

Supply Base Report: Comsa Renovables SAU

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Completed in accordance with the Supply Base Report Template Version 1.3

*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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Contents

1	Overview.....	1
2	Description of the Supply Base	3
2.1	General description	3
2.2	Actions taken to promote certification amongst feedstock supplier	6
2.3	Final harvest sampling programme	6
2.4	Quantification of the Supply Base	6
3	Requirement for a Supply Base Evaluation.....	8
4	Supply Base Evaluation.....	9
4.1	Scope	9
4.2	Justification.....	9
4.3	Results of Risk Assessment.....	9
4.4	Results of Supplier Verification Programme	9
4.5	Conclusion.....	9
5	Supply Base Evaluation Process.....	10
6	Stakeholder Consultation.....	11
6.1	Response to stakeholder comments	11
7	Overview of Initial Assessment of Risk	12
8	Supplier Verification Programme	13
8.1	Description of the Supplier Verification Programme	13
8.2	Site visits	13
8.3	Conclusions from the Supplier Verification Programme.....	13
9	Mitigation Measures	14
9.1	Mitigation measures	14
9.2	Monitoring and outcomes	14
10	Detailed Findings for Indicators	15
11	Review of Report	16
11.1	Peer review.....	16
11.2	Public or additional reviews.....	16
12	Approval of Report.....	17
13	Updates	18

13.1 Significant changes in the Supply Base 18

13.2 Effectiveness of previous mitigation measures 18

13.3 New risk ratings and mitigation measures..... 18

13.4 Actual figures for feedstock over the previous 12 months 18

13.5 Projected figures for feedstock over the next 12 months 18

1 Overview

On the first page include the following information:

Name of the Company: Comsa Renovables SAU
c/Viriato 47, 2a Planta 08014 Barcelona
Barcelona, Spain

Company contact for SBP: Isart Gaspa Company
c/Viriato 47, 2a Planta 08014 Barcelona
Barcelona, Spain
M +34 638 26 16 77
Email: igaspa@comsa.com

Company website: www.comsa.com

Geographic position: The Supply Base, as defined by Comsa Renovables, covers the following Spanish Autonomous Communities: Catalunya and Aragon.

CB name and Contact: NEPCon

Ondrej Tarabus
M +34 605 63 83 83
Email: otarabus@nepcon.org

Date report finalised: 17.02.2021

Close of last CB audit: 19.02.2021

SBP Standard(s) used: Standard 2, Standard 4 and Standard 5

SBP Endorsed Regional Risk Assessment: N/A

Weblink to SBE on Company website: N/A

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations

Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
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☐	☒	☐	☐	☐
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2 Description of the Supply Base

2.1 General description

Comsa Renovables SAU focuses its activity on the generation of electrical energy from renewable sources and on the development of services in order to provide efficient solutions that include the use of renewable resources and, therefore, have a direct impact on the reduction of emission of effect gases greenhouse.

Specifically, power generation comes from solar parks, windmills, thermo-solar plants and biomass. Likewise, the business manages and develops renewable energy projects, offers operation and maintenance services for facilities and biomass supply.

Likewise, COMSA Renovables offers forest biomass supply services for its energy recovery, an area in which it positions itself as the main operator in Catalonia with more than 100,000 Tn / year.

The biomassa supply is the main object of the PEFC Chain of Custody System. Buying chipped or chipped wood, PEFC certified for the sale of PEFC certified forest biomass with the application of subcontractors for chipping in the forest itself and transporting from the forest to the client.

The company holds a valid PEFC Chain of Custody System with number: PEFC / 14-31-00318-BVC . The source region is Catalunya but also Aragon.

