplying for WaR.

5.11 Summary of evaluation activities for chain of custody system per Standard 4

Douro Biofuels is certified against FSC COC and its complementary CW standard. There is commitment signed and avaiable.

5.12 Summary of evaluation activities for collection and communication of data per Standard 5

The SBP Audit Report (SAR) on Energy and Carbon Data for Wood Pellets, version 3.0, has been completed in accordance with the standard. All data provided by the BP was verified for consistency and accuracy.
The BP has appropriate procedures in place for this process and has supplied and communicated actual data, as well as provided a good overview of the requirements for data collection.

5.13 Summary of audit findings for competency of involved personnel

Internal staff members and one external consultant are involved in the SBP system management and implementation. All interviewed responsible staff demonstrated awareness of their responsibilities within SBP system. The external Consultant who is contracted for forest matters, which includes sourcing the forest based material and field visits and reports for SBP Std.#1. All involved personnel, including responsible staff at suppliers and sub-suppliers have demonstrated good knowledge in relevant fields (recognition and identification of HCVF, familiarity with health and safety requirements, timber origin verification) during the site visits. Relevant certificates and diplomas were presented during the assessment and scope change audits. Qualification requirements for personnel involved in the SBE system are provided in documented procedures of the BP. In overall, auditors evaluate the competency of main responsible staff to be sufficient for implementing the SBP system with both primary and secondary material sourced within the SBE. This has been based on interviews, review of qualification documents, training records and set of procedures and documents that were composed for the SBP system as well as field observations during the assessment and audits.

5.14 Summary of audit findings for GHG methodology per Standard 6 (if applicable)

☒ N/A – Standard 6 not in the scope

6 Detailed evaluation of BP's Supply Base Evaluation (if applicable)

☐ N/A – Supply Base Evaluation not in the scope of the evaluation

6.1 Overview of BP's risk assessments and mitigation measures including EU RED scope

Control Union Certifications assessed the risk for each indicator in accordance with the guidance set out in Section 11 of SBP Framework Standard 2: *Verification of SBP-compliant Feedstock*. The risk assessment was carried out with the support of a technical expert and considered both the likelihood of non-compliance occurring and the potential impact of such non-compliance. The evaluation was conducted at both regional level and individual forest level. As a result, the assessment identified nine specified risk indicators in Portugal and four in the regions of Spain covered by the supply base, which require the implementation of specific control systems or mitigation measures.

6.2 CB evaluation of specified risk indicators and mitigation measures

Country
Portugal
Area/Sub-Scope
Continental
Indicator
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
Specified risk description
Consideringtheabsenceofcompletelegislativerequirementsregulatingtheconversionofforests toplantationandthestatisticsaboutthe areaconvertedafter2008.,itisconsideredaspecifiedrisk thatfeedstockissourcedfromforestsconvertedtoproductionplantationforestornon-forestlands afterJanuary2008.
Detailed description of a mitigation measure
•Consultationof historical informationsourcesandinformationfromstakeholders •Analysisofowner'sinformationregardingthepastandfuturearea'scoveringanduse. •Procedurestoconductmonitoringfieldauditstoverifyif feedstockisor isnotsourced fromforestsconvertedtoproductionplantationforestornon-forest landsafterJanuary 2008. •Disqualifymaterialcomingfromareaswherenatural forestwasconvertedinto Eucalyptusorotherplantationfrom2008,ortobeconverted withEucalyptusorother plantation,ortransformedintopasture,agricultureorothernon-forestuse; •PromotionofGoodForestPractices •Monitoringplan
Detailed description of CB evaluation of mitigation measure and its conclusions
Themitigationmeasuresareefectiveandobservedduringtheinspection

Country
Portugal

Area/Sub-Scope
Continental
Indicator
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Specified risk description
Biodiversity is included on fundamental environmental law on its article 10th (Law 19/2014 14/04) and is fully covered by biodiversity and nature conservation legal framework. In Continental Portugal the protected areas and Natura 2000 sites covers 2.017.803 ha meaning 20.47% of the territory. As on Convention on Biological Diversity: 'Portugal's National Biodiversity Strategic Action Plan NBSAP was based on the following ten guiding principles: an overall higher level of protection; the sustainable use of biological resources; prevention; precaution; recuperation; responsibility; integration; participation; international cooperation and decentralization. The NBSAP then lists 10 fundamental strategies that form the basis of their action plan, which include: to promote scientific research and knowledge of local patrimony; to enhance the National Protected Areas Network; to promote the valorisation of the protected areas, and ensure the conservation of all social, cultural and natural components; ensure conservation and valorisation of areas within the Natura 2000 Network; implement, across the entire national territory, actions specific to the conservation and management of species and habitats of particular interest; integrate conservation and sustainable use principles into national and regional policies and laws; reinforce cooperation between all levels of administration; promote education and formation in conservation fields; ensure public education, awareness and sensitization; and strengthen international cooperation.(...) About 3,600 species of plants occur in Portugal. There are 69 taxa of terrestrial mammals, a total of 313 bird species, of which around 35% are threatened in some ways, and 17 amphibian and 34 reptile species that occur in Portugal. Some of the main threats to the biological diversity of Portugal include: alteration or destruction of habitats; pollution; overexploitation; invasive alien species; urbanization and fires. It is considered that a significant part of biodiversity is covered for which low risk was not reached in this risk assessment. All classified habitats, besides priority ones included on HCV, must be included in this indicator.
Detailed description of a mitigation measure
1) The organization prepares (publicly available) data on biodiversity researches and programs, red lists of Portugal, CITES, etc. This information is given to all feedstock suppliers. 2) Feedstock suppliers are trained to recognise the protected biodiversity and how to conserve them. These species are often related (it can be indicator species) to key ecosystems which need conserved (previous indicator). 3) The harvesting teams inspect visually the plot, make photos and report on the results. Endangered flora and fauna are indicated on the harvesting maps. The organization completes its 'Environmental Impact Assessment' (EIA). 4)Best practises are used (internal document IT-04). Best practices include measures to conserve and increase biodiversity (for example, standing dead wood, prescribed burning and other disturbances improving the conditions for endangered species flora and fauna). 5) The organization monitors the harvesting operations of its feedstock suppliers and checks the EIA of its suppliers.
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on

sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Portugal
Area/Sub-Scope
Continental
Indicator
2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d. Highly biodiverse grasslands.
Specified risk description
Most environmental legal requirements relating to forestry planning activities are included in Portugal's forestry legislation. In the administrative process of forest planning or forestation projects, the competent entities are centrally consulted by the national forest authority (ICNF). Management Plans including Forest Intervention Zone (ZIF), Community Use Area Plan (PUB) and Intervention Special Plan (PEIF) have been in place since 2000, and (to 2013) cover about 44% of Portuguese forest area. In private areas, forest plans are mandatory for all forest areas greater than a certain area (from 25 ha to 100ha, depending on the region); however lack of this requirement has not resulted in any known penalties. In public areas, forest plans are obligatory for all areas (state forest, municipalities, etc.); however numbers from 2012 indicate that only 43% of these forests have the PGF. As of 2015, it is an objective of the forest authority ICNF that 100% of its areas should have a PGF by 2017 (for all public areas). In communitarian forests plans are obligatory for all areas however 2015 data show that Forest Plans (PUB) are in place in only 60% of cases. Forest Management Plans should include identification of most part of potential impacts and measures to minimize them. However, it is not a specific tool used to monitor environmental impacts, on FMU Management Plans.Instead there are the Regional Forest Plan covering all country which contains the most part of recommendations and tools to address forest impacts. Regional Forest Management Plans (PROF's) include monitoring specifications related to sustainability of forest resources, detailing all biotic and abiotic factors but also soils, and a list of potential impacts. Best practices are included for each forest management program. First generation PROF's were approved ten years ago, and they are all in a revision, being expected to be approved soon. No clear cuts are allowed, sustainable and best practices are mandatory by the authorities, specially under Portuguese Natura 2000 law. The national nature conservation system is based on legal protection regimes (such as The National network of protected areas, Natura 2000 network, etc.), which limits the activities allowed in these areas. There is also an inspection authority, SEPNA, and a strong system of protection (effective protected áreas and legislation) in place. Even so The organization is concerned and the Manager of the Certificate or the Responsible of Reception carries out audits to suppliers (Beginning of the year or part 1 of the process) by documenting them in the 'CW Vendor Audit' report cdr04. The procedures are in document 'The organization DDS and FSC manual' (please see attached). The supplier agrees to alert The organization, if it changes the source of the supply área. As a result, this control has made it possible to have a better understanding of all the traceability of raw material and this is reflected in the fact that there are no problems with suppliers, raw materials or land disputes. Larger scale activities are obliged to address a legal impact assessment and monitoring processes so an Environmental Impact Assessments must be done to conversions above 50 ha or reforestations with fast growth species above 350 ha. These figures are lower when they occur inside Sensitive Areas (Protected, Classified and Monumental Areas), where it is obligatory to have this approved EIA if conversion to non-forest uses involves an area greater than 10 ha or forestation/ reforestation is taking place with fast-growing forest species covering over 70 ha. In case no forest plan is available (no PROF, PGF ZIF, PUB, SNAC, as well as no PEFC or FSC certification) an additional

assessment of environmental impacts is made and recorded before harvest. The organization always completes an 'Environmental Impact Assessment'. Therefor it is concluded that the impact assessment is covered by various tools and it is considered as specified risk.

Detailed description of a mitigation measure

The organization's Enviromental Impact Assessment Manifest
Regional Forest Plan (PROF) The organization DDS
FSC manual
CW Vendor Audit' report cdr04 Records of The organization field inspections SNAC framework
Environmental Impact Assessment

Detailed description of CB evaluation of mitigation measure and its conclusions

During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country

Portugal

Area/Sub-Scope

Continental

Indicator

2.2.2 Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.

