

Supply Base Report: Grasmo A/S

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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.....	2
2.1	General description.....	2
2.2	Actions taken to promote certification amongst feedstock supplier	12
2.3	Final harvest sampling programme	12
2.4	Flow diagram of feedstock inputs showing feedstock type [optional]	12
2.5	Quantification of the Supply Base.....	13
3	Requirement for a Supply Base Evaluation	14
4	Supply Base Evaluation	15
4.1	Scope.....	15
4.2	Justification	15
4.3	Results of Risk Assessment	15
4.4	Results of Supplier Verification Programme	15
4.5	Conclusion	15
5	Supply Base Evaluation Process	16
6	Stakeholder Consultation	17
6.1	Response to stakeholder comments	17
7	Overview of Initial Assessment of Risk.....	18
8	Supplier Verification Programme.....	19
8.1	Description of the Supplier Verification Programme	19
8.2	Site visits.....	19
8.3	Conclusions from the Supplier Verification Programme	19
9	Mitigation Measures	20
9.1	Mitigation measures.....	20
9.2	Monitoring and outcomes	20
10	Detailed Findings for Indicators	21
11	Review of Report	22
11.1	Peer review.....	22
11.2	Public or additional reviews	22
12	Approval of Report	23

13	Updates	24
13.1	Significant changes in the Supply Base	24
13.2	Effectiveness of previous mitigation measures	24
13.3	New risk ratings and mitigation measures	24
13.4	Actual figures for feedstock over the previous 12 months	24
13.5	Projected figures for feedstock over the next 12 months	24

1 Overview

Producer name:	Grasmo A/S
Producer location:	Sandnesvegen 32, 2235 Matrand, Norway
Geographic position:	60°03'13.2"N;12°07'59.2"E
Primary contact:	Anders Ettestøl Arbaflame AS, Box 2934 Solli, N-0230 Oslo, Norway +47 48171451 anders.ettestol@arbaflame.no
Company website:	www.arbaflame.no (mother company)
Date report finalised:	29/May/2019
Close of last CB audit:	31/May/2019
Name of CB:	Control Union Certifications B.V.
Translations from English:	Yes; Norwegian
SBP Standard(s) used:	Standard 2 version 1.0 Standard 4 version 1.0 Standard 5 version 1.0
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards
SBP Endorsed Regional Risk Assessment:	not applicable
Weblink to SBR on Company website:	www.arbaflame.no/sbp

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
☒	☐	☐	☐	☐

2 Description of the Supply Base

2.1 General description

Grasmo A/S is a pellet plant located in the South-east of Norway. The company was built in 2003 and it is fully owned by Arbaflame A/S.

Grasmo produces steam exploded (dark) wood pellets from woodworking residues of around five sawmills. These residues for pellet production consist of sawdust of Norway spruce (*Picea abies*) and Scots pine (*Pinus sylvestris*). All volumes are procured with an FSC and/or PEFC certification claim.

Of the incoming raw material:

- > 95% is SBP-compliant Secondary Feedstock
- < 5% is SBP-controlled Secondary Feedstock

The supply base is Norway and Sweden (their forest areas and wood lands).

The whole of Norway and Sweden are considered. A general description on forestry management practices in these countries and, for example, the measures taken to conserve biodiversity are given below. In general, these Scandinavian countries are renowned for their developed forestry sector, sustainable forest management, and exemplary socio-economic working conditions.

Regionally, Grasmo is a relatively small processor of wood residues and it is not involved in wood harvesting operations. Its suppliers of wood residues are small and medium-sized sawmills. Irrespectively of the size of the wood harvesting companies in Norway and Sweden, the commercial operations are performed in a similar way.

The innovative steam explosion production process is patented. The process adds more value to the wood residues than the conventional pellet production process. The pellets have a higher Net Caloric Value and can be stored outside (water resistant). This development of this technology is of value to the biomass sector worldwide.

Norway

In total 37% of Norway's land area, or about 122 000 km² is covered by forests or wooded land. Around 50% is considered productive area. Approximately 25 000 people (of a total population of 5 million) are employed in the forest based value chain.