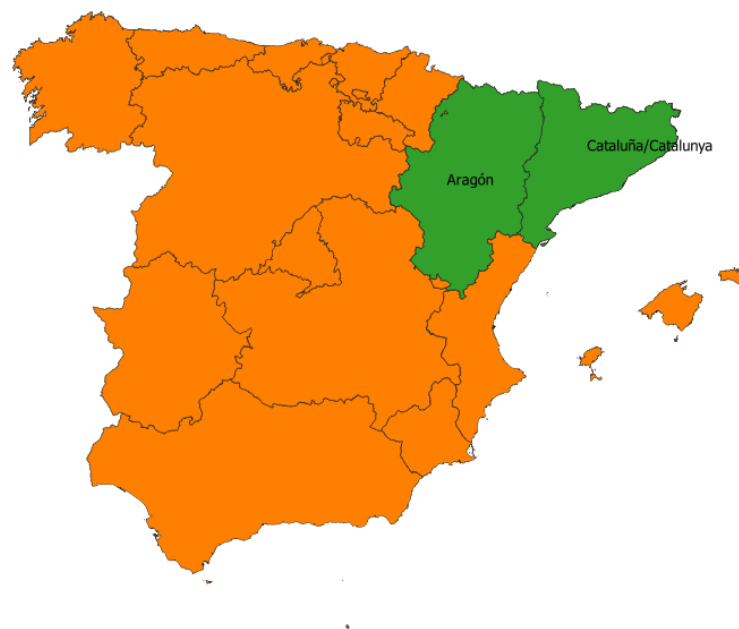


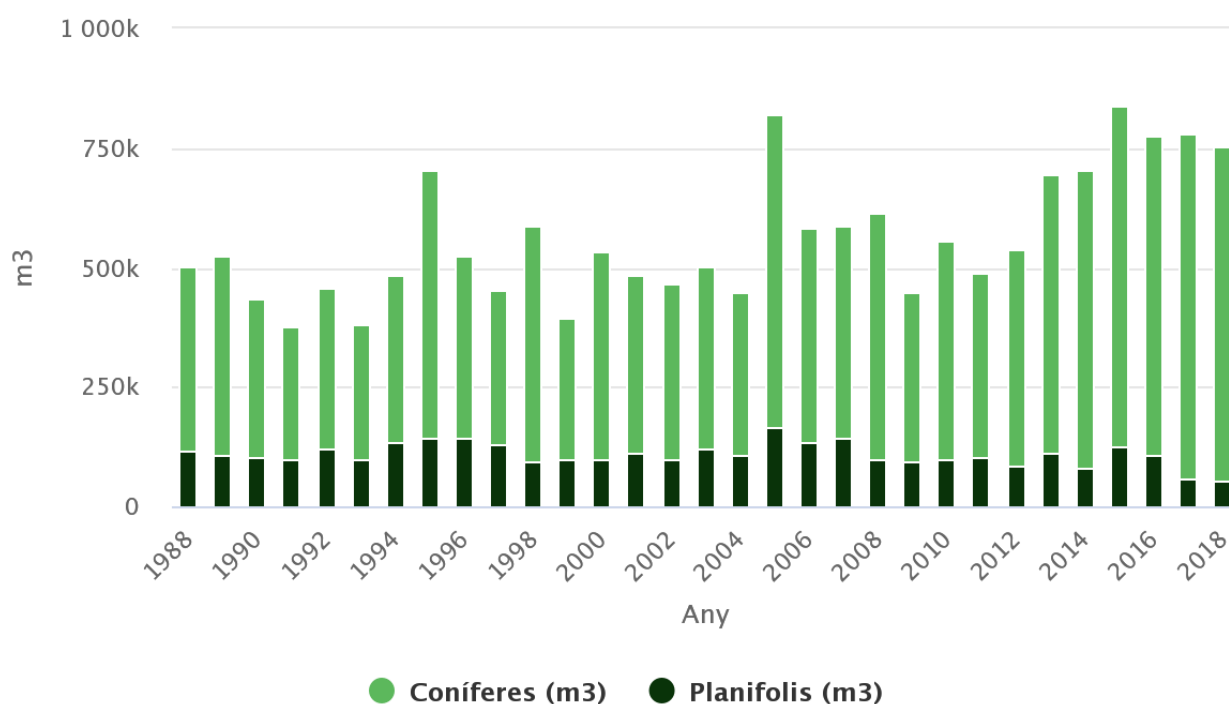
Figura 1 Supply Base COMSA RENOVABLES

The principal species are Aleppo pine, Quercus sp, Stone pine, Maritime pine, Scots pine and Black pine. Catalunya and Aragon together holds a 67,76% of Privat forests.