Specified risk description

Key ecosystems and habitats with high concentration values are identified as classified or protected areas at national and/or EU level (Natura 2000 sites) as described in indicators of high values. National summary of the implementation of the Habitats Directive (2007-2012) provides relevant information about the conservation status and evolution of key habitats, including the source of threats and pressures for each designated habitat. The complete data set necessary to produce the summary is available on Central Data Repository (EIONET) and can be consulted using this link: Report on the implementation of the Habitats Directive (2007-2012) The Fifth National Report to CBD shows that Portugal is acting to reduce threats to biodiversity and meet the Aichi Biodiversity Targets by 2020 – the country is implementing several initiatives directed to each Target, which are described in detail in this report, however, several issues are identified that need to be addressed over the next years, such as improvements on the: i) implementation of strategic guidelines namely the National Strategy for Nature and Biodiversity Conservation; ii) integration of biodiversity issues in the different sectors and policies; iii)classification, inventory, ecological characterization and monitoring of biodiversity; iv) engagement of the private sector, v) biodiversity valuation process and its integration on public accounting, vi) management efficiency of the conservation status of threatened species (including ex situ), vii) control and elimination of exotic invasive species, viii) habitat restoration, ix) enforcement actions related to crimes against biodiversity and x) promotion of active participation of civil society in biodiversity issues By analysing this report, it can be seen that Portugal has taken several measures to achieve CBD's goals, concluding from the need for a greater integration of biodiversity issues in different sectors and policies and the greater involvement of the private sector in this area. Reference should be made to the development of the Biodiversity Information and Monitoring of northern Portugal (SIMBioN), developed by the ICNB, IP,

and by CIBIO, which had, among its objectives, to provide the ICNB, IP with a tool to support biodiversity management and contribute to scientific knowledge and public dissemination of biodiversity. Conclusion:The overall conservation status trends of habitats, as well as the number of attributes from which the conservation trends are unknown imposes the risk to be assessed as specified for priority habitats and ecosystems as per Natura 2000 network listing.

Detailed description of a mitigation measure

Before harvesting operations commence the plot is evaluated on this point and records are kept. Best forestry practises are applied. Maps can be obtained from 'Reserva Ecológica Nacional' (REN). The organization completes an 'Environmental Impact Assessment' (EIA) from all feedstock suppliers. The The organization' EIA addresses the specified risk on soil degradation: best practices have to be applied (The organization' Internal Instruction on Best Management Practices IT-04).

- Low intensity of forestry, selective cuttings and small clear cuts of maximally 5 ha were needed considering the soil and groundwater level.
- Regeneration focusses on tree species that maintain or improve soil quality
- Leave nutrients in the forests, mainly the green fraction of forest residues (on the other hand other forest residues need to be cleared to prevent forest fires.

Do not operate near-water areas (called the National Ecological Reserve).
For example, on dry locations (elevated grounds or on slopes) selective cuttings are required, because the ground gets less direct impact of the sun and the forest and (natural) regeneration can maintain soil quality.
On other locations (small) clear cuts can sometimes have the advantage that several kinds of broadleaved trees regenerate naturally, what improves soil quality. After clear cuts, the groundwater level can rise, what sometimes is an advantage.

Detailed description of CB evaluation of mitigation measure and its conclusions

During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country

Portugal

Area/Sub-Scope

Continental

Indicator

2.2.3 Soil quality in the Supply Base shall be maintained or enhanced

Specified risk description

Soil quality in Portugal has not a positive evolution since historic times as the major part of Mediterranean region. Following FAO. 2013. State of Mediterranean Forests. Rome. http://www.fao.org/docrep/017/i3226e/i3226e.pdf '(…)45 percent of European soil is degraded and depleted of organic matter and noted that the problem was particularly pressing in the Mediterranean region. Degradation can involve erosion, settling, the loss of organic matter, salinization, landslides, the loss of soil biodiversity, acidification, desertification and subsidence. All these problems could be exacerbated by climate change. (…) Figure 1.24 shows that there were

considerable differences between countries, with losses of arable land greater than 25 percent in Croatia, Malta, Portugal and The former Yugoslav Republic of Macedonia. From 1992 to 2009. At national level, following Desertification Convention 5.1 Desertification Susceptibility (https://dre.pt/application/file/65985917): for Portugal, it can be concluded that, in the last half a century, the area of susceptibility to desertification clearly expanded in the mainland territory particularly in the period 1970-2000, and then for the 1980-2010 series, and is even more relevant as expansion for the 2000-2010 series, which corresponds to the most recent period analysed, with annual droughts particularly severe. It is known, therefore, that aridity, then susceptibility to desertification, affected, in the last three decades (1980-2010), 58% of the territory of the Continent, when in the series of 1960-1990 this affectation was of 36%, being included in this context mainly the areas of the South and the Interior Center and North. In the climatic series of the last decade, about 63% of the mainland territory is classified as areas susceptible to desertification. FAO- Land Degradation Index — LDI, developed for mainland Portugal (2000-2010) states that the national territory has 32.6% degraded lands and 60.3% are included in the fair to good condition. Lands and soils that accumulate biomass over time are about 67,8% but static trends were observed in 30,8% of territory and 1,5% have a regression on land quality. Later on, Forest Services used aridity index to produce the susceptible map of desertification, indicating priority areas for EU forest grants for forestation projects. The results of this FAO study, among others, where used to create National Program Against Desertification, which is adopted, among others by Regional Forest Plans, defining forest procedures for spaces for carbon sink and other for energetic use of biomass. The private and public Forest Management Plans should adopt these designations and procedures on their implemented management practices and procedures. Specifically on forest soils it is recognized the problem of nutrient and carbon exportation due to harvesting and residues removal in a significant part of the country which is affected by erosion and desertification problems Although there is a broad consensus over soils fragility in much of the country, policies that contribute decisively to the conservation and improvement of soil quality in Portugal have not been implemented on the last decades. These implemented forest policies have not prevented the installation and exploitation of commercial timber forest stands including plantations of intensive softwood and hardwood plantations in sensitive soils with erosion risks contributing to expand the susceptible areas to desertification. The legal and regulatory framework includes restrictions and safeguards for soil use and mobilization operations with particular emphasis on sensitive, steep and near-water areas (called the National Ecological Reserve). However, as shown by above cited studies and data, reality at ground level does not reflect the application of these restrictions. Also forest residues removal from the field is regulated in Portugal, so loggers and owners have some legal obligations, related with both fire and phytosanitary policies. These obligations are depending on species, areas, seasons and regions. Process of forest residue treatment is commonly included on Best Practices but also on wood supply contracts, and forest land leasing. According to the available information, it is considered that on small size forest properties risk is low, as small scale also reduces the threats and risks involved with soil operations. Therefore, and using a precautionary approach, it is considereed specified risk for soil quality of sourcing biomass feedstock on: • forest lands located on desertification susceptible area according to Forest Services (ICNF) cartography and • with size above minimum size required for Forest Management Plan.