Norway spruce and Scots pine are the most common tree species in Norwegian forests, representing 75% of the total standing stock. The forests cover bio-geographical regions from the nemoral/supratemperate and boreonemoral/hemiboreal regions in the south to the boreal regions in the north. The main forest types used commercially are dominated by spruce, pine, birch, and (marginally) oak.

Almost all Norwegian forests are part of a certification scheme. PEFC certification covers 7 380 750 ha (2017), whereof 6% has a double certification FSC/PEFC (Statement PEFC, 2018).

Annually, Norwegian forests absorb 30.8 million tons of CO₂. This is about 50% of the Norwegian emissions of climate gases.

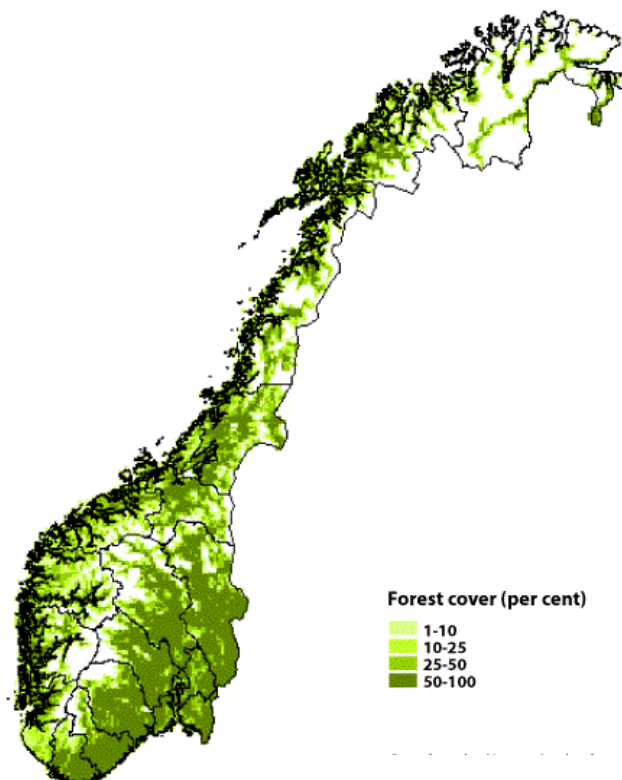


Figure 1: Forest cover in Norway

In 2018, Norway had a Corruption Perception Index (CPI) of 84 and also according to the World Bank Worldwide Governance Indicators (WGI) it has excellent scores on 'Government Effectiveness', 'Rule of Law' and 'Control of Corruption'.

Table 1: The development of standing stock in Norwegian forests (2017)

	Standing stock (2017) 1 000 m ³	Share	Changes in percentages	
			2016 - 2017	2008 - 2017
Growing stock				
Total	964915	100%	1.3%	23.1%
Spruce	424432	44%	1.5%	20.4%
Pine	296255	31%	1.4%	16.4%
Broad-leaved	244228	25%	0.9%	38.1%
Annual increment				
Total	25421	100%	- 1.5%	2.1%
Spruce	13635	54%	- 0.8%	1.1%
Pine	5719	22%	- 3.4%	- 2.4%
Broad-leaved	6068	24%	- 1.3%	9.2%

Source: Statistics Norway

Forest property

Norwegian forestry is closely connected to family farming and cooperatives. About one third of the forest properties is smaller than 10 ha. Individual land holders own 77% of the forests, the state owns 7%, and the remainder is owned by companies, the church, forest-commons and municipalities. 80-85% of the timber for industrial use comes from family owned forests connected to forest owners' cooperatives. The timber cooperatives were formed about a hundred years ago by family forest owners.

There are six regional forest owners' cooperatives in Norway with around 36 000 members. The cooperatives are found throughout the country and are based on democratic principles with boards composed of elected employees and forest owners.