In Catalunya since the last 25 years, where data is recorded, there had been an increase of volume of biomass due to the population had abandoned the villages to go to the cities to work.

Inventari	Volum with cork	Increase	Period (years)	Annual Increase (m3)
FN3 (2000-2001)	118.117.666	32,27%	10	3.811.226
IFN4 (2013-2016)	151.492.338	22,03%	15	2.224.978

Table: 1: Source: <http://www.observatoriforestal.cat/resum-del-sector/>



Font: DGEFGM

Figura 2: Source: <http://www.observatoriforestal.cat/resum-del-sector/>

Only the 33% of the total amount growing each year is harvested in the Area of Catalunya. These data s very low compared with the average in EU which is 69%.

The biggest part of the wood harvested is conifer species with 700.000t which represents a 71% of the total cuttings.

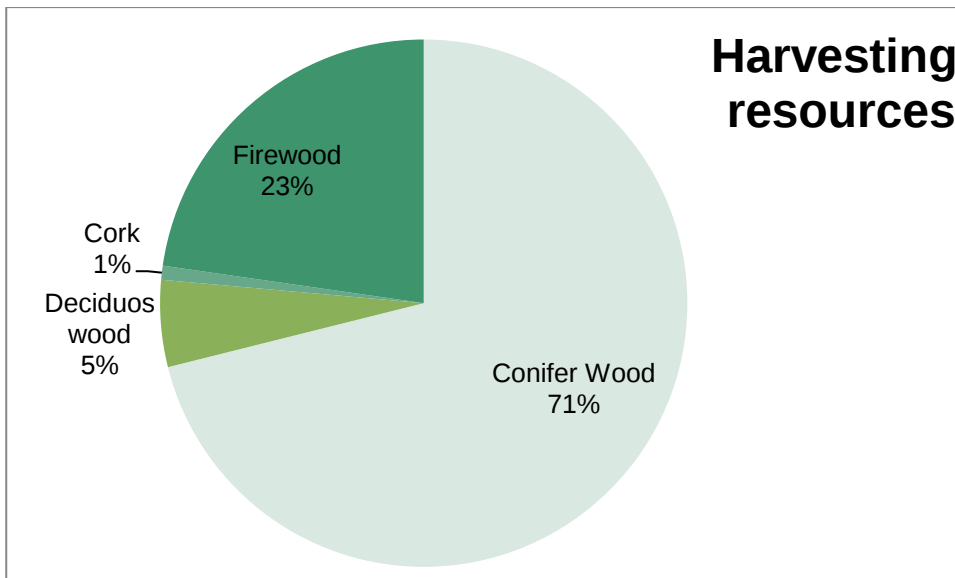


Figura 3: Data Source: <http://cpf.gencat.cat/ca/transparencia/estadistiques/gestio-forestal/>

The last year with data is 2018 and the 29% of the resources is to produce woodchips. These data has to consider that the primary use of the wood is for the timber industry, who uses the resource to produce their own products. Part of the total amount of biomass, as woodchips and pelet, comes from subresidues of these industries.