Detailed description of a mitigation measure

Before harvesting operations commence the plot is evaluated on this point and records are kept. Best forestry practises are applied. Maps can be obtained from ‘Reserva Ecológica Nacional’ (REN). The organization
completes an ‘Environmental Impact Assessment’ (EIA). The The organization’ EIA addresses the specified risk on soil degradation: best practices have to be applied (The organization’ Internal Instruction on Best Management Practices IT-04).

- Low intensity of forestry, selective cuttings and small clear cuts of maximally 5 ha were needed considering the soil and groundwater level.

Regeneration focusses on tree species that maintain or improve soil quality

- Leave nutrients in the forests, mainly the green fraction of forest residues (on the

other hand other forest residues need to be cleared to prevent forest fires. Do not operate near-water areas (called the National Ecological Reserve). For example, on dry locations (elevated grounds or on slopes) selective cuttings are required, because the ground gets less direct impact of the sun and the forest and (natural) regeneration can maintain soil quality. On other locations (small) clear cuts can sometimes have the advantage that several kinds of broadleaved trees regenerate naturally, what improves soil quality. After clear cuts, the groundwater level can rise, what sometimes is an advantage.
The organization checks the EIA of its suppliers. Poor soil quality can lead to erosion and other problems.

Detailed description of CB evaluation of mitigation measure and its conclusions

During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country

Portugal

Area/Sub-Scope

Continental

Indicator

2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.

Specified risk description

The organization considers the landscape where the harvest operations are executed, including hill slopes and streams that can overflood and demands the same from its feedstock suppliers. Clear cutting (of several ha) is avoided in areas where all conditions are at high risk for soil erosion. In these cases, is followed the ICNF Handbook for forest best practices: 'In the areas surrounding the water lines the risk of erosion is often very high, since these are areas of concentration of rainwater runoff. In these bands (with a minimum width of 10 meters for each side, as stated in the legal definitions and conditions of legal limits (Decree-Law no. 468/71, of 5 November) a strict prevention of erosion phenomena shall be performed, and it is therefore essential to adopt measures to protect it, such as maintaining all or a significant part of the natural vegetation and not inflict harm to the soil.' These best practises are required to comply with the requirements of SBE program. Water legal framework includes water law and national and hydrographical basin plans, being Portuguese Environment Agency the national authority. Other authorities like SEPNA (National Republican Guard) and Nature Guards and Vigilantes, also have competencies of water resources inspection actions. The organization has never been penalized by any of these entities because it never operates on water lines. National Ecological Reservation is a territory classification of sensitive areas for 'ecosystem services' where water issues are addressed, and some restrictions are in place to prevent negative impacts in slopes, valleys and other sensible situations. Every forest projects and plans must comply with this regulation, and they should be in place, for example in projected soil preparation techniques. The risk is applied to all private, communitarian, and public forest areas which are not managed by ICNF. ICNF Handbook for forest best practices defines: 'In the areas surrounding the water lines the risk of erosion is often very high, since these are areas of concentration of rainwater runoff. In these bands (with a minimum width of 10 meters for each side, as stated in the legal definitions and conditions of legal limits (Decree-Law no. 468/71, of 5 November) a strict prevention of erosion phenomena shall be performed, and it is therefore

essential to adopt measures to protect it, such as maintaining all or a significant part of the spontaneous vegetation and not perform any mobilization of the soil.' Usually prevented by legal and regulatory framework, however in Portuguese implemented legislation there is not a clear and effective legal tool over all territory, being exceptions the Northern regions, where 10 hectares is defined as the maximum clearcuttings area as defined on Regional Forest Plans. Also some Municipalities may have municipal regulations about clearcutting fellings. So it is considered there are specified risks that feedstock is sourced from forests when clear cuttings are done over a specific size area. This specific area is defined regionally by each Regional Forest Plan (PROF), as the maximum clearcutting area or the size of even aged monoespecific forest stand. However, our suppliers never intervene in water zones. This is confirmed by our forestry specialist who is constantly on the ground to accompany our suppliers. This is considered a specific risk.