Table 2: Forest properties and productive forest area in Norway (2017)

Property size (ha)	Number of properties	Share	Productive forest area (ha)	Share
2.5 - 9.9	43 571	34.3%	243 197	3.5%
10 - 24.9	33 218	26.2%	543 456	7.8%
25 - 49.9	21 963	17.3%	780 561	11.1%
50 - 99.9	15 499	12.2%	1 084 885	15.5%
100 - 199.9	7 976	6.3%	1 096 645	15.7%
200 - 499.9	3 589	2.8%	1 057 062	15.1%
500 – 1 999.9	988	0.8%	860 863	12.3%
≥ 2 000	234	0.2%	1 335 681	19.1%
Total	127 038	100.0%	7 002 349	100.0%

Source: Statistics Norway

In Norway, each property is registered and filed under a unique number ("gårds- og bruksnummer") with an associated map. Many property borders are also marked in the field, but not systematically. The governments have an accessible public register "Grunnboka" recording all legal rights associated to each property.

The legal rights to the land include logging and grazing rights. These two types of rights can be separate, meaning that persons other than the landowner can have grazing rights. Logging rights always belong to the owner and can be sold, while grazing rights normally cannot. To sell timber, the owner needs either to be registered as a self-employed person (sole proprietorship) or a joint-stock company.

Forest management

Norwegian forests are mainly managed as 'LNFR-areas' (abbreviation for 'Landbruks-, Natur- og Friluftformål samt Reindrift' = areas for the purpose of agriculture, nature and outdoor activities and reindeer herding) according to each municipality's masterplan for area classification. In most of the forest areas, no permits are needed before logging. In the Protective Forests bordering the mountains, in selected areas along the coast, in the Oslomarka forests bordering the Norwegian capital Oslo, and in northern Norway (Nordland, Troms and Finnmark), various notification forms or applications must be approved by local forest authorities prior to logging. Most of the logging, thinning and planting is conducted by professional entrepreneurs on contracts for timber buyers.

The use of Norwegian forest is regulated under the Forest Act. The Forestry Act was renewed in 2005. Forestry has relatively few regulations in Norway. Harvesting is regulated by the Ministry of Agriculture and Food.

The aim of the Act is to facilitate sustainable resource management, where harvesting does not exceed the regrowth rate, to secure biological diversity, landscape, recreation for people and cultural values in the forest and develop forests as storage and sinks of carbon. When felling timber, forest owners in Norway are required to promote the regrowth of new forest - either by planting, or by leaving seed trees to provide natural regeneration. Each municipality has authorities responsible for the management of forestry and forest-owners.

Laws and taxation of the Norwegian government particularly adapted to forest owners eases long term planning for forestry. For example, after harvest, owners are obliged to set aside a tax-exempt percentage of the profit. This forms the bases of a forest fund called 'skogfondsordningen' that can later be reinvested in the forest (education, tree planting, building roads, etc.) and often so with additional funding from government projects. Also it is legally mandatory after harvesting to plant trees or secure regrowth. Cooperation between government, forest owners and their partners has also facilitated the development of strict environmental rules for forestry.

Public access to forests is facilitated by forest owners and by a law called 'friluftsløven', securing use of land for recreational matters to everyone even if it is private property.

The Sámi people

The Sámi are an indigenous people resident in Sapmi (the land of Sámi) in Norway, Sweden, Finland and Russia. The Sámi people is acknowledged as equal to the rest of the Norwegian people, and there are several laws and regulations to secure the Sámi people's right to continue and develop their unique languages, cultures and traditions. The Indigenous and Tribal People's Convention (ILO-Convention no 169) was ratified by Norway in 1990.

Reindeer husbandry in Norway is conducted primarily in the Sámi reindeer herding area, which is divided into six regional reindeer herding areas; East-Finnmark, West-Finnmark, Troms, Nordland, Nord-Trøndelag and Sør-Trøndelag/Hedmark. The reindeer herding area covers 140 000 km², what is close to 50% of Norway.