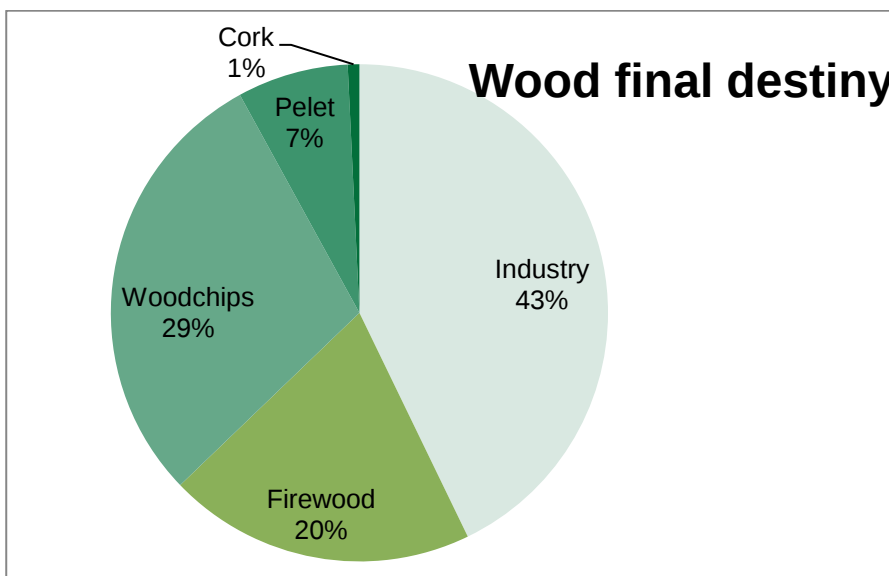


Figura 4: Data Source <http://www.observatoriforestal.cat/produccio-de-biomassa/>

Comsa Renovables does not harvest directly the forest, instead of these have different suppliers with base in Catalunya and Aragon from which they buy the whole tree feedstocks or the woodchips directly. There are 9 suppliers allowed to sell biomass to Comsa Renovables.

Comsa Renovables visit the forest and the feedstock from their suppliers to ensure that the quality is optimum before to chip. Once the quality of the feedstock is guaranteed, the trees are chipped directly on the trucks to ensure that there is no contamination of soil or stones. Finally the trucks go to the Comsa clients directly.

Most of the Comsa suppliers have the PEFC Certificate which allows at Comsa sell biomass 100% certificated with the credit system.

Comsa Renovables does not trade any tree species included in CITES list. Neither Pine or other species such as Populus, Quercus or Fagus are within the list of species, Appendices I, Appendices II and Appendices III (<http://checklist.cites.org/#!/en>). Trees species included in IUCN are considered Least Concern in Spain (<https://www.iucnredlist.org/search/list?landRegions=ES&searchType=species>).

2.2 Actions taken to promote certification amongst feedstock supplier

Comsa Renovables uses their PEFC Chain of Custody System to trade with biomass. The aim of the company is to have enough biomass Certificated to sell biomass 100% PEFC Certificated at the costumers who demand the certifications. Therefore the suppliers are interested to certificate their forest to deal with Comsa.

2.3 Final harvest sampling programme

Comsa Renvoables ask for the Permissions given by the Competent authority at their supliers, the Public Administration is who allow to harvest the forest. In the permission are given the total amount of cubic metric and the type of fellings.

The characteristics of the forests in the area only allow that the major part of the operations are thinnings. This particularity is due to the forest are growing in spaces before occupied by agriculatural lands, and the forests are growing in lands with small mountains but with big slopes, the Mediterranean climate and the soil resources, don't allow to have big trees with enough quality for the timber industry, and this industry exist for the manufacture of Pallets for the merchaderies transport. So, it is normal that a relevant part of the final destiny of the wood goes for biomass.

As is had showed in the General Description, the average of the timber in the region that are used as a biomass is a 38% if we consider the woodchips plus pelet. Theese percentatge could be considered high, however the extraction of part of biomass from the forest, with sustainable management focus in the reduccion of the forest fire potential and the timber industry, helps at the conservation and the resilience of the forests in the region.

2.4 Quantification of the Supply Base

The main region the Supply Base is Catalonia but also there are some Forests freests in Aragon

Supply Base

a. Total Supply Base area (ha): cumulative area of all forest types within SB

Auntonomous Comunuty	Total (ha)
ARAGÓN	1.577.990,95
CATALUÑA	1.626.212,28

Table: 2 Source: <https://www.mapa.gob.es/>

b. Tenure by type (ha): privately owned/public/community concession

	Public (ha)	Privat (ha)
ARAGÓN	734.609,65	843.381,30
CATALUÑA	298.421,19	1.327.791,09