Detailed description of a mitigation measure

The organization studies data (from publicly available information, researches and programs) for its harvesting teams on ground water, surface water and steams on identifying and addressing potential threats, HCV 1 – Species diversity). This information is given to all feedstock suppliers.
2) Feedstock suppliers are trained to not contaminate ground water and to plan forest management operations that protect the soil, forest and surroundings from surface water.
3) The harvesting teams inspect visually the plot and the hill slopes and streams in the surroundings and report on the results. The organization completes its 'Environmental Impact Assessment' (EIA).
4) Best practises are used (internal document IT-04). Best practices include forest management measures that protect the plot against too high or low ground water levels, and erosion (surface water moving to quick or too slow). Related to a too quick runoff of surface water, streams in the surroundings are considered. The landscape where the harvest operations are executed is considered, including hill slopes and streams that can overflood. In areas vulnerable to water damage, the maximal contiguous clear cut area is 5 ha.
5) The organization monitors the harvesting operations of its feedstock suppliers and checks the submitted EIAs. These best practises are required to comply with the SBE program requirements.
The best practices as stated in point 4, and the Environmental Impact Assessment in point 3, follow the 'ICNF Handbook for forest best practices': 'In areas surrounding the water lines the risk of erosion is often very high, since these are areas of concentration of rainwater runoff. In these bands (with a minimum width of 10 meters for each side, as stated in the legal definitions and conditions of legal limits (Decree-Law no. 468/71, of 5 November) a strict prevention of erosion phenomena shall be performed, and it is therefore essential to adopt measures to protect it, such as maintaining all or a significant part of the natural vegetation and not inflict harm to the soil.

Detailed description of CB evaluation of mitigation measure and its conclusions

During the audit it was observed that the suppliers have experience forest engineers leading the company, the certificate holder have also two consultants experts on sustainability and forestry operations. The risk evaluation and mitigation measures are compliant and effective with the operations.

Country
Portugal
Area/Sub-Scope
Continental
Indicator
4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Specified risk description
The organization has a rigorous control system and adequate procedures on the health and safety of forest workers. The organization (contractually) demands the same from its feedstock suppliers and checks the health safety of harvesting personnel during its monitoring inspections. Portugal has ratified convention ILO 184 on 2012, about agriculture health and safety in agriculture which includes forestry activities with exception of industrial forest harvesting. ILO forestry H & S code includes some of forestry activities on 'high risk operations' such as climbing above 3m, but in Portuguese legislation any forestry activity is included on legal list of 'High Risk Activity'. Work legislation aims to create a safe and healthy work environment at all times in accordance with society's technical and social development. Historically, a risk under this category has been present based on a low level of compliance with the requirements for accreditation and/or professional training. In recent years, many obligations have changed and private entities have started to develop courses for some activities of forest workers (for example for chainsaw, machinery or phytopharmaceuticals users). Legal authority for work health and safety is ACT (Working Conditions Authority), who as an inspective role on the ground. ACT promoted the development of the Strategic Action Plan for Agriculture, livestock and Forestry sectors from 2012 to 2015 producing the assessment report for this initiative (see report). From the execution of this plan 6 informative leaflets were produced as well as 8 instruments for the application of the respective law framework (checklists). The plan involved the participation of several social partners as well as public partners which can be consulted in the report. An estimate of 9000 employers and employees were reached throughout the development of this plan as well as 560 associative managers and technicians. The plan also comprised an inspective component materialized on 1700 inspections over 3 years reaching to 10 000 workers. The organization have a specialist in hygiene and safety at work. This specialist has a responsibility to evaluate all situations that compromise workers. Also all employees of the company, including the forestry specialist, have annual internal and external training (operations by certified companies) on workers' safety and health. The personal protective equipment is also delivered to all employees and is sensitive. It also has internal and external formations in forestry machinery and works in height. The The organization uses high quality equipment for better management and safety of the work. International Trade Union Confederation (IUTC) ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. Portugal has a rating of 3, from 1 to 5+, in the ITUC Global Rights Index 2014. This score is given for countries where: (There are) 'Regular violation of rights. The government and/or companies are regularly interfering in collective labour rights. There are deficiencies in laws and/or certain practices which make frequent violations possible.'
Detailed description of a mitigation measure
The organization has a rigorous control system and adequate procedures on the health and safety of fforest workers. The organization (contractually) demands the same from its feedstock suppliers and checks the health safety of harvesting personnel during its monitoring inspections. During the feedstock supplier's office inspections of The organization are checked: the training records, workforce, and the hiring of specialists in forest security. Protective equipment (according to the applicable law) and knowledge of personnel is inspected during site visits.

The organization' monitoring procedure includes 2 checklists:
a) Feedstock suppliers (CL 02 - Check List Documental verification Suppliers);
b) Harvest operations (CL 01 - Check List Forest Exploration Suppliers). The organization ensures:
• Accredited professional courses (chainsaws, machinery operator, phytopharmaceuticals applicator) card and/or specific certificates of training sessions.
• Records of H& S procedures and Personal Protection Equipment distribution by the organization.
Record of machinery safety tools and equipments on original documental register.

Detailed description of CB evaluation of mitigation measure and its conclusions

During the audit it was observed that the suppliers have experiment forest engineers leading the company, the certificate holder have also two consultants experts on sustainability and forestry operations. The risk evaluation and mitigation measures are compliant and effective with the operations.

Country

Spain

Area/Sub-Scope

Galicia and Castilla y Leon

Indicator

2.2.3 Soil quality in the Supply Base shall be maintained or enhanced

Specified risk description

The European Court of Auditors (ECA) research indicates that up to 44% of Spain runs a great risk of soil erosion. According to JRC Science for Policy report "Condition of agricultural soil: Factsheet on soil erosion", 2017, Soil degradation by water erosion is particularly significant in Spain (3,7 t/ha per year) in years 2000-2012. This indicator is classified as Specified risk of erosion, desertification and loss of nutrients in the forests.

Detailed description of a mitigation measure

Desk assessment on soil quality and train/inform suppliers of the best forestry practices applicable to soil protection, namely:
- Where needed, considering the soil and groundwater level, only selective cuttings and small clear cuts of maximally 5 ha shall be planned.
- Leave nutrients in the forests, mainly the green fraction of forest residues less or equal to 3 cm (on the other hand other forest residues need to be cleared to prevent forest fires.
Do not operate near-water areas.

Detailed description of CB evaluation of mitigation measure and its conclusions

During the audit it was observed that the suppliers have experient forest engeniers leading the company, the certificate holder have also two consultants experts on sustainability and forestry opertations. The risk evaluation and mitigation measures are comaplaiant and efective with the opertaions.

Country
Spain
Area/Sub-Scope
Galicia and Castilla y Leon
Indicator
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Specified risk description
In Spain, one of the measures established is the respect for the banks and watercourses, as well as the impossibility of stump removal, in order to ensure the grip of the land and possible effects on the water. However, for forest origin areas of the biomass with slope(s) over 30% it is considered that there the risk of this indicator may be Specified.
Detailed description of a mitigation measure
As a general mitigation measure, The organization will only accept biomass from felling areas with a slope of more than 30%, if such forest areas have approved Management Plans by the competent authorities. In any case, for biomass from areas with a slope of over 30% The organization will identify the elements to be protected with respect to the effect on water so these can be protected during harvest operations. These measures shall be duly documented. Additionally, The organization trains/inform suppliers of the best forestry practices applicable, which are identified in the best practices manual. This manual sets out basic protection measures such as respect for watercourses and riparian vegetation, respect for wetlands and small water springs and, in the case of the existence of water resources, physical and chemical alterations to water and watercourses are to be avoided, respecting areas of public hydraulic domain and avoiding the dragging of materials due to erosive processes.
Detailed description of CB evaluation of mitigation measure and its conclusions
During the audit it was observed that the suppliers have experiment forest engineers leading the company, the certificate holder have also two consultants experts on sustainability and forestry operations. The risk evaluation and mitigation measures are compliant and effective with the operations.

Country
Spain
Area/Sub-Scope
Galicia and Castilla y Leon
Indicator
2.2.11 The impacts of natural processes such as fires, pests and diseases shall be managed.
Specified risk description
Forest fires: Although forest operations such as thinning and clearing have a positive impact on forest fire prevention by reducing the density of biomass in the forest cover, and forest operations

itself are not considered a relevant cause of forest fires, the risk is identified as specified in private forest areas and as low in public forest areas. Pest and diseases: Low risk is identified for the management of pests and diseases.

Detailed description of a mitigation measure

- Desk assessment looking for if the forest area complies with the established obligations in each Autonomous Region regarding the prevention and defense against forest fires (Prevention Plan, approved Management Project/Management Plan)
- Best forest practices.

Compliance with the law (drawing up a prevention plan, etc.) is ensured before forest operations start by the harvesting teams /company.

Detailed description of CB evaluation of mitigation measure and its conclusions

Visual inspection of the harvesting operations, aiming to check if the harvest teams have all the required means available, specifically in high fire risk periods, and if legal established restrictions are considered.
If the harvested areas do not have a recognized by authorities' prevention and defense against fires plan, before harvesting operations start, The organization does not accept the respective material as SBP-compliant feedstock.
If the harvesting teams do not comply with the legal established obligations and cannot implement forest fire fighting measures accordingly, The organization does not accept the respective material as SBP-compliant feedstock.

Country

Spain

Area/Sub-Scope

Galicia and Castilla y Leon

Indicator

4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.

Specified risk description

This indicator is identified as Specified risk due to the inherent risk of jobs in the forests.

Detailed description of a mitigation measure

The organization has a control system and adequate procedures related to health and safety of forest workers and demands the same from its feedstock suppliers. The organization suppliers are required to be qualified and approved before performing any operations to The organization.
The organization suppliers' qualification process includes checking of:

- Work accidents Insurance and health aptitude forms
- Social Security responsibilities
- Workers training on health and safety
- Health and safety procedures
- Records of Personal Protection Equipment (PPE's) delivered to workers

Records of machinery safety inspections.

Detailed description of CB evaluation of mitigation measure and its conclusions

During the audit it was observed that the suppliers have experiment forest engineers leading the company, the certificate holder have also two consultants experts on sustainability and forestry operations. The risk evaluation and mitigation measures are compliant and effective with the operations.

Country

Portugal

Area/Sub-Scope

Continental

Indicator

2.2.11 The impacts of natural processes such as fires, pests and diseases shall be managed.

Specified risk description

Pests and diseases The Operational Program of Forest Health defines a complete action framework comprising implementation assessment reports (diagnosis, identification, control, monitoring, sampling, etc.), informative leaflets (“FitoNotícias”), best practices handbook aimed at several steps of forest- based operations and a wide diversity of documents and actions aiming to inform and train forest owners and operators on legislation, best practices, precautionary measures among others. Programs aimed at monitoring forest health and at monitoring and controlling quarantine and non-quarantine organisms, pests and diseases are in place, annual reports addressing the implementation of the action plans set out to tackle threats from pest and diseases are made available on ICNF webpage https://www.icnf.pt/florestas/fitossanidade The most important biotic threat for tree species relevant for timber feedstock is the Nemátodo da Madeira do Pinheiro (NMP) [Pine Tree Nematode]. Other relevant are: - Cancro-resinoso-do-pinheiro “Fusarium circinatum” [Pine Resin Cancer] - Gorgulho-do-eucalipto [Gonipterus platensis] affecting eucalyptus. Comprehensive action plans aimed to control and eradicate the Pine TreeNematode in Portugal are in place and pursue the following objectives: - Identify affected forest areas (Intervention Zones [Zonas de Intervenção]). - Avoid the dissemination of the disease to the Buffer Zone [Zona Tampão], a strip of 20 km along the border with Spain. - Avoid the spreading of the disease from affected to non-affected areas. Execution reports of the action plan for the control of NMP, between 2008 and 2017, show that the disease is geographically confined to the Intervention Zones (ZI) and the number of vector insects detected with NMP is stable over the years. Simultaneously, no positive samples were identified at the buffer zone (ZT). Coniferous wood timber must be accompanied by a specific harvesting manifest [NMP manifest] which is issued through an online ICNF platform, https://fogos.icnf.pt/manifesto/manifestoadd.asp, where the involved operators are required to be registered. The NMP manifest contains all the relevant information about the harvested timber, location of the harvesting operation, registered operator which performed the harvest, landowner, destination, among other data. Data from surveillance operations, comprising the inspection of more than 22000 wood transport vehicles, show a residual number of contraventions raised by the lack of the NMP manifest – 30 in 2022. These data are presented in the 2022 Activity Report of the Republican National Guard [GNR] Reports from the execution of the action plan to monitor and control the spreading of Fusarium circinatum are available comprising the period between 2012 and 2018. Data show a stable trend of infected production sites and number of plants destroyed. Only 3 forest stands were declared as infected over the assessment period. The “Sistema de Gestão de Informação de Fitossanidade Florestal” (FITO) is an online platform where all inspectors responsible for the application of the several action plans related to forest health can add relevant information and findings from their work.Considering that effective management activities are put in place regarding the control of forest pests and

diseases comprising annual reports and surveillance of forest operators on the compliance with legal requirements, the risk is considered low for management of pests and diseases. Rural Wild Fires In recent years, mainland Portugal was affected by the most intense and destructive fires recorded, such as the 2003 fire season where 300 thousand ha of forest were burnt, 18 people died, approximately 85 were displaced, and hundreds had to be evacuated from their homes; the 2017 fire season that burned more than 500 thousand ha, and resulted in more than 100 human lives lost; the 2018 southern Portugal wildfire, which destroyed dozens of homes and killed thousands of animals. Consequences of these fires were wide social, environmental, and economic losses, with the 2017 fire season having a consequent economic cost greater than one thousand million of Euros, the 2018 fire season leaving more than 100 homeless, and the 2022 fire season having a strong impact on biodiversity, natural heritage, tourism, and local producers of Serra da Estrela. Indeed, these recent occurrences point to a “new normal” where frequent extreme 14 fire risk conditions and consequent events take part of everyday life in the warmer months, typically between June and September. This is more worrisome when taking projections of climate change until the end of the 21st century. A recent study showed that summer values of fire risk tend to substantially increase in the future, with a likely stretching of the danger period. The northwestern region of Iberia, including the north of Portugal and the northwestern-to-central Spain were the regions where larger increases in fire risk in the future were found. These findings are especially noteworthy since these are the regions with more fire-prone vegetation. In Portugal, rural wildfires are addressed in several planning and strategic documents as the National Strategy for Forest, and the National Plan for the Reduction of Fire Occurrences. Relevant information about rural wildfires can be found in the dedicated page of the ICNF website, where the following is available: - Mapping of combustible management lanes, high risk areas, areas affected by fires, etc. - Good practices, reports and technical orientations - Studies and Planning - Statistics; and, - Legal framework. Establishes measures and actions to take place within the framework of the Forest Safeguard System Against Wildfires, such as: - A 10 meters buffer lane must be kept between trees or railways, roads, electric lines in high or very high voltage, transport lines of gas or oil products. - 7 meters buffer lane between trees and for medium voltage electric distribution lines, from SIRESP’s infrastructures. - 3 meters buffer lane between trees and for low voltage electric distribution lines. - 100 meters buffer lane around camping and caravan parks, hotel establishments, in business location areas, in industrial establishments, in establishments covered by Decree-Law no.150/2015, fuel supply, logistics platforms, production and storage facilities for electrical energy or gas and in sanitary landfills. In the surroundings of built-up areas, when bordering forest territories (may be reduced to 10 m distance based up on risk assessment). - 50 meters buffer lane between trees and other habitational or economical activities’ edifications non mentioned on obliged to the 100 m buffer lane. Instruments to support the implementation of actions to recover the effects of large forest fires are applied every year in order to manage the risks created by the occurrence of forest fires: https://www.icnf.pt/florestas/gfr There is a Program of Forest Rangers in place to promote several activities related to the prevention of fires, operators and public awareness among others. To assess the effectiveness of the activities performed during the year, several activity reports are available with the listing of operations, statistics analysis and other relevant information. The Protection of forest against forest fires is implemented and applied by every municipality and the Municipal plans approved and in force are available for consultation: Consulta PMDFCI (icnf.pt) For wild fires, since 2017, the most tragic year, the awareness of the population has raised, and some mechanisms and obligations were implemented that help to prevent and to facilitate the wildfire intervention. Around buildings there must be a clean distance of 50 meters, forests must be cleaned annually to difficult the fire progression, first intervention teams were created in small villages to enable first intervention until firefighters ‘teams arrive. National media campaigns take place during all the fire season discouraging dangerous behaviours. Outside the fire season, when the fire risk improves is possible to find warnings in radio or television regarding the fire risk. There were improvements in the firefighter’s equipment and the fire season was enlarged (this fire season determines the firefighting equipment availability and teams’ readiness), there are geographical information systems dedicated to fire’s events. The less taken care forests are not the ones that are being commercially explored. Unfortunately, due to the expected climate evolution in Portugal in the Mediterranean area severe wildfires are expected, although biomass production provides a positive effect in defending the forest.

Detailed description of a mitigation measure
- Desk assessment looking for if the forest area complies with the established obligations in each Autonomous Region regarding the prevention and defense against forest fires (Prevention Plan, approved Management Project/Management Plan) - Best forest practices. Compliance with the law (drawing up a prevention plan, etc.) is ensured before forest operations start by the harvesting teams /company.
Detailed description of CB evaluation of mitigation measure and its conclusions
Visual inspection of the harvesting operations, aiming to check if the harvest teams have all the required means available, specifically in high fire risk periods, and if legal established restrictions are considered. If the harvested areas do not have a recognized by authorities' prevention and defense against fires plan, before harvesting operations start, The organization does not accept the respective material as SBP-compliant feedstock. If the harvesting teams do not comply with the legal established obligations and cannot implement forest fire fighting measures accordingly, The organization does not accept the respective material as SBP-compliant feedstock.

Country
Portugal
Area/Sub-Scope
Continental
Indicator
3.3.1 Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.
Specified risk description
The experience shows that market itself regulates the proper use of wood. There is no commercial logic on using for processing materials which may be traded with better profit. Wood is a commodity, and the EU laws walk the path to value its resources. At the same time, wood presents an opportunity as carbon sink (at the forest and outside of it). Each tree may be entirely used and, as a valuable resource, its use must be optimized considering that long lived products have priority. Despite the above, the wood industry has cycles of lower production with consequent lower demand for supply, and within the forest-based industry there are various sub sectors that develop independently from each other. In those cycles the forest keeps growing, the forest industry still operates, and the fire menace exists. These discrepancies don't vary only in time but also in space, even in a small country such as Portugal. There is a growing recognition of the need to align bioenergy policies with the cascading principle of biomass use, aiming to ensure fair access to the biomass feedstock market. In line with the cascading principle, woody biomass should be used according to its highest economic and environmental added value in the following order of priorities: - wood-based products - extending their life service - re-use - recycling - bioenergy; and, - disposal. Where no other use for woody biomass is economically viable or environmentally appropriate, energy recovery helps to reduce energy generation from non-renewable sources. Member States should be allowed to derogate from the cascading principle in duly justified circumstances, for example where required for security of energy supply purposes, such as in the case of particularly severe cold conditions, and where there are no industries or

processing facilities that could make a higher added value use of certain feedstock types within a geographical perimeter. In such cases, transport beyond that perimeter for the purpose of such a use might not be justified from an economic or environmental point of view. As said, there are conditions that may justify a deviation on the cascade use, but this should be properly justified. Considering the above and the natural market volatility, this indicator risk is considered specified. A closer assessment will provide more awareness of this indicator.

Detailed description of a mitigation measure

As part of the mitigation measures required under clause 3.1.1 of SBP Standard 1, Douro Biofuels, S.A. conducts site visits to the forest intervention area during or after harvesting operations. These inspections verify that the raw material supplied to the company cannot reasonably be used in higher-value economic activities or other wood-processing industries and that it corresponds to the feedstock type agreed with Douro Biofuels. This includes confirming that the material consists, for example, of burned wood from forest fires or wood rejected by other wood-industry sectors due to not meeting minimum requirements for dimensions, shape, or quality. These checks ensure that only compliant, low-grade or residual biomass feedstock is sourced in accordance with SBP requirements and documented within the company's due diligence and traceability system.

Detailed description of CB evaluation of mitigation measure and its conclusions

During the audit it was observed that in the yard there were no feedstock not compliant with cascading principles.