Figure 2: The Norwegian Sámi reindeer herding area

When it comes to planning of different forms of land use, including forestry and reindeer husbandry the Norwegian Plan and Building Act from 2008 has an important role. §3-1 of the Act specifies several important tasks and considerations to be taken into account in planning. According to the law, consultation should be conducted when the planning of different forms of land uses falls into the LNF-category

(agriculture-, nature- and the open-air activities area), to which reindeer herding and forestry also belong. Both parties must find an agreement on operations which have a strong impact on reindeer herding. In general, the Reindeer Herding Act gives the Sámi the right to use the forests as herding areas, as well as to harvest firewood and smaller trees they need for buildings and facilities to be used in the reindeer husbandry.

Protected areas and species

In 2016, the Parliament decided on a target to strictly protect 10% of the Norwegian forests, partly through voluntary protection, partly through conserving public forests.

Table 3: Protected areas in the mainland of Norway - by area, amount, and proportion (2017)

Protection categories*	Protected area** (km ²)	Number of protected areas	Proportion of total area
National parks	31 294	39	9.7%
Nature reserves	6 782	2 265	2.1%
Landscape areas	17 231	194	5.3%
Other protected areas	387	458	0.1%

* Some protected areas belong to several protection categories

** Mainland of Norway including islands, but excluding Svalbard and Jan Mayen

Source: Statistics Norway

CITES species are present in Norway, but do not include any tree species.

Species classified as critically endangered include the Arctic fox, wolf and common guillemot. According to the Norwegian Environment Agency land-use change is a threat to 90% of all critically endangered, endangered and vulnerable species (threatened species). Commercial forestry is a threat to 41% of these vulnerable species.

Forests account for the largest proportion of red-listed species. Almost half (48%) of all threatened species are found in forests, either exclusively or both in forests and in other areas. The largest numbers of threatened species in forest habitats are in the species groups fungi (353 species), beetles (230 species), true flies or Diptera (128 species) and lichens (124 species). Many of the threatened species in forest are specialists, for example found on dead wood, large deciduous broad-leaved trees, burnt areas left by forest fires, or calcareous soils. A substantial proportion of the red-listed species found in forests are associated with rich broad-leaved forests, even though these represent only 1% of Norway's productive forest area.



Figure 3: Protected areas in Norway

4.3% of the total forest cover and 3% of the productive forest in Norway is situated in strictly protected areas such as national parks and nature reserves. During the ongoing process of protecting additional areas, care is taken to cover particularly high conservation values for species diversity, and especially threatened species.

The Norwegian Red list gives an overview of the rare, threatened and endangered species. Not all areas containing these species have an official protection status, however, as most forests are PEFC certified there should be measures taken to protect these vulnerable areas.

Key habitats

Norwegian forest properties are required to implement environmental surveys documenting key habitats. The key habitats are subjected by forestry legislation (§§ 4 and 5 in the regulation concerning sustainable forestry (FOR-2006-06-07-593)). After the survey, a landscape analysis of the combined results (assembly of possible key habitats) is made by a biologist. Each area is labelled on a scale A to C, where A-areas are most important. The ecological value of the key habitats shall be maintained during forestry activities, and according to §5 the management shall be in compliance to the guidelines given in the PEFC standard (requirement 21). The law itself does not give explicit guidelines, but it refers to this standard for practical execution. Almost all Norwegian forests are covered by one or more PEFC group-certificates. PEFC revision reports for the years 2014-2016 revealed very few breaches with regard to key habitats.

Sweden

Sweden's land area is 40.7 million hectare, of which 28.1 million hectares are forest land (69%). Of these 23.5 million hectares are productive forest land. Productive forest land is the most dominant land use followed by Alpine areas (5.1 million ha) and agricultural land.

Over half of the forests are PEFC-certified and slightly less have a double certification of FSC and PEFC.

Sweden's forests are dominated by Norway spruce and Scots pine. Almost the whole country is within the Boreal region. Up until the 1970's an increase in standing stock was realised by spruce, since then the volumes of spruce, pine and broadleaves have all increased.

Table 4: Annual increment of standing stock in Sweden per forest dominating tree species (2015)

Increment of standing stock (10 000 m³)							
Norway Spruce	Scots Pine	Birch spp.	Lodgepole pine	Oak spp.	Beech spp.	Other broadleaves	Total
5 959	4 198	1 531	311	102	62	628	12 791

Source: Statistics Sweden

The forest products industry is significant for the Swedish economy, and accounts for 9 to 12% of the Swedish industry's total employment. Around 73 000 people work in the forest and wood sector, of which 16 thousand in forestry, 28 thousand in wood working, and 29 thousand in the paper and paper products industry. Sweden is the third largest exporter of wood products in the world, after Canada and the US.

The total forest harvesting volume in Sweden is around 80 million m³ annually, which is below the annual increment of forests. Calculated as dry weight, the total volume is 2642 million tons.

Sweden ranks high on the Worldwide Governance Indicator (WGI) with excellent scores on 'rule of law' and 'control of corruption'. With a Corruption Perception Index (CPI) score of 85 points (in 2018), Sweden is one of the less corrupt countries in the world.

Forest ownership

The largest part of the Swedish productive forest land is in private ownership. About 50% of the productive forests are owned by people, 25% is owned by private companies, 17% by the state (including state-owned companies) and the remaining 8% is the property by other private or public organisations. All forestry activities in Sweden are subject to the same legislation and requirements.

The purpose of the Timber Measurement Act (1966: 209/SFS 2014:1005) is to give the seller and buyer of logs a tool to evaluate the price of the logs delivered to the industry. The law does not provide a basis for taxes and fees, but contributes to a credible and transparent market for logs.

The 'right of public access' gives people the possibility to gather mushrooms, berries and flowers that are not protected in the forests.

Forest management

The forest rotation period is usually 60-100 years, mostly with 2-3 intermediate thinnings. Planting and natural regeneration are both commonly used. GMO tree species are not used in forestry.

In recent years, continuous cover forestry methods are also applied. Continuous cover forestry is based on a 15-20 years harvesting cycle using selective harvesting techniques or the felling of small sites of less than 0.5 ha.

The Swedish Forestry Act aims at promoting high long-term wood production as well as environmental protection during forestry activities. It contains:

- an obligation to regenerate forest on forest land;
- a ban to harvest trees under certain ages;
- limitations to the size of clear cuts and young forest within an estate; and
- requirements to prevent outbreaks of pests.

However, the law does not contain requirements on silviculture measures, such as pre-commercial or commercial thinnings.

The authority to enforce requirements concerning environmental protection is delegated to the Swedish Forest Agency. Besides, the Forest Agency, the County Administrative Board, and the Municipality's environmental authorities are responsible for the supervision of several forestry related activities. The Forest Agency processes approximately 50 000-60 000 Timber Harvesting Notifications annually, which are inspected within a 6-week period allocated for this purpose. Harvesting permits are only required for specific

forest lands, e.g. mountainous forests. However, final fellings on areas larger than 0.5 ha must be notified in advance to the Swedish Forest Agency.

To define which forestry actions are legal is complicated. Most of the detailed requirements regulated by authorities such as the Swedish Forest Agency and the Swedish Work Environment Authority are used as references to issue injunctions to forest owners or buyers. The injunctions normally have a preventive character. Actions deviating from some regulations are not always regarded as illegal. Transgressing requirements of the Forest Agency could however be subject to injunctions on repairing measures, e.g. restoring disturbed waterways or clearing frequently used trails.

The Swedish interpretation of 'illegal harvested timber' in the EU Timber Regulation, as given in the Law on Trade with Timber and Wood products (2014:1009), includes only activities not complying with legal requirements subject to direct sanctions, such as fines or imprisonment.

Since 1993, the production and environmental function of forests are given equal importance in the opening paragraph of Sweden's Forestry Act. The Swedish Forestry Agency has also laid down regulations on detailed requirements in order to protect species and the environment. However, such requirements may not lead to any significant economic loss for the land owner.

The Swedish Forest Agency (SFA) uses satellite imagery; the imagery is essential to detecting illegal activities and to train forest owners in best management practices. This approach has proven to have a positive impact on forest productivity and on wild-life conservation.

The Sámi people

The Sámi live in the northern part of Sweden, covering a living space of 35 to 52% of Sweden (dependant on the source of information).

The Sámi people are the only ethnic group that has the status of indigenous people (Swedish Constitution). The Sámi culture is related to traditional reindeer husbandry.

The Sámi people's rights to use private and state-owned land when practising reindeer husbandry, hunting, and fishing are defined in the Reindeer Husbandry Act.

ILO Convention 169 is not ratified and there is evidence that the legislative framework for the area of the Sámi does not cover all the key provisions of ILO and UNDRIP.

Laws and regulations are in place to resolve conflicts, but participation of the Sámi in the decision-making sometimes fails. Conflict resolutions are not broadly accepted.

There have been a number of conflicts – of which some have been resolved in court - between the Sámi people and landowners regarding what actually are traditional Sámi territories.

According to the Swedish Forestry Act forestry activities such as harvesting must take the interests of reindeer husbandry into consideration. Many of the specific regulations on this matter are to be considered by the Swedish Forest Agency when dealing with Timber Harvesting Notifications (Swedish Forestry Act, section 13b, 14, 16, 18a, 18b, 31). When timber harvesting is carried out in continuous reindeer husbandry areas, consultation with the concerned Sámi community is required.

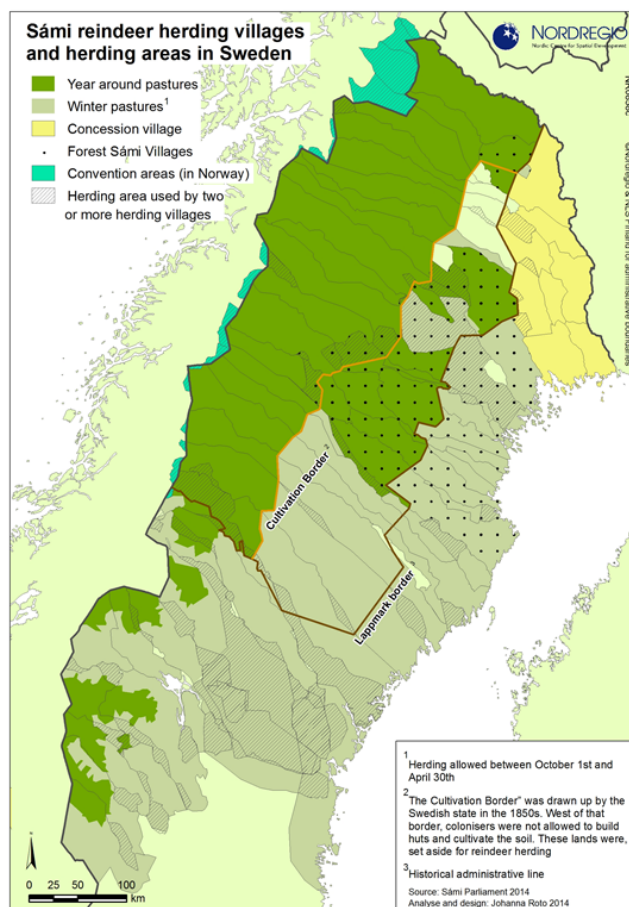


Figure 4: The Swedish Sámi reindeer herding area

Protected species and conservation areas

No CITES listed tree species are represented in the Swedish forestry.

A complete list of all plant and animal species that are protected throughout Sweden is available on the website of the Environmental Protection Agency. At present, there are about 300 species with the protected status throughout the country, and an additional fifty in one or more counties.

There is systematic planning of formal (legal) forest protection in Sweden through the establishment of national parks, nature reserves, habitat protection, Natura 2000-areas and nature conservation agreements.

Whereas national parks only may be established on state land, nature reserves, habitat protection, Natura 2000-areas or nature conservation agreements can be established on forest land that continues to be privately owned. A natural conservation agreement is a civil contract between the state and a forest owner through which the latter undertakes to limit its forestry activities or make specific conservation measures.

According to a regulation of the Swedish Forestry Agency (SKSFS 2011:7, Chapter 7, Section 17) harm to sensitive biotopes due to forestry activities must be avoided, or limited. The Agency has specified biotope types that it considers sensitive. Harming such biotopes during forestry activities is, however, not subject to legal sanctions, if no prior injunction was issued by the Agency.

According to statistics from the Swedish Forest Agency of 2013, around 4 300 (7,3%) of the notified final fellings were inspected before timber harvesting commenced. The inspections check if specified environmental requirements are addressed; they do not assess legality of forest activity in general. The inspections resulted in 129 injunctions to limit the harvesting area or to take specific measures.

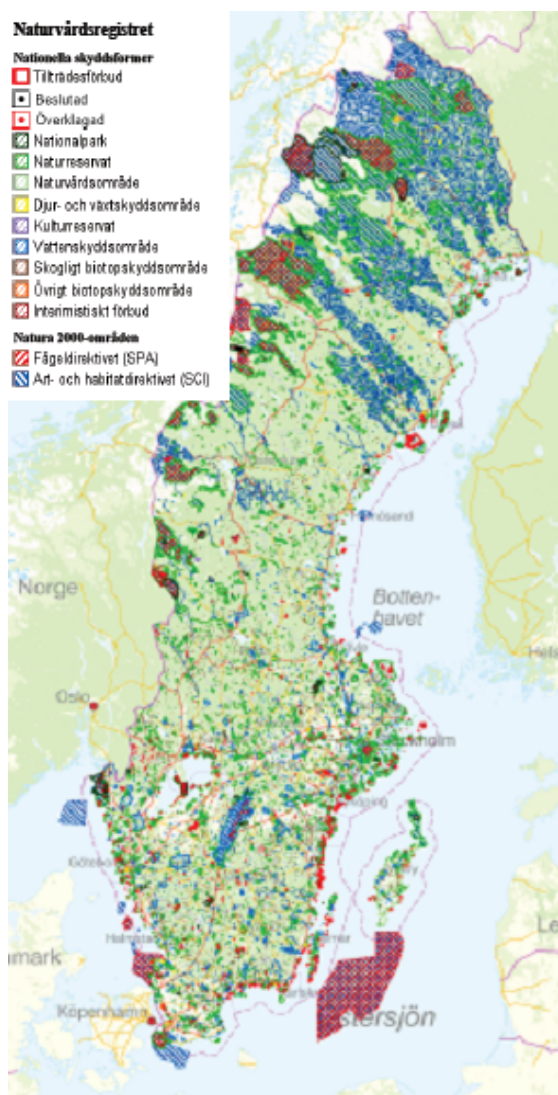


Figure 5: Protected areas in Sweden

2.2 Actions taken to promote certification amongst feedstock supplier

Grasmo is an FSC and PEFC certified company. It procures only from FSC and/or PEFC certified suppliers. In this way it stimulates market for certified wood supply. In Norway PEFC certification is popular and covers practically all commercially interesting forests. Grasmo, however, actively communicates it is also interested in FSC certification, and for this reason is looking for additional volumes in Sweden.

2.3 Final harvest sampling programme

No final fellings are used to source raw material for the pellet production, only wood residues are used. Considering the primary feedstock supply to the sawmills that is relevant for Grasmo, most is harvested by means of clear cuts. Only a small share of the stems of commercial thinnings are processed by the sawmills (Grasmo procures sawdust of timber processing). Continuous selective harvesting systems are used increasingly often in Norway and Sweden, but still the exception on the rule.

2.4 Flow diagram of feedstock inputs showing feedstock type [optional]

1	<i>Independent forest owners (private and public) in Norway and Sweden</i>
2	<i>Independent harvesting companies and harvestings teams of saw mills</i>
3	<i>Around five sawmills producing semi-finished products Sales of wood residues (sawdust) to Grasmo (with an FSC or PEFC certification claim)</i>
4	<i>Production of steam exploded (dark) wood pellets (by Grasmo)</i>
5	<i>Transport to the port of steam exploded wood pellets (commissioned by Grasmo)</i>

2.5 Quantification of the Supply Base

Supply Base

- a. Total Supply Base area (ha): 40.3 million ha (of forests and wood lands)
 - Norway: 12.2 million ha
 - Sweden: 28.1 million ha
- b. Tenure by type (ha): 32.3 million ha private, 8.0 million ha public property
 - Norway: 9.6 million ha private, 2.4 million ha public property
 - Sweden: 22.5 million ha private, 5.6 million ha public property
- c. Forest by type (ha): 40.3 million ha boreal forests
- d. Forest by management type (ha): 40.3 million ha managed natural forests
- e. Certified forest by scheme (ha):
 - FSC Norway: 641 003 ha (2019)
 - FSC Sweden: 13 370 511 ha (2019)
 - PEFC Norway: 7 380 750 ha (2017)
 - PEFC Sweden: 15 927 847 ha (2018)

Feedstock

- f. Total volume of Feedstock: 0 – 200,000 tonnes or m³*
- g. Volume of primary feedstock: 0 tons
- h. List percentage of primary feedstock (g), by the following categories.
 - Certified to an SBP-approved Forest Management Scheme
 - Not certified to an SBP-approved Forest Management Scheme

Not applicable.
- i. List all species in primary feedstock, including scientific name:
 - Scots pine (*Pinus sylvestris*)
 - Norway spruce (*Picea abies*)
- j. Volume of primary feedstock from primary forest: 0 tons
- k. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
 - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme
 - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme

Not applicable.
- l. Volume of secondary feedstock:
 - 0 – 200,000 tonnes or m³* of sawdust
 - (>95% is SBP-compliant secondary feedstock, the remainder is controlled material)
- m. Volume of tertiary feedstock: 0 tons

* A bandwidth is given as processing coefficients are confidential.

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
☐	☒

No Supply Base Evaluation was conducted, as the sufficient volumes of FSC and PEFC certified volumes are available.

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.

The Certifying Body has conducted Stakeholder Consultation.

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

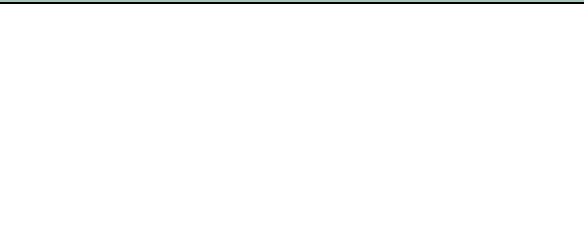
11.1 Peer review

Not applicable.

11.2 Public or additional reviews

The Supply Base Report was reviewed by Rens Hartkamp of BiomassConsult. His experience with SBP certification starts from the beginning of its development. He passed the SBP auditor exams in 2015 and, over the years, assisted over 40 companies on SBP certification. Rens Hartkamp holds an M.Sc. in forestry and a Ph.D. in forestry economics. He has around 20 years of experience in forest management and biomass certification, criteria development, and benchmarking projects.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	Anders Ettestøl 	SBP manager	28/05/2019
	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:	 ...	Director Grasmø	31/05/2019
	Name	Title	Date
Report approved by:	Bjørn Halvard Knappskog 	CEO Arbaflame	29/05/2019
	Name	Title	Date

13 Updates

13.1 Significant changes in the Supply Base

Not applicable (initial audit).

13.2 Effectiveness of previous mitigation measures

Not applicable (initial audit).

13.3 New risk ratings and mitigation measures

Not applicable (initial audit).

13.4 Actual figures for feedstock over the previous 12 months

Bandwidth 1: 0 – 200,000 tonnes or m³* of sawdust

> 95% is SBP-compliant secondary feedstock, the remainder is controlled material)

13.5 Projected figures for feedstock over the next 12 months

Bandwidth 1: 0 – 200,000 tonnes or m³* of sawdust

> 95% is SBP-compliant secondary feedstock, the remainder is controlled material)

* A bandwidth is given, as processing coefficients are confidential.