Table: 3 Source: <https://www.mapa.gob.es/>

c. Forest by type (ha): boreal/temperate/tropical

Auntonomous Comunuty	Coniferous (ha)	Deciduous (ha)	Mixta(ha)	Total (ha)
ARAGÓN	834.575,43	181.621,11	561.794,41	1.577.990,95
CATALUÑA	716.058,26	335.117,17	575.036,85	1.626.212,28

Table: 4 Source: <https://www.mapa.gob.es/>

d. Forest by management type (ha): plantation/managed natural/natural

Auntonomous Comunuty	Plantation	Natural (ha)
ARAGÓN	0	843.381,30
CATALUÑA	11.639,82	1.316.151,48

Table: 5 Source: <https://www.mapa.gob.es/>

e. Certified forest by scheme (ha): (e.g. hectares of FSC or PEFC-certified forest)

Auntonomous Comunuty	PEFC (ha)
ARAGÓN	65.883
CATALUÑA	272.370

Table: 6Source: <http://www.enscat.org/> <https://www.aragon.es/>

Feedstock

f. Total volume of Feedstock: 20.568,02 tones

g. Volume of primary feedstock: 20.568,02 tones

h. List percentage of primary feedstock (g), by the following categories. - percentages may be shown in a banding between XX% to YY% if a compelling justification is provided*. Subdivide by SBP-approved Forest Management Schemes:

- Certified to an SBP-approved Forest Management Scheme: 81,3%
- Not certified to an SBP-approved Forest Management Scheme: 18,7%

i. List all species in primary feedstock, including scientific name

Common name	Scientific name	Percentatge
Aleppo pine	Pinus halepensis	90%
Umbrella pine	Pinus pinea	10%
Black pine	Pinus nigra	
Maritime pine	Pinus pinaster	

j. Volume of primary feedstock from primary forest: 0 tones.

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
☐	x

SBE is not required due to the all the feedstock is included in the PEFC Chain of Custody System

4 Supply Base Evaluation

4.1 Scope

Not applicable

4.2 Justification

Not applicable

4.3 Results of Risk Assessment

Not applicable

4.4 Results of Supplier Verification Programme

Not applicable

4.5 Conclusion

Not applicable

5 Supply Base Evaluation Process

Not applicable

6 Stakeholder Consultation

Not applicable

6.1 Response to stakeholder comments

Not applicable

7 Overview of Initial Assessment of Risk

Not applicable

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

Not applicable

8.2 Site visits

Not applicable

8.3 Conclusions from the Supplier Verification Programme

Not applicable

9 Mitigation Measures

9.1 Mitigation measures

Not applicable

9.2 Monitoring and outcomes

Not applicable

10 Detailed Findings for Indicators

Not applicable

11 Review of Report

11.1 Peer review

The document has been send to Ignacio Lopez, forest engineer working in Boscat SL. A stakeholder from Comsa. Ignacio has said that the 54% of the wood with destiny to biomass it was to high for his perception.

The data was revised and finally the percentatge of woodchips harvested in Catalonia is 29% when all the others uses were taken into account.

11.2 Public or additional reviews

If another type of external review was done prior to finalisation of this report (e.g. publication for comments by stakeholders, NGOs, or other independent third parties), describe the process here.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	<i>Isart Gaspà Company</i>	<i>Forest Engineer</i>	<i>17/02/2021</i>
	Name	Title	Date
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:	<i>Josep Maria Font Fisa</i>	<i>Director Comsa Renovables SAU</i>	<i>17/02/2021</i>
	Name	Title	Date

13 Updates

Note: Updates should be provided in the form of additional pages, either published separately or added to the original public summary report.

13.1 Significant changes in the Supply Base

Not applicable

13.2 Effectiveness of previous mitigation measures

Not applicable

13.3 New risk ratings and mitigation measures

Not applicable

13.4 Actual figures for feedstock over the previous 12 months

20.568,02 tones

13.5 Projected figures for feedstock over the next 12 months

In the year 2020 the estimated production estimated is brand 1) between 0 and 200.000 